

FORM 1
(RULE 3-1 (1))

Court File #: XXXXXXXXXX

In the Supreme Court of British Columbia

Between

XXXXXXXXXXXXXXXXXXXXXXXXXXXX (Plaintiff)

and

Government of Canada, Government of British Columbia, City of Kamloops,
Prime Minister Justin Trudeau, Health Minister Patty Hajdu,
Chief Public Health Officer of Canada Theresa Tam, BC Premier John Horgan,
BC Provincial Health Officer Bonnie Henry, BC Health Minister Adrian Dix (Defendants)

NOTICE OF CIVIL CLAIM

[Rule 22-3 of the Supreme Court Civil Rules applies to all forms.]

This action has been started by the plaintiff(s) for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must

- (a) file a response to civil claim in Form 2 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim on the plaintiff.

If you intend to make a counterclaim, you or your lawyer must

- (a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and on any new parties named in the counterclaim.

JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the response to civil claim within the time for response to civil claim described below.

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiff(s),

- (a) if you were served with the notice of civil claim anywhere in Canada, within 21 days after that service,
- (b) if you were served with the notice of civil claim anywhere in the United States of America, within 35 days after that service,
- (c) if you were served with the notice of civil claim anywhere else, within 49 days after that service, or
- (d) if the time for response to civil claim has been set by order of the court, within that time.

CLAIM OF THE PLAINTIFF

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Outline of “planned-emic” situation

1. In very broad strokes, the public has been told that some virus called “Covid-19” originated in China and was causing a pandemic and a huge death toll.
2. Initially, the Canadian Government shrugged off the problem, and even suggested that people were racist¹ for associating it with Chinese people. The Feds refused to close the border² or implement any serious safety measures.
3. In a very calculated manner however, the Government of Canada changed its tune, as did Provincial Governments. Suddenly this was a serious epidemic and freedoms had to be curtailed.
4. All “non-essential” businesses were to be closed,³ travel between Provinces was banned,⁴ public gatherings⁵, gradually small groups were allowed,⁶ and religious services were to be suspended or drastically limited.⁷ Now, face coverings were to be made mandatory in many jurisdictions⁸. Intense limitations on freedoms were to be imposed

¹ <https://www.cbc.ca/news/politics/tam-public-health-coronavirus-racism-1.5445713>

² <https://www.thestar.com/politics/federal/2020/03/13/justin-trudeau-wont-close-the-border-at-least-for-now.html>

³ <http://www.bccdc.ca/health-info/diseases-conditions/covid-19/employers-businesses>

⁴ <https://www.ctvnews.ca/health/coronavirus/where-can-you-travel-within-canada-a-look-at-covid-19-restrictions-1.5001253>

⁵ <https://www.cbc.ca/news/canada/british-columbia/all-gatherings-off-the-table-no-new-bans-bc-1.5516991>

⁶ <https://www.cbc.ca/news/canada/british-columbia/covid-19-update-may-6-1.5556699>

⁷ <https://www2.gov.bc.ca/assets/gov/health/about-bc-s-health-care-system/office-of-the-provincial-health-officer/reports-publications/covid-19-pho-class-order-mass-gatherings.pdf>

⁸ <https://globalnews.ca/news/7041251/bc-ferries-mask-required/>

in an open-ended manner.⁹ People violating these arbitrary and draconian laws were subject to fines¹⁰. Hospitals were emptied out¹¹ in anticipation of death waves that never materialized. The situation varied somewhat across regions, but generally speaking, this is what happened.

5. The predictions of this virus are used to drive up fear and to control the population. Worse case, the virus was completely made up and doesn't exist. Best case, it has been completely overblown by various officials. In fact, there is evidence that Governments are deliberately inflating death counts in order to artificially increase the death toll.
6. Governments around the world, seem to enjoy their newfound power, which allows them to implement almost anything they wanted, without opposition. In Canada, the Quarantine Act was activated.¹²
7. It's become clear however, that there is no accountability of this so-called "pandemic". Municipalities rely on Provincial Health Ministers for instructions on how to act. Provinces rely on the Federal Government. The Feds rely on institutions like the World Health Organization for guidance. And the WHO claims to base recommendations on

⁹ <https://www.thestar.com/politics/provincial/2020/07/07/premier-doug-ford-to-extend-emergency-covid-19-powers-into-next-year.html>

¹⁰ <https://www.cbc.ca/news/canada/british-columbia/vancouver-social-distancing-penalties-state-of-emergency-1.5508543>

¹¹ <https://www.ctvnews.ca/health/coronavirus/all-of-our-rooms-are-empty-hospital-ers-vacant-during-pandemic-1.4918208>

¹² <https://www.canada.ca/en/public-health/news/2020/06/canada-extends-mandatory-requirements-under-the-quarantine-act-for-anyone-entering-canada.html>

Population control, vaccines, masks, shutting down services

13. The main takeaway here is that these measures imposed over the last 6 months have nothing to do with public safety. They are about population control, and erasing the freedoms and human rights that people enjoy.
14. One of the more visible signs is the masks, which are becoming more common. Even in areas where they are not mandated, efforts are made to “shift the culture?”,¹³ to make it more normal.¹⁴ Beyond that, should people be allowed to drive while wearing one? It would seem that the breathing problems that can occur, it would be a safety hazard.
15. It had long been touted that “masks will always be optional”, except they aren’t¹⁵ anymore in many areas,¹⁶¹⁷¹⁸ Now people like Doug Ford say we’ll be wearing masks for years to come.¹⁹ Quebec now has mandatory mask laws.²⁰ Masks are only “strongly

¹³ <https://ottawa.ctvnews.ca/culture-shift-needed-to-accept-wearing-masks-dr-etches-1.4947650>

¹⁴ <https://www.cbc.ca/news/canada/mask-wearing-attitudes-coronavirus-1.5569515>

¹⁵ <https://www.msn.com/en-ca/news/canada/doctors-call-for-alberta-to-make-wearing-a-mask-mandatory-in-public/ar-BB15yEpc>

¹⁶ <https://www.cbc.ca/news/health/mandatory-masks-1.5615728>

¹⁷ <https://nationalpost.com/news/canada/toronto-face-masks-mandatory-brampton-mississauga-peel-john-tory>

¹⁸ <https://www.freshdaily.ca/news/2020/06/mandatory-face-masks-canada/>

¹⁹ <https://www.msn.com/en-ca/money/topstories/ford-just-said-canadians-will-probably-be-wearing-face-masks-for-years-to-come/vp-BB16Jasw>

²⁰ <https://nationalpost.com/pmnl/news-pmn/canada-news-pmn/quebec-to-make-masks-mandatory-in-public-indoor-spaces-as-of-saturday-reports>

recommended” in BC, at least until they become mandatory.²¹ Similarly, we are told that “vaccines will always be optional”, but how long will that last for?

16. One particularly absurd case was in Brampton.²² On June 3rd, Mayor Patrick Brown announced that face masks would become mandatory – on July 2nd. Yes, CV-19 is such a pandemic that we need to enact this measure in another month.

17. True, this region of BC has been “relatively” free from government intrusion, compared to say – China²³ or Australia.²⁴ Those places experience Government enforced mass house arrest, and arbitrary detention. Nonetheless, the City, Provincial and Federal Governments have been trampling on people’s rights. This includes the Plaintiff specifically, and Canadians as a whole more broadly.

18. Federal Liberal Cabinet Minister Dominc LeBlanc has made the suggestion of passing laws to “combat misinformation around coronavirus”. In this context, misinformation is simply anything that contradicts the Government narrative. Though no law exists yet, the idea of trampling free speech like this is chilling.²⁵

²¹ <https://www.cbc.ca/news/canada/british-columbia/coronavirus-update-july-16-bc-1.5652640>

²² <https://www.680news.com/2020/06/03/patrick-brown-makes-face-masks-mandatory-on-public-transit-in-brampton/>

²³ <https://www.cbc.ca/player/play/1703503427818>

²⁴ <https://www.bbc.com/news/world-australia-53319554>

²⁵ <https://www.cbc.ca/news/politics/covid-misinformation-disinformation-law-1.5532325>

19. So-called “non essential” businesses were ordered to close, impacting the livelihoods of the people running them, and their employees.²⁶

20. So-called “social distancing” orders have resulted in fines being imposed across the country.²⁷

21. If nothing else, Governments participating in this coronavirus scam have succeeded in installing an absurd level of fear in their people. It’s a great way to control the population.

WHO supports research into DNA altering vaccines

22. The World Health Organization has lists available of different organizations who are working on various types of vaccines to covid-19.²⁸ Again, we are assuming that this virus actually exists. Many of the ones cited are ones with the potential to alter a person’s DNA.

Platform	Type	Developer
NonReplicating Viral Vector	Adenovirus Type 5 Vector	CanSino Biological Inc./Beijing Institute of Biotechnology
DNA	DNA plasmid vaccine Electroporation device	Inovio Pharmaceuticals

²⁶ <https://www2.gov.bc.ca/assets/gov/health/about-bc-s-health-care-system/office-of-the-provincial-health-officer/reports-publications/covid-19-pho-class-order-mass-gatherings.pdf>

²⁷ <https://www.cbc.ca/news/canada/british-columbia/vancouver-social-distancing-penalties-state-of-emergency-1.5508543>

²⁸ <https://www.who.int/news-room/detail/13-04-2020-public-statement-for-collaboration-on-covid-19-vaccine-development>

RNA	LNPencapsulated mRNA	Moderna/NIAID
DNA	DNA with electroporation	Karolinska Institute / Cobra Biologics (OPENCORONA Project)
DNA	DNA plasmid vaccine	Osaka University/ AnGes/ Takara Bio
DNA	DNA	Takis/Applied DNA Sciences/Evvivax
DNA	Plasmid DNA, Needle-Free Delivery	Immunomic Therapeutics, Inc./EpiVax, Inc./PharmaJet, Inc.
DNA	DNA plasmid vaccine	Zydus Cadila
RNA	LNPencapsulated mRNA cocktail encoding VLP	Fudan University/ Shanghai JiaoTong University/RNACure Biopharma
RNA	LNPencapsulated mRNA encoding RBD	Fudan University/ Shanghai JiaoTong University/RNACure Biopharma
RNA	Replicating Defective SARSCoV-2 derived RNAs	Centro Nacional Biotecnología (CNB- CSIC), Spain
RNA	LNPencapsulated mRNA	University of Tokyo/ Daiichi-Sankyo
RNA	Liposomeencapsulated mRNA	BIOCAD
RNA	mRNA	China CDC/Tongji University/Stermina
RNA	mRNA	Arcturus/Duke-NUS
RNA	mRNA	BioNTech/Fosun Pharma/Pfizer
RNA	saRNA	Imperial College London
RNA	mRNA	Curevac

23. A few obvious points need to be made. Imperial College London has a conflict of interest given their screwy computer modelling leading to the demand for these vaccines. Also, the NIAID is Anthony Fauci's organization, and Fauci was pushing for demand in the U.S.. And early trials are already resulting in serious side effects.²⁹
24. It also must be noted that the World Health Organization is heavily funded³⁰ by the Bill & Melinda Gates Foundation. This group has large financial interest in the vaccine industry, creating an obvious conflict of interest.
25. Side note: Anthony Fauci, the head of NIAID, the National Institute of Allergy and Infectious Diseases, is extremely influential with regards to U.S. policy. He was also on the Leadership Council³¹ of the Bill & Melinda Gates Foundation. However, that information had to be dug up.
26. It should also be pointed out that Bill Gates has repeatedly spoken about there being too many people on the planet, and the need to "depopulate".³² Yes, the man touting vaccines believes there are too many people alive. He sounds like a eugenicist.

Health risks associated with vaccines

²⁹ <https://justthenews.com/nation/science/moderna-covid-19-vaccine-induced-adverse-reactions-more-half-trial-participants#.XxBkMwrPZg8.twitter>

³⁰ <https://www.gatesfoundation.org/Media-Center/Press-Releases/2010/12/Global-Health-Leaders-Launch-Decade-of-Vaccines-Collaboration>

³¹ <https://www.gatesfoundation.org/Media-Center/Press-Releases/2010/12/Global-Health-Leaders-Launch-Decade-of-Vaccines-Collaboration>

³² <https://www.youtube.com/watch?v=ePgK3NOyc6I>

27. Bill Gates has been banned from India for causing some half a million people³³ to be paralyzed with his vaccines. It's also well known that he doesn't vaccinate his own children, which is very telling.³⁴

28. A number of studies have been done into the risks and complications of vaccines, yet our Governments seem hell bent on vaccinating everyone.

Health risks, no benefits, associated with face coverings

29. Municipal, Provincial, and Federal authorities harp on the need for masks and them being a benefit for public health. But they intentionally leave out the side effects – such as not being able to breathe properly.

30. It's an interesting approach that the parties are spreading. Instead of wearing a mask to protect your own health, they insist it is needed to protect "other" people's health. This technique is used to gaslight people into wearing them as an act of public safety.

31. However, despite all the hoopla that masks are needed to prevent infection spreading, there is little to no evidence that this actually is the case.³⁵³⁶³⁷³⁸³⁹

³³ <https://www.globalresearch.ca/bill-gates-faces-trial-in-india-for-illegally-testing-tribal-children-with-vaccines/5407864>

³⁴ <https://www.uspoliticsandnews.com/why-didnt-bill-gates-vaccinate-his-own-children/>

³⁵ <http://ocla.ca/wp-content/uploads/2020/04/Rancourt-Masks-dont-work-review-science-re-COVID19-policy.pdf>

³⁶ <https://pubmed.ncbi.nlm.nih.gov/19216002/>

³⁷ <https://www.cambridge.org/core/journals/epidemiology-and-infection/article/face-masks-to-prevent-transmission-of-influenza-virus-a-systematic-review/64D368496EBDE0AFCC6639CCC9D8BC05>

³⁸ <https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1750-2659.2011.00307.x>

³⁹ <https://www.cmaj.ca/content/188/8/567>

32. Again, despite the evidence that there is little benefit to masks, they continue to be mandated. These are political decisions and are about maintaining fear and control.

Neil Ferguson, Imperial College London: biased computer modelling

33. Many of the “global lockdown” measures were directly caused by the laughably wrong modelling that Neil Ferguson of Imperial College London produced. For a brief history of his track record of screwing up⁴⁰

34. In 2002, Ferguson predicted that, by 2008, up to 150,000 people could die from exposure to BSE (mad cow disease) in beef. In the UK, there were only 177 deaths from BSE.

35. In 2005, Ferguson predicted that up to 150 million people could be killed from bird flu. In the end, only 282 people died worldwide from the disease between 2003 and 2009.

36. In 2009, a government estimate, based on Ferguson’s advice, said a “reasonable worst-case scenario” was that the swine flu would lead to 65,000 British deaths. In the end, swine flu killed 457 people in the U.K.

37. Last March, Ferguson admitted that his Imperial College model of the COVID-19 disease was based on undocumented, 13-year-old computer code that was intended to be used for a feared influenza pandemic, rather than a coronavirus. Ferguson declined to release his original code so other scientists could check his results. He only released a heavily revised set of code last week, after a six-week delay.

⁴⁰ <https://www.dailymail.co.uk/news/article-8294439/ROSS-CLARK-Neil-Fergusons-lockdown-predictions-dodgy.html>

38. The above listings are grants/donations that the Bill & Melinda Gates Foundation⁴¹ has made to Imperial College London in the last 20 years. All citations came directly from the Gates website.

DATE	AMOUNT	PURPOSE
June 2002	\$31,928,231	Schistosomiasis Control
July 2002	\$30,000,000	HIV Prevention
Jan 2003	\$200,000,000	AIDS, Malaria, Other Diseases
July 2005	\$12,501,971	Tuberculosis
Oct 2005	\$8,636,543	Test CD4+, T-lymphnodes
Nov 2005	\$8,600,000	AIDS Testing
June 2006	\$9,185,813	Novel Recombinant Adenovirus
Oct 2006	\$9,826,566	Health Package in Dev. World
Dec 2006	\$46,700,000	Neglected Tropical Diseases
Sept 2007	\$3,565,073	Neglected Tropical Dis.
Oct 2007	\$47,616	STD, Infections
Oct 2008	\$100,000	Prevent TB Replication
Oct 2008	\$7,344,583	HIV/AIDS Research
Feb 2009	\$7,300,000	HIV/AIDS Research
Feb 2009	\$871,544	Collab W/Euro Partners

⁴¹ www.gatesfoundation.org

Sept 2009	\$16,529,688	Feeding Prog in Africa
Oct 2009	\$100,000	“Homing Factors” As Vax Adjuvants
Oct 2009	\$100,000	Enzymes, Malaria Parasites
Nov 2009	\$1,200,000	Nutrition Research
Sept 2010	\$2,692,835	Euro Agri Development
Oct 2010	\$3,044,244	HIV Computer Modelling***
Oct 2010	\$1,648,585	Neglected Tropical Disease
Nov 2010	2.7M (pounds)	Agricultural Research
Dec 2010	\$1,500,000	Disease From Livestock
Apr 2011	\$100,000	Polio Vaccine, India
Oct 2011	\$100,000	Self-Replicating Biosensor
Oct 2011	\$2,724,038	Malaria Blocker Research
May 2012	\$3,018,257	Oral Polio Vaccine
Oct 2012	\$3,589,972	Malaria Computer Models***
Oct 2012	\$1,132,773	HIV, Hormone Contraceptives
June 2013	\$5,194,767	HIV, Intervention, Planning
June 2013	\$1,397,325	Merger, Computer Modelling***
oct 2013	\$1,894,953	Advocacy, EU Donors
Oct 2013	\$648,060	Product Development, Misc.
Nov 2013	\$772,341	Polio Computer Modelling***
Nov 2013	\$2,054,944	DNA Vaccine, HIV

Nov 2013	\$582,541	TB Computer Modelling***
Nov 2013	\$2,743,052	Health Care Consulting
Sept 2014	\$74,433	Information Dissemination
Oct 2014	\$36,752	Vaxx Research Meetings
Oct 2014	\$98,934	Cell Phones, Meals
Oct 2014	\$181,868	Cost Estimates, Vaccines
Apr 2015	\$100,000	Meals Or Shoes For Vaxx
May 2015	\$249,549	Optical Imaging, Gut Lesions
July 2015	\$1,271,423	HIV/AIDS Testing
Nov 2015	\$180,000	Child Health, Africa
Dec 2015	\$15,558,425	Global Health Care
Apr 2016	\$100,000	Vaxx for HIV, mucosal
May 2016	\$37,468,960	Stop Malaria Transmission
Nov 2016	\$100,000	Malaria Tracing Modelling***
Nov 2016	\$5,625,310	Vaxx Computer Modelling***
Nov 2016	\$3,752,342	Mosquito Tampering
Nov 2017	\$736,222	Malaria Tracking
May 2018	\$1,320,030	HIV Prevention
Sept 2018	\$505,207	HIV/Reprod Modelling***
Sept 2018	\$292,318	Mosquito Sporozoites
Nov 2018	\$326,707	TB Computer Modelling***

May 2019	\$100,000	Crop Viruses
July 2019	\$11,300	Attend Mosquito Summit
Nov 2019	\$959,389	Typhoid Surveillance
Mar 2020	\$79,006,570	Malaria Control, Africa
May 2020	\$52,180	Testing Gene Drives
May 2020	\$2,699,443	Degradable Contraceptive Implant
June 2020	\$3,375,098	Population Replacement In Genes

39. Now, let's focus on a subset of that. These are just the donations the Gates Foundation has made to Imperial College London. This next group relates solely to computer modeling that Gates has financed.

40. Our various Governments seem not to be aware (or perhaps they ignore) that Imperial College London is creating the very computer models which the Gates Foundation uses to artificially drive up fear and demand for a vaccine, and other measures.

DATE	AMOUNT	PURPOSE
Oct 2010	\$3,044,244	HIV Computer Modelling***
Oct 2012	\$3,589,972	Malaria Computer Models***
June 2013	\$1,397,325	Merger, Computer Modelling***
Nov 2013	\$772,341	Polio Computer Modelling***

Nov 2013	\$582,541	TB Computer Modelling***
Nov 2016	\$100,000	Malaria Tracing Modelling***
Nov 2016	\$5,625,310	Vaxx Computer Modelling***
Sept 2018	\$505,207	HIV/Reprod Modelling***
Nov 2018	\$326,707	TB Computer Modelling***

41. While Imperial College London obviously has other donors as well, one has to wonder “why” the Gates Foundation would continue to fund Neil Ferguson’s work. This is especially true given his extensive track record of predicting things. Could it be a deliberate effort to drive up fear in order to inflate the demand for vaccines?

Bill & Melinda Gates Foundation Trust has major ties to big pharma

42. It is inconceivable that the Federal Government would even consider doing business with the Bill & Melinda Gates. The conflict of interest is always present. In addition to funding Imperial College London, the Trust owns stocks and bonds in many pharmaceutical companies⁴²

Company	Type Of Stock	Shares	Total Value
Eli Lilly	Corp Bonds	–	\$952,265
Gilead Sciences	Common	21,250	\$1,329,188
Gilead Sciences	Corp Bonds	–	\$3,297,777
Laobaixing Pharma	Common	831,829	\$5,719,831

⁴² https://apps.irs.gov/pub/epostcard/cor/911663695_201812_990PF_2019121216951560.pdf

Merck	Common	27,200	\$2,078,352
Novartis	Common	70,330	\$5,995,662
Pfizer	Common	39,500	\$1,724,175
Roche	Common	37,881	\$9,353,059
Sichuan Kelun	Common	2,818,448	8,480,098
Sinopharm	Common	394,080	\$1,655,978
Tasly Pharma	Common	8,114,941	\$22,693,515
Teva Fin BV	Corp Bonds	-	\$819,555
Teva Fin IV	Corp Bonds	-	\$9,465
Teva Pharma NE	Corp Bonds	-	\$1,106,435

43. Not only is the Gates Foundation Trust contain these (and more), there is also the issue of the Bill & Melinda Gates Foundation. Yes, the Foundation, and Foundation Trust are two separate entities.

44. Records available with the IRS in 2016⁴³, 2017⁴⁴, and 2018⁴⁵ show a consistent pattern of contributing to many pharmaceutical companies. Again, even the slightest bit of due diligence by Municipal, Provincial, or Federal authorities would have uncovered this.

45. And what about contributions from Gates to big pharma? Let's look at one

Year	Company	Amount
2011	GSK Biologicals	\$16,956,274
2012	GSK Biologicals	\$2,890,159
2013	GlaxoSmithKline	\$2,347,273

⁴³ https://apps.irs.gov/pub/epostcard/cor/562618866_201612_990PF_2018010215070540.pdf

⁴⁴ https://apps.irs.gov/pub/epostcard/cor/562618866_201712_990PF_2018121316001063.pdf

⁴⁵ https://apps.irs.gov/pub/epostcard/cor/562618866_201812_990PF_2020012317060344.pdf

2014	GSK Biologicals	\$1,199,441
2014	GSK Biologicals	\$6,000,000
2014	GSK Biologicals	\$14,060,000
2014	GSK Biologicals	\$1,281,469
2015	GSK Biologicals	\$1,281,432
2016	GlaxoSmithKline	\$1,511,994
2016	GSK Biologicals	\$15,100,417
2017	GlaxoSmithKline	\$322,663
2017	GlaxoSmithKline	\$1,801,901
2017	GlaxoSmithKline	\$320,265

46. Other donations can be found to companies like Merck, Novartis, Pfizer, Sanofi Pasteur, Teva. Coincidentally, these companies lobby our Governments for funding regularly. However, Canadian Officials have not yet seen fit to do any research or due diligence into any of this.

GAVI funded by Gates Foundation, lobbies using Crestview Strategy

47. GAVI is an organization that stands for the Global Alliance for Vaccines and Immunizations. It is heavily funded by the Bill & Melinda Gates Foundation. In fact, the Foundation donated \$750⁴⁶ million in 1999 to help start up GAVI, and donates regularly.

⁴⁶ <https://www.gavi.org/operating-model/gavis-partnership-model/bill-melinda-gates-foundation>

48. From March 2018 to January 2020, there were 20 communications reports⁴⁷ listed with the (Federal) Office of the Lobbying Commissioner between GAVI, and a lobbying firm called Crestview Strategy. Crestview is a firm with many political operatives peddling influence to other politicians.
49. Crestview Strategy was co-founded by Rob Silver⁴⁸, the husband of Katie Telford, Chief of Staff for Prime Minister Justin Trudeau. This almost certainly played a role in GAVI receiving \$800 million from the Canadian Government.⁴⁹
50. One of the Crestview operatives who lobbied on behalf of GAVI is a man named Zakery Blais⁵⁰. He worked for David Lametti back when Lametti was just a Parliamentary Secretary. However, Lametti is now the sitting Attorney General of Canada.
51. Another Crestview Strategy operative was a man named Jason Clark. Clark admits to volunteering for Liberal candidates in the 2015 Federal election⁵¹, at the same time he was helping GAVI promote other work.

⁴⁷

https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/advSrch?keywords=gavi&keywordsOp=PHRASE&documentType=both&adv_1001_level1common=&adv_2002_level1reg=&adv_3003_level1comlog=&srch=

⁴⁸ <https://www.cbc.ca/news/politics/rob-silver-leaves-crestview-citing-wife-s-job-as-trudeau-chief-of-staff-1.3389152>

⁴⁹ <https://needtoknow.news/2020/05/canada-gives-800-million-to-bill-gates-vaccine-program-following-lobbying-campaign/>

⁵⁰ <https://www.crestviewstrategy.ca/zakery-blais>

⁵¹ <https://www.crestviewstrategy.ca/jason-clark>

52. Beyond Silver, Blais, and Clark, Crestview Strategy is full of political hacks⁵², who use their political connections to push for favours for their clients. It must also be noted that many of them have ties to the Conservative Party of Canada as well. In any other profession, this would be called bribery, but it seems to be legal in Canada.

53. GAVI operatives lobby the Trudeau Government on the vaccine agenda, and Trudeau promotes the idea that there will be no return to normal without widespread vaccination. Seems that Trudeau is an obedient puppet.

54. Did none of the Municipal, Provincial or Federal authorities find the connections between Gates, GAVI, Crestview Strategy and the Trudeau Government strange? Did they even bother to do any research?

Gates Foundation funding CDC, World Health Organization

55. Two more conflicts of interest must be pointed out. The Bill & Melinda Gates Foundation is also a large contributor to WHO⁵³ (World Health Organization) and to the CDC⁵⁴ (Center for Disease Control). It shouldn't come as a surprise that both organizations support mass vaccination.

⁵² <https://www.crestviewstrategy.ca/our-team>

⁵³ <https://www.dr-rath-foundation.org/2019/01/world-health-organization-gates-foundation-now-second-largest-funder-after-u-s-government/>

⁵⁴ <https://www.cdcfoundation.org/blog-entry/cdc-foundation-receives-13.5-million-grant-from-gates-foundation>

56. Now that the United States has announced plans to stop funding WHO⁵⁵, that effectively leaves the Gates Foundation as the largest single donor. The conflict of interest cannot be overstated here.

57. To reiterate, the Canadian Government (and Government of BC, and others) have decided that they will simply defer to the World Health Organization on these matters. This is an abdication of their duties to govern.

58. Following the recommendations of authorities like this – instead of doing research and due diligence – is completely wrong.

World Health Organization and Theresa Tam

59. Theresa Tam, a foreign national from Hong Kong, is Canada's Chief Public Health Officer. Beyond being a foreigner, she also is on the Independent Oversight and Advisory Committee for the WHO Health Emergencies Programme⁵⁶. This is a very serious conflict of interest, and we have to wonder whose interest Tam really serves.

60. Beyond Tam, Geeta Rao Gupta⁵⁷ is another member of that same WHO Committee. Gupta previously was a senior fellow at the Bill & Melinda Gates Foundation. Yet another person with divided loyalties. And yet again, our Governments either are complicit, or grossly negligent, in following WHO advice.

⁵⁵ <https://www.foxnews.com/politics/trump-announces-funding-to-world-health-organization-who-halted>

⁵⁶ https://www.who.int/about/who_reform/emergency-capacities/oversight-committee/theresa-tam/en/

⁵⁷ https://www.who.int/about/who_reform/emergency-capacities/oversight-committee/geeta-rao-gupta/en/

Coronavirus “Planned-emic” was preplanned, premeditated

61. There is also evidence that this covid-19 “planned-emic” was premeditated for a very long time. Yes, this will sound like a crazy conspiracy theory, but consider the following:
62. From 2004 to 2006, the Canadian Government drafted a report on how to respond to a theoretical pandemic. It was noted that the more urgent it seemed, the more people could be convinced to go along (and this includes wearing masks)⁵⁸
63. In 2010, Theresa Tam appeared in a film called “Anatomy of an Outbreak”. She suggested that people could be locked up, have tracker bracelets put on their arms, and have their freedoms restricted. She also said it would be better to overreact and deal with the consequences later. Talk about predictive programming.⁵⁹
64. In 2010, Rockefeller released a paper on how a theoretical outbreak could be used to seize control of populations. It was also suggested that mandatory mask wearing could help it along. Rockefeller is on record as supporting a one world government.⁶⁰
65. In October 2019, there was “Event 201”, a fictional scenario where upwards of 30 million people could die from an intentionally staged outbreak. Again, a case of predictive programming.⁶¹

⁵⁸ https://www.longwoods.com/articles/images/Canada_Pandemic_Influenza.pdf

⁵⁹ <https://www.youtube.com/watch?v=VtSgG6-96x0>

⁶⁰ <https://needtoknow.news/2020/03/rockefeller-foundation-paper-published-in-2010-predicted-how-a-pandemic-can-be-used-as-an-excuse-to-establish-global-authoritarian-power/>

⁶¹ <https://prepareforchange.net/2020/01/27/event-201-bill-gates-world-economic-forum-simulated-coronavirus-outbreak-6-weeks-before-first-case-in-wuhan/>

66. Contrary to what the Defendants can (and likely will plead), there was no good faith effort. Instead, this was a planned, calculated effort to crack down on freedoms, and has been rehearsed. In the alternative, the parties were grossly negligent by not conducting any research into what was really going on. Good reporters and journalists have been covering this for months.

Gates owns patents for viruses

67. The creepiness doesn't end. It turns out that the Gates Foundation owns patents to viruses, including several strains of coronavirus.⁶² This work was performed by the Pirbright Institute, which Gates helps fund.⁶³

Year	Company	Amount
2016	Pirbright Inst.	\$44,598
2016	Pirbright Inst.	\$385,144
2016	Pirbright Inst.	\$525,826
2017	Pirbright Inst.	\$100,000
2018	Pirbright Inst.	\$311,878

⁶² <https://patents.justia.com/patent/10130701>

⁶³ <https://www.pirbright.ac.uk/news/2019/11/bill-melinda-gates-foundation-funds-development-pirbright's-livestock-antibody-hub>

68. Not only does Gates help fund the Pirbright Institute, this has been going on for quite a while. This information has been publicly available for months, yet Canadian Officials “choose” to not connect the dots.⁶⁴⁶⁵⁶⁶

Rampant lobbying by pharmaceutical industry

69. In order to understand why the Government is so hell bent on getting a vaccine out, it must be noted that there has been VERY heavy lobbying by the pharmaceutical industry. Just to name a few: AbCellera, Apotex, Biogen, GAVI, Gilead, GlaxoSmithKline, Merck, Perdue, Novartis, TEVA, VIDO-InterVac have been at it. This of course can be verified by consulting Federal and Provincial lobbying records.⁶⁷

The vaccine bonds industry

70. In May 2020, Canada announced that it would be making a \$125 million grant for so-called “vaccine bonds”.⁶⁸

71. How this works is that nations make legally binding pledges to IFFIm, the International Finance Facility for Immunization. IFFIm then sells bonds to the World Bank, who resells

⁶⁴ https://apps.irs.gov/pub/epostcard/cor/562618866_201612_990PF_2018010215070540.pdf

⁶⁵ https://apps.irs.gov/pub/epostcard/cor/562618866_201712_990PF_2018121316001063.pdf

⁶⁶ https://apps.irs.gov/pub/epostcard/cor/562618866_201812_990PF_2020012317060344.pdf

⁶⁷ Lobbycanada.gc.ca

⁶⁸ <https://www.rcinet.ca/en/2020/05/12/canada-commits-600m-for-global-vaccination-efforts/>

those bonds on the open market. Money gets sent to the World Bank, who transfers it to IFFIm, who gives it to GAVI, who uses it for vaccine research.⁶⁹

72. An obvious question is why not just give the money directly to GAVI, instead of having all these middlemen with their hands out.

73. Also, GAVI pays for IFFIm's administrative costs, so it can be argued that IFFIm essentially works for GAVI.⁷⁰

Digital ID, contact tracing and immunity passports

74. There is yet another project to note: ID2020.⁷¹ Its founders and main donors include: (a) the Bill & Melinda Gates Foundation; (b) Microsoft, which Bill Gates was CEO of; and (c) GAVI, which Gates heavily funds; and (d) the Rockefeller Foundation.⁷²

75. This idea has been floated in various forms: that people could be "chipped". This means having their medical records embedded in a microchip in their body for easy scanning. The idea is Orwellian beyond belief.⁷³

⁶⁹ <https://iffim.org/>

⁷⁰ <https://canucklaw.ca/wp-content/uploads/2020/05/IFFIm-2018-Trustees-Report-and-Financial-Statements.pdf>

⁷¹ <https://id2020.org/>

⁷² <https://id2020.org/alliance>

⁷³ <https://www.theguardian.com/world/2020/apr/25/who-warns-against-coronavirus-immunity-passports>

76. Theresa Tam has suggested that people wouldn't be able to travel or move around without proof of immunization, sometimes referred to as an "immunity passport".⁷⁴

77. Again, considering that the "pandemic" is grossly overhyped, and vaccines and chipping are being pushed, and it reeks of premeditation.

78. Various countries have implemented some form of "contact tracing" which means ways to track people's movements and who they associate with. Several cell phone apps have also been developed, including in Canada. Now, the public has been TOLD that these apps are voluntary⁷⁵. Then again, the public was told that masks are voluntary as well.

Evidence of lies regarding CV cases, masks

79. Here are some examples of instances in North America of the public being intentionally deceived by public health officials. This list is hardly all of them, but provides some insight as to what is happening on a bigger scale.

- i. Maria Van Kerkhove, head of the World Health Organization's emerging diseases and zoonosis unit, gave a speech on June 9, 2020, claiming that asymptomatic transmission was "very rare". After public backlash, she claimed the next day that

⁷⁴ <https://www.youtube.com/watch?v=VtSgG6-96x0>

⁷⁵ <https://www.cbc.ca/news/politics/contact-tracing-app-1.5617121>

- “very rare doesn’t mean very rare”. She also claimed WHO estimates global asymptomatic infection is 6%-41%. Quite the range.⁷⁶⁷⁷
- ii. Deborah Birx, White House Staff of Covid-19 outbreak admitted in a press conference that many governments are very lenient regarding what is counted as a “CV death”. However in subsequent press conferences she would double talk when confronted about that.⁷⁸
 - iii. The American CDC – Center for Disease Control – handed out new guidelines which encourage doctors to report CV-19 as cause of death, even if not sure.⁷⁹
 - iv. Anthony Fauci, (former member of Gates Foundation), first told the public that masks weren’t needed. He then “clarified” that he only said it to prevent the public doing a panic buy. He has been seen in public removing his mask as soon as he thinks the cameras are off.⁸⁰
 - v. The U.S. Surgeon General’s Office has flip flopped on the need of masks. Can’t seem to decide if they are helpful or nor.⁸¹⁸²

⁷⁶ <https://www.youtube.com/watch?v=NQTBlbx1Xjs>

⁷⁷ <https://www.youtube.com/watch?v=8rfqOi8Qh-Q>

⁷⁸ https://www.youtube.com/watch?v=IW3H_B36-7s

⁷⁹ <https://www.youtube.com/watch?v=w0X4Re5EDLE>

⁸⁰ <https://www.youtube.com/watch?v=NUHsEmllOe4>

⁸¹ https://twitter.com/Surgeon_General/status/1246210376351592448

⁸² https://twitter.com/Surgeon_General/status/1244020292365815809

- vi. The State of Colorado has been forced to “recalculate” its CV death toll, after it was made public that it had been conflating people who simply have this disease v.s. people who actually die from it.⁸³
- vii. Dr. Scott Jensen, a Minneapolis State Senator, claims that he had been “coached” in how to record deaths, even if the cause of death was uncertain.⁸⁴
- viii. The Mobile County, Alabama Health Department blamed a “clerical error” on a patient being wrong labelled a CV death⁸⁵
- ix. Washington State was found to be padding its CV-19 death toll by 13%, by conflating people who have this virus v.s. people who die from it⁸⁶
- x. Montana doctor Annie Bukacek as spoken publicly about how cause of death is being manipulated, and inflated.⁸⁷
- xi. The Pennsylvania Health Department has admitted to adding “suspected” CV-19 deaths to confirmed ones, hence inflating the total.⁸⁸
- xii. New York State has admitted that “probable” cases are added to confirmed cases, hence inflating the death toll.⁸⁹

⁸³ <https://www.youtube.com/watch?v=hpigBiL4QEU>

⁸⁴ <https://www.youtube.com/watch?v=lsRay1wlnBg>

⁸⁵ <https://www.youtube.com/watch?v=7fi7VlpSrkc>

⁸⁶ <https://www.freedomfoundation.com/washington/washington-state-over-reporting-covid-19-deaths/>

⁸⁷ https://www.youtube.com/watch?time_continue=194&v=_5wn1qs_bBk&feature=emb_logo

⁸⁸ <https://www.foxnews.com/us/pa-removes-200-deaths-official-coronavirus-count-questions-mount-reporting-process-data-accuracy>

⁸⁹ <https://www.nationalreview.com/corner/the-problem-with-new-york-citys-covid-19-death-rate-estimates/>

- xiii. The White House Press Core knows full well that covid-19 is a hoax. In various press conferences, they all wear masks for the conference, but remove them as soon as they think the cameras are off.⁹⁰
- xiv. Prime Minister Justin Trudeau repeatedly claims that this is a serious virus and shutting down the economy was necessary. It doesn't stop him from taking part in mass protests against "systemic racism" though.⁹¹
- xv. Despite telling people to stay home during Easter Weekend for "safety" reasons, it was apparently safe for Justin Trudeau to travel.⁹²
- xvi. Health Minister Patty Hajdu told Canadians to avoid unnecessary travel, but does it herself quite regularly.⁹³
- xvii. Theresa Tam claims that covid-19 is a pandemic, yet has publicly made comments that it's okay to go protest against systemic racism.
- xviii. The Ontario Government of Doug Ford has admitted to conflating deaths with people who simply "have" this virus compared to people who "die from" the virus.⁹⁴
- xix. Toronto Public Health has admitted to falsifying and conflating its death toll.⁹⁵

⁹⁰ <https://www.youtube.com/watch?v=6m-bZ1bowR8&list=PLjYwCy1a6lGh1W7dUoRrPizeKuP8Or36O>

⁹¹ https://www.youtube.com/watch?v=uVSjY_bGJy0

⁹² <https://globalnews.ca/news/6815936/coronavirus-justin-trudeau-andrew-scheer-easter-travel/>

⁹³ <https://thepostmillennial.com/trudeau-health-minister-broke-her-own-rules-to-fly-across-canada>

⁹⁴ <https://www.facebook.com/100016319417198/videos/675099263044048/>

⁹⁵ <https://twitter.com/TOPublicHealth/status/1275888390060285967>

80. These 19 examples are hardly exhaustive, but they do show a consistent pattern of public officials lying and deceiving. This death tolls (again, assuming the virus exists) are inflated to generate fear and panic.
81. More facts may be added to the Statement of Claim (if needed), but the above should demonstrate a nefarious pattern of behaviour.
82. By playing along with this obvious hoax, the Municipal, Provincial, and Federal Governments have abdicated their duties to govern in good faith. Whether through malicious acts (or sheer negligence and/or stupidity), the residents have been negatively impacted, and this includes the Plaintiff.
83. Even if these Governments were not INTENTIONALLY trying to trample on the rights of citizens, they are not off the hook. They were grossly negligent and incompetent, by failing to do the slightest due diligence into the agendas being pushed. All of the information in the above sections was freely available online. How much effort would it have taken to do some research?
84. Merely screaming “public health crisis” or a “pandemic” does not excuse, minimize, or justify their actions and betrayal of voters.
85. Whether through malicious intent, or just by being “useful idiots”, our Governments need to be held to account. This includes: Justin Trudeau, Patty Hajdu, Theresa Tam, John Horgan, Adrian Dix, and Bonnie Henry.

Part 2: RELIEF SOUGHT

86. The Plaintiff asks for the following remedies. Note: If they can't be done directly by the Municipal, Provincial or Federal Government, it's asked that the court direct the Government(s) to order to appropriate agencies to enact such policies.

- a) A permanent ban on mandatory face coverings Provincially and Nationally
- b) A ban on making masks mandatory for any job that does not actually require it (such as heavy industry and medical)
- c) A ban on face coverings for anyone driving and/or operating heavy equipment
- d) A ban on mandatory CV vaccines
- e) If these vaccines are completed at all, full public disclosure in advance of health risks, including DNA alteration
- f) A permanent ban on so-called "immunity passports" or any equivalent where travel or livelihood would be dependent on doing this
- g) A permanent ban on microchipping people, City/Province/Country
- h) An end to this "social distancing" nonsense, and shutting down or restricting businesses
- i) A permanent ban on any sort of mandatory contact tracing or other program where personal information is tracked by people in order to go about their day
- j) A permanent ban on the Wuhan or Australian style "lockdowns" which see entire communities under house arrest.

- k) A permanent ban on travel restrictions that prohibit residents of one Province from entering another Province.
- l) To void any tickets handed out to individuals/businesses in this case
- m) That the court strike down the Quarantine Act in its entirety
- n) Full court costs and expenses
- o) General damages and nominal damages

87. For any of the above that may not be implemented, it is requested that the Court PREEMPTIVELY ban/prohibit such acts from taking place. Also, it should be implied that all these remedies sought apply would apply both in the City, Province, Country.

Part 3: LEGAL BASIS

88. The following are a basis for which the Statement of Claim is brought:

- Canadian Charter, Section 1 (limitations of rights)
- Canadian Charter, Section 2 (fundamental freedoms)
- Canadian Charter, Section 6 (mobility rights)
- Canadian Charter, Section 7 (security of the person)
- Canadian Charter, Section 8 (freedom from unreasonable search/seizure)
- Canadian Charter, Section 9 (arbitrary detention)
- Canadian Charter, Section 12 (cruel & unusual punishment)
- Canadian Charter, Section 15 (discrimination)
- Canadian Charter, Section 24 (right to remedy grievances)
- Canadian Constitution, Section 91 (peace, order, good government)
- Quarantine Act
- BC Human Rights Code, Sections 2, 7, 8⁹⁶

⁹⁶ https://www.bclaws.ca/civix/document/id/complete/statreg/00_96210_01

- Canada Human Rights Act, Section 2, 3⁹⁷
- BC Supreme Court Rules

89. Please note: this list is not exhaustive, and may be added to at a later date.

Rights and freedoms in Canada

1. The *Canadian Charter of Rights and Freedoms* guarantees the rights and freedoms set out in it subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society.

90. It is the contention of the Plaintiff that none of the actions described here (such as mandatory masks, shutting down businesses, or prohibiting religious services or public gatherings), can be demonstrably justified in any way, shape or form.

91. As such, the court should not provide an excuse or exception to these Charter breaches.

There is no way to “save” the breaches.

Fundamental freedoms

2. Everyone has the following fundamental freedoms:

- (a) freedom of conscience and religion;
- (b) freedom of thought, belief, opinion and expression, including freedom of the press and other media of communication;
- (c) freedom of peaceful assembly; and
- (d) freedom of association.

⁹⁷ <https://laws-lois.justice.gc.ca/eng/acts/H-6/page-1.html>

92. Banning people from attending religious services, assembling peacefully, and associating freely with others violates the fundamental freedoms guaranteed under the Charter.

93. Worth a specific mention is the proposal of the Federal Government, and Minister Dominic LeBlanc to ban whatever he considers “misinformation”. Having different opinions, and/or questioning government narratives is a right of all Canadians.

Mobility of citizens

- 6. (1) Every citizen of Canada has the right to enter, remain in and leave Canada.
- Marginal note: Rights to move and gain livelihood
 - (2) Every citizen of Canada and every person who has the status of a permanent resident of Canada has the right
 - (a) to move to and take up residence in any province; and
 - (b) to pursue the gaining of a livelihood in any province.
- Marginal note: Limitation
 - (3) The rights specified in subsection (2) are subject to
 - (a) any laws or practices of general application in force in a province other than those that discriminate among persons primarily on the basis of province of present or previous residence; and
 - (b) any laws providing for reasonable residency requirements as a qualification for the receipt of publicly provided social services.

94. Freedom to move between Provinces, and within Provinces, is a right guaranteed to all citizens. However, various Premiers have banned or restricted such travel. Absent a JUSTIFIABLE reason for doing so, Government cannot tell its citizens where they have to live, or which areas they are forbidden to enter.

95. Merely alleging that there is a pandemic is not sufficient grounds.

7. Life, liberty and security of person

7. Everyone has the right to life, liberty and security of the person and the right not to be deprived thereof except in accordance with the principles of fundamental justice.

96. Proposals for mandatory vaccines, face masks, immunity passports are all invasive and violate the rights of Canadians. Again, these violations cannot be “saved” by Section 1, claiming that they are reasonably justified.

Search or seizure

8. Everyone has the right to be secure against unreasonable search or seizure.

Marginal note: Detention or imprisonment

9. Everyone has the right not to be arbitrarily detained or imprisoned.

Marginal note: Treatment or punishment

12. Everyone has the right not to be subjected to any cruel and unusual treatment or punishment

97. Writing people tickets (or even issuing warning), should be considered both an unreasonable search and seizure, and arbitrary detainment. Freedom to peacefully associate and assemble are fundamental freedoms, and there is no cause to infringe on those rights.

98. Simply “alleging” that there is a pandemic or public health crisis is grounds for these infringements, and this cannot be saved by Section 1.

99. Considering that people need human contact, and to be able to move and go about their lives, social distancing (a totally made up term) is in fact an infringement on a person’s right to be secure in their person.

Equality before and under law and equal protection and benefit of law

- **15. (1)** Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.

100. Section 15 guarantees equality for all under the law, without discrimination.

Various measures have included mandatory face coverings (which discriminate against those with disabilities, and shuttering religious services (which discriminate against the more religiously inclined).

101. One more time, the Government(s) cannot justify these infringements under Section 1 of the Charter. As such, they are completely illegal.

102. Section 24 of the Charter provides a remedy to address grievances. It is under that provision that this action is brought in the first place.

103. Section 91 of the Constitution refers to the POGG doctrine (peace, order and good government). By abdicating its responsibility to do so, and handing over authority to supra-national bodies, Canadians have been effectively abandoned. It should be noted that the various other agendas and conflicts of interest have contributed to there being no real government.

104. The BC Human Rights Code (sections 7 and 8), make it illegal to discriminate against people with a disability. If masks or vaccines are mandated – or made difficult to

refuse – the Government should view this as such. Note: section 2 explicitly states that there is no intent needed to be discriminatory.

105. The Canadian Human Rights Act makes it illegal to discriminate based on disability. Again, if Governments are going to mandate (or for all practical purposes mandate), masks or vaccines, this should be considered a disability.

106. The Quarantine Act is what the Federal Government used to attempt to justify stomping out people’s freedoms. This does not justify the actions described above, nor does it justify the abuse of Charter rights, both for the Plaintiff specifically, and Canadians more broadly. If rights can be taken away like this, then they aren’t really rights.

107. Per the Supreme Court rules, under Rule 3-7(1), evidence is not to be included in a pleading.

108. Per Rule 3-7(6) parties are not allowed to file inconsistent pleadings.

109. Per Rule 3-7(13) and Rule 3-7(14), it is not required to plead for general relief, and the amount of general damages is not to be claimed.

110. Based on the facts outlined in part 1, and the laws in part 3, the Plaintiff asks for the remedies listed in part 2.

(Date of Signature)

(Signature of Plaintiff)

Plaintiff's address for service:

E-mail address for service:

Place of trial Kamloops, BC:

The address of the registry is: 223-455 Columbia Street, Kamloops, BC V2C 6K4

Rule 7-1 (1) of the Supreme Court Civil Rules states:

(1) Unless all parties of record consent or the court otherwise orders, each party of record to an action must,

within 35 days after the end of the pleading period,

(a) prepare a list of documents in Form 22 that lists

(i) all documents that are or have been in the party's possession or control and that could, if available, be used by any party at trial to prove or disprove a material fact, and

(ii) all other documents to which the party intends to refer at trial, and

(b) serve the list on all parties of record.

Part 1: CONCISE SUMMARY OF NATURE OF CLAIM:

Part 2: THIS CLAIM ARISES FROM THE FOLLOWING:

[Check one box below for the case type that best describes this case.]

A personal injury arising out of:

a motor vehicle accident

medical malpractice

another cause

A dispute concerning:

contaminated sites

construction defects

real property (real estate)

personal property

the provision of goods or services or other general commercial matters

investment losses

the lending of money

an employment relationship

a will or other issues concerning the probate of an estate

a matter not listed here

Part 3: THIS CLAIM INVOLVES:

[Check all boxes below that apply to this case]

a class action

maritime law

aboriginal law

constitutional law

conflict of laws

none of the above

do not know