

Form 39.08

2021

Yar No. 510031

Supreme Court of Nova Scotia

BETWEEN:

Citizens Alliance of Nova Scotia and J.M. by his litigation guardian K.M

Applicant

and

Robert Strang acting as Chief Medical Officer of Health of Nova Scotia and Michelle Thompson acting as Minister of Health and Wellness of Nova Scotia and the Attorney General of Nova Scotia representing His Majesty the King in Right of the Province of Nova Scotia

Respondents

Affidavit of Shelly Hipson

I make oath and affirm and give evidence as follows:

1. I am Shelly Hipson.
2. I live in Atlantic, Shelburne County.
3. I am retired.
4. In my previous employment I managed the financial and day-to-day operations of Harbour Authorities in Shelburne County.
5. The source of all data and information in this Affidavit are from Freedom of Information requests and responses for official, publicly available Government data obtained through the Nova Scotia Provincial FOIPOP Office.
6. I have personal knowledge of the evidence sworn to in this Affidavit.
7. I started submitting FOI requests to the Government of Nova Scotia, primarily the Department of Health and Wellness and Nova Scotia Health to obtain government and hospital data and records related to COVID-19 mandates and responses between 2020 to present day.

8. The data received back from the government in Freedom of Information responses does not agree in material fact with what Dr. Robert Strang said publicly (Exhibits 1 - 17).
9. I obtained FOI responses that included reports from Dr. Lesley Whynot, Physician Lead, Adverse Events Following Immunization (AEFI) Management, Nova Scotia Health and Wellness, Assistant Professor, Dept. of Family Medicine, Dalhousie University that were sent to Dr. Robert Strang, Chief Medical Officer of Health and Dr. Shelley Deeks, Deputy Chief Medical Officer of Health.
 - a. These records list the sex of the individuals, the type of vaccine (Pfizer or Moderna) and the resulting AEFI.
 - b. Serious medical conditions that were listed in these AEFI records from Whynot to Strang included strokes, seizures, pulmonary embolisms, myocarditis, and death.

Sworn before me at Shelburne, Nova Scotia, this _____ day of November, 2024.

Notary Public

Shelly Hipson

TAB 1

2021	YAR 510031
<p data-bbox="370 537 1157 611">This is Exhibit 1 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="370 800 1157 804"/> <p data-bbox="574 848 995 884">Notary Public signature and seal</p>	

EXHIBIT 1

Freedom of Information Document Number: NSHA 2021-185

On November 22, 2021, I applied for the following FOIPOP information from the Nova Scotia Health Authority: Any record, proof, document, report that an asymptomatic positive COVID-19 case is contagious and spread to others in Nova Scotia.

Date range for record search: January 1, 2020 to November 22, 2021.

Exhibit 1 is a true copy of what I received back

December 7, 2021
Shelly Hipson
RR 3
Shelburne, NS B0T 1W0

Sent via e-mail to shellyhipson@xplornet.ca

Dear Shelly:

Re: No Responsive Records – OUR FILE# NSHA-2021-185

On November 22, 2021 Nova Scotia Health (NSH) received your request under the *Freedom of Information and Protection of Privacy Act (FOIPOP Act)*.

We understand your application to be for a copy of the following:

Any record, proof, document, report that an asymptomatic positive COVID-19 case is contagious and spread to others in Nova Scotia.

We have conducted a thorough search of our records, but we were not able to find any records responsive to your request. We are now closing your file.

Should you have any questions, please do not hesitate to contact me.

You have the right to seek a review with the Review Officer within 60 days of receiving this decision. Complete details of the process are outlined on the website of the Office of the Information & Privacy Commissioner: <https://foipop.ns.ca/request-a-review>. Notwithstanding, within 30 days you have the right to appeal directly to the Supreme Court if there is no third party notified pursuant to section 22 of the *FOIPOP Act*.

Sincerely,

Katie Smith
Freedom of Information Officer
Nova Scotia Health Authority
Halifax, Nova Scotia

TAB 2

2021	YAR 510031
<p>This is Exhibit 2 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr/> <p>Notary Public signature and seal</p>	

EXHIBIT 2

Freedom of Information Document Number: 2022-01142-HEA

On June 10, 2021 I applied for the following FOIPOP information from the Department of Health and Wellness:

I would like to learn the comorbidity data that the people had who died 'with' or 'from' COVID-19 including ages, sex, any information on studies/data that has been gathered on those who have died of COVID-19 in N.S. Date range for record Search: March 1, 2020 to June 17, 2021.

Exhibit 2 is a true copy of what I received back: 2022-01142-HEA.

Please note:

1. The definition of a COVID-19 deceased case on page 1 which states the following:

Deceased case

A probable or confirmed COVID-19 case whose death resulted from a clinically compatible illness, unless there is a clear alternative cause of death identified (e.g. trauma, poisoning, drug overdose)

A Medical Officer of Health, relevant public health authority, or a coroner may use their discretion when determining if a death was due to COVID-19, and their judgment will supersede the above-mentioned criteria.

A death due to COVID-19 may be attributed when COVID-19 is the cause of death or is a contributing factor.

2. In Table 1, 86.7% of the deaths are 65 years of age or older.
3. In Table 3, of the 90 COVID-19 deaths, it is noted that they had other very serious comorbidities at the time of death that include cardiac disorders, neurological conditions, and pulmonary disorders.
4. Deaths captured in this data set are those that meet the Public Health Agency of Canada case definition.

August 11, 2021

Shelly Hipson
RR3
Shelburne, NS
B0T1W0

Sent via email: shellyhipson@xplornet.ca

Dear Shelly Hipson:

Re: You are entitled to the information you requested - 2021-01142-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (or the Act) on June 10, 2021.

In your application, you requested a copy of the following records:

I would like to learn the comorbidity data that the people had who died 'with' or 'from' COVID-19 including ages, sex, etc. Any information or studies/data that has been gathered on those who have died of COVID-19 in NS.

Responsive records have been located and are attached.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Chris Mack at 902-424-0262 or by e-mail at chris.mack@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Jeannine Lagassé
Associate Deputy Minister

Attach.

TAB 3

2021	YAR 510031
<p data-bbox="370 537 1133 613">This is Exhibit 3 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="370 800 1154 804"/> <p data-bbox="574 848 993 884">Notary Public signature and seal</p>	

EXHIBIT 3

Freedom of Information Document Number: 2021-01575-HEA

On August 19, 2021 I applied for the following FOIPOP information from the Department of Health and Wellness:

Amended September 8, 2021: Records that show,

1. Definition of a COVID-19 case that is used in Nova Scotia.
2. Please provide any and all reports from the start of the pandemic on how COVID-19 deaths were determined.
3. Report on COVID-19 deaths that were probable or from clinically compatible illness
4. Information/data that has been gathered as a result of COVID-19 testing:
 - a. Total number of COVID-19 tests done monthly for 2020 and so far in 2021

Please provide: Number that were positive: For the positive cases, please include how many were: Confirmed, Probable, Symptomatic, Asymptomatic Number that were negative:

Total number of COVID-19 deaths: Determined by PCR test, Determined by a public health authority, a coroner using their discretion, autopsy

How many of the deaths were tested and symptomatic, asymptomatic, confirmed. Any record that identifies data that shows that the only illness they had was COVID-19 and it was the true cause of death (they did not die because they were at the end of life and they did not have any other serious illness – for example, they were young, healthy, and died of COVID-19 only)

Date range for record search: From March 22, 2020 to August 19, 2021.

Exhibit 3 is a true copy of what I received back: FOIPOP 2021-01575-HEA.

Please note:

1. The definition of a COVID-19 Deceased Case in the Data notes on page 1.
2. The total number of COVID-19 tests for 2020: 236,201
3. The total number of COVID-19 tests for 2020 that were negative: 234,437
4. The total number of COVID-19 tests for 2020 that were positive: 1,635
5. The total number of COVID-19 deaths for 2020 were: 66
6. The total number of COVID-19 tests for 2021: 847,234
7. The total number of COVID-19 tests for 2021 that were negative: 842,214
8. The total number of COVID-19 tests for 2021 that were positive: 4,791

9. The total number of COVID-19 deaths for 2021 were: 49
10. The total number of COVID-19 tests completed for 2020 and 2021 were:
1,083,435.
11. The total number of COVID-19 tests that were negative for 2020 and 2021 were:
1,076,651.
12. The total number of COVID-19 tests that were positive for 2020 and 2021 were:
6,426.
13. The total number of COVID-19 deaths for 2020 and 2021 was: 114.
14. 114 people died out of 6,426 positive tests in two years.

December 15, 2021

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Sent via email: shellyhipson@gmail.com

Dear Shelly D Hipson:

Re: You are entitled to the information you requested - 2021-01575-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on August 19, 2021.

In your application, you requested a copy of the following records:

Amended September 8, 2021: Records that show,

- 1. Definition of a COVID-19 case that is used in Nova Scotia.*
- 2. Please provide any and all reports from the start of the pandemic on how COVID-19 death were determined.*
- 3. Report on COVID-19 deaths that were probable or from clinically compatible illness*
- 4. Information/data that has been gathered as a result of COVID-19 testing:*
 - a. Total number of COVID-19 tests done monthly for 2020 and so far in 2021, Please provide: Number that were positive:*
For the positive cases, please include how many were:
Confirmed, Probable, Symptomatic, Asymptomatic
Number that were negative: Total number of COVID-19 deaths:
Determined by PCR test, Determined by a public health authority, a coroner using their discretion, autopsy
How many of the deaths were tested and symptomatic, asymptomatic, confirmed.
Any record that identifies data that shows that the only illness they had was COVID-19 and it was the true cause of death (they did not die because they were at the end of life and they did not have any other serious illness – for example, they were young, healthy, and died of COVID-19 only)
(Date Range for Record Search: From 3/22/2020 To 8/19/2021)

Responsive records have been located and are attached. Records have been provided that respond to part 1 and 4 of your request. The Department has completed a search for records that respond to part 2 and 3 of your request and no responsive records were found.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Craig Beaton
Associate Deputy Minister

Attachment

TAB 4

2021	YAR 510031
<p data-bbox="370 537 1133 613">This is Exhibit 4 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 848 993 884">Notary Public signature and seal</p>	

EXHIBIT 4

Freedom of Information Document Number 2022-00112-HEA:

On January 21, 2022 I applied for the following FOIPOP information from the Department of Health and Wellness:

1. Total number of teachers who have tested Positive for COVID-19 broken down into symptomatic, asymptomatic, and how they determined they were positive: Rapid Test/PCR Test/Combination of Rapid & PCR
2. Total number of students who have tested Positive for COVID-19 Broken down into symptomatic, asymptomatic, and how they determined they were positive: Rapid Test/PCR Test/Combination of Rapid & PCR
3. Total number of school staff who have tested Positive for COVID-19 broken down into symptomatic, asymptomatic, and how they determined they were positive: Rapid Test/PCR Test/Combination of Rapid & PCR
4. Please provide the recovery rate as well as a) The total number of COVID-19 infections/cases that resulted in hospitalizations (general and ICU) that have been traced to someone attending a school
5. COVID-19 deaths that have been traced back to transmissions at or from a school.

Range for records broken down into school years.

Spring 2020 - start of the pandemic.

September 2020 - End of school year in June of 2021.

September 2021 - to January 21, 2022.

Exhibit 4 is a true copy of what I received back: FOIPOP 2022-00112-HEA.

Please Note:

1. There is no record.

February 22, 2022

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Sent via email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: We do not have the information you asked for – 2022-00112-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on January 21, 2022.

In your application, you requested a copy of the following records:

1. *Total number of teachers who have tested Positive for COVID-19 broken down into symptomatic, asymptomatic, and how they determined they were positive: Rapid Test/PCR Test/Combination of Rapid & PCR*
2. *Total number of students who have tested Positive for COVID-19 Broken down into symptomatic, asymptomatic, and how they determined they were positive: Rapid Test/PCR Test/Combination of Rapid & PCR*
3. *Total number of school staff who have tested Positive for COVID-19 broken down into symptomatic, asymptomatic, and how they determined they were positive: Rapid Test/PCR Test/Combination of Rapid & PCR*
4. *Please provide the recovery rate as well as*
 - a) *The total number of COVID-19 infections/cases that resulted in hospitalizations (general and ICU) that have been traced to someone attending a school*
5. *COVID-19 deaths that have been traced back to transmissions at or from a school.*

Range for records broken down into school years.

Spring 2020 - start of the pandemic

September 2020 - End of school year in June of 2021

September 2021 - to January 21, 2022

(Date Range for Record Search: From 01/31/2020 To 01/20/2022)

After a file search, we have located no records responsive to your application. Therefore, it is my understanding, pursuant to clause 7(2)(b) of the Act, that the Department of Health and Wellness does not have custody or control of records which would respond to your application. A description as to whether a case is a student, teacher or staff is not recorded in Panorama.

The Nova Scotia Health Authority may hold records that respond to the scope of this request.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca.

Sincerely,



Craig Beaton
Associate Deputy Minister

TAB 5

2021	YAR 510031
<p data-bbox="370 541 1133 615">This is Exhibit 5 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 993 884">Notary Public signature and seal</p>	

EXHIBIT 5

Freedom of Information Document Number 2022-00445-HEA:

On March 14, 2022 I applied for the following FOIPOP information from the Department of Health and Wellness:

1. Number of COVID-19 tests by month and result (positive cases/negative/total) for year 2020, year 2021 and so far for 2022)
2. Number of COVID-19 Cases by month that were Asymptomatic and Symptomatic and total for each year 2020 and year 2021
3. Number of COVID-19 deaths per month in Nova Scotia for year 2020 and year 2021 and so far in 2022.

Date range for record search: December 31, 2019 to March 11, 2022.

Exhibit 5 is a true copy of what I received back: FOIPOP 2022-00445-HEA.

April 13, 2022

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Sent via email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: You are entitled to the information you requested - 2022-00445-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on March 14, 2022.

In your application, you requested a copy of the following records:

- 1. Number of COVID-19 tests by month and result (positive cases/negative/total) for year 2020, year 2021 and so far for 2022)*
- 2. Number of COVID-19 Cases by month that were Asymptomatic and Symptomatic and total for each year 2020 and year 2021*
- 3. Number of COVID-19 deaths per month in Nova Scotia for year 2020 and year 2021 and so far in 2022.*

(Date Range for Record Search: From 12/31/2019 To 3/11/2022)

Responsive records have been located and are attached.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Craig Beaton
Associate Deputy Minister

Attachment

TAB 6

2021	YAR 510031
<p data-bbox="370 541 1133 615">This is Exhibit 6 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 850 993 884">Notary Public signature and seal</p>	

EXHIBIT 6

Freedom of Information Document Number NSHA 2021-109 Updated:

On August 23, 2021 I applied for the following FOIPOP information from the Nova Scotia Health Authority:

How many ICU hospitalizations were there each month for COVID-19 in 2020 and for each month in 2021 up to and including September?

Date range for record Search: December 31, 2019 to September 30, 2021.

Exhibit 6 is a true copy of what I received back:

In conclusion, the ICU hospital beds were not full of COVID-19 patients in 2020.



September 16, 2021
Shelly Hipson
RR3
Shelburne, NS B0T 1W0

Sent via e-mail to shellyhipson@gmail.com

Dear Shelly:

Re: Partial Access Further Explanation – OUR FILE# NSHA-2021-109

On August 23, 2021 Nova Scotia Health (NSH) received your request, transferred by the Department of Health and Wellness under the *Freedom of Information and Protection of Privacy Act (FOIPOP Act)*.

We understand your application to be for a copy of the following:
How many ICU hospitalizations were there each month for COVID-19 in 2020 and for each month in 2021 up to and including July? (Date Range for Record Search: From 12/31/2019 To 07/31/2021).

I have withheld personal health information under section 20(3)(a) of the *FOIPOP Act*. Section 20(3)(a) of the *FOIPOP Act* says that *disclosing another individual's medical or other health care history, diagnosis, treatment, and evaluation is presumed to be an unreasonable invasion of that individual's privacy* so this information cannot be disclosed.

I am protecting the individual's privacy by changing all numbers less than 5 to "<5" in the attached spreadsheet. Nova Scotia's privacy laws protect both identified individuals and identifiable individuals. On the one hand, if the spreadsheet said "Katie Smith" in the data column for Dartmouth General ICU in the month of December 2021 then I am an identified individual. On the other hand, if the spreadsheet said 1 in the data column for Dartmouth General ICU in the month of December 2021, Nova Scotia Health posted an exposure notice saying there is a COVID exposure on a bus route from the specific bus stop near my house to the specific bus stop near my work on December 1, 2021, and Nova Scotia Health posted another exposure notice saying that there is a COVID exposure at my work on December 1, 2021; then, someone could piece together who I am from the combination of the data in the spreadsheet and the COVID exposure notices. All the pieces put together could potentially make me an identifiable person.

Moreover, for context, I checked with the individual who created the data sheet and they said the "Cape Breton Health Care Complex" refers to the ICU at Cape Breton Regional Hospital. It is the only hospital with an ICU in the area.

Should you have any questions, please do not hesitate to contact me.



You have the right to seek a review with the Review Officer within 60 days from receiving your original decision letter. You received your original decision letter on **September 13, 2021**. Complete details of the process are outlined on the website of the Office of the Information & Privacy Commissioner: <https://foipop.ns.ca/request-a-review>.

Sincerely,
Katie Smith
Freedom of Information Officer
Nova Scotia Health Authority
Halifax, Nova Scotia

TAB 7

2021	YAR 510031
<p data-bbox="370 541 1133 615">This is Exhibit 7 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 992 884">Notary Public signature and seal</p>	

EXHIBIT 7

Freedom of Information Document Number NSHA 2021-173:

On November 17, 2021 I applied for the following FOIPOP information from the Nova Scotia Health Authority:

% of COVID hospitalizations of all hospitalizations;

% COVID ICU hospitalizations of ICU hospitalizations;

COVID ICU hospitalizations.

Date range for record Search: Year 2020 up to October 31, 2021.

Exhibit 7 is a true copy of what I received back: NSHA 2021-173.

Based on this record I concluded that the majority of hospital admissions and IUC admissions were not COVID-19 related as reflected in the zeros and the redacted less than five in this FOI response.



December 17, 2021
Shelly Hipson
RR 3
Shelburne, NS B0T 1W0

Sent via e-mail to shellyhipson@xplornet.ca

Dear Shelly:

Re: Partial Access– OUR FILE# NSHA-2021-173

On November 17, 2021 Nova Scotia Health (NSH) received your request under the *Freedom of Information and Protection of Privacy Act (FOIPOP Act)*.

We understand your application to be for a copy of the following:

- % of COVID hospitalizations of all hospitalizations*
- % COVID ICU hospitalizations of ICU hospitalizations*
- # COVID ICU hospitalizations*

Please find a copy of the records located in response to your request. We have withheld personal health information under section 20(3)(a) of the *FOIPOP Act*.

We cannot disclose the percentage of COVID ICU hospitalizations of ICU hospitalizations when fewer than five patients were in the ICU because it is about identifiable individuals. The combination of this information with the information we will release to you in FOIPOP 2021-181, the total ICU hospitalizations, would allow these individuals to be identified.

We cannot disclose the percentage of COVID hospitalizations when fewer than five patients were in the hospital because it is about identifiable individuals. The combination of this information with the information we will release to you in FOIPOP 2021-181, the total hospitalizations, would allow these individuals to be identified.

Should you have any questions, please do not hesitate to contact me.

You have the right to seek a review with the Review Officer within 60 days of receiving this decision. Complete details of the process are outlined on the website of the Office of the Information & Privacy Commissioner: <https://foipop.ns.ca/request-a-review>.

Sincerely,

Katie Smith
Freedom of Information Officer
Nova Scotia Health Authority
Halifax, Nova Scotia

TAB 8

2021	YAR 510031
<p data-bbox="370 541 1133 615">This is Exhibit 8 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 993 884">Notary Public signature and seal</p>	

EXHIBIT 8

Freedom of Information Document Number NSHA 2021-181:

On November 22, 2021 I applied for the following FOIPOP information from Nova Scotia Health:

1. All reports/data on reasons why people were admitted into hospital for 2019, 2020, and 2021 by month, by hospital.

a.) general hospitalizations/admissions and

b.) ICU admissions (If there is a document that already has this information and additional information I would like a copy of this please.

2. A breakdown on the number of visits to hospital/reasons associated with receiving the COVID-19 vaccine.

a.) emergency visits b.) hospitalizations and c.) ICU admissions d.) 911 ambulance/First Responder calls from December 14, 2020 to present.

Date range for record Search: For 2019, 2020, & 2021.

Exhibit 8 is a true copy of what I received back: NSHA 2021-181.

Please note:

1. This FOI response provides context to the number of overall Total Admissions and ICU Admissions in 2018, 2019, 2020.
2. It also shows all the reasons why people are admitted into hospital.

January 28, 2022
Shelly Hipson
RR 3
Shelburne, NS B0T 1W0

Sent via e-mail to shellyhipson@xplornet.ca

Dear Shelly:

Re: Partial Access – OUR FILE# NSHA-2021-181

On November 22, 2021 Nova Scotia Health (NSH) received your request under the *Freedom of Information and Protection of Privacy Act (FOIPOP Act)*.

We understand your application to be for a copy of the following:

1. *All reports/data on reasons why people were admitted into hospital for 2019, 2020, and 2021 by month, by hospital.*
 - a.) *general hospitalizations/admissions and*
 - b.) *ICU admissions (If there is a document that already has this information and additional information I would like a copy of this please.*
2. *A breakdown on the number of visits to hospital/reasons associated with receiving the COVID-19 vaccine.*
 - a.) *emergency visits*
 - b.) *hospitalizations and*
 - c.) *ICU admissions*
 - d.) *911 ambulance/First Responder calls from December 14, 2020 to present.*

Please find a copy of the records located in response to your request.

We have withheld personal information about health under section 20(3)(a) of the *FOIPOP Act* by redacting all numbers that are fewer than five for the reasons for hospitalization, visits, and admissions for items one and two.

Section 20(3)(a) of the *FOIPOP Act* states: *A disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy if the personal information relates to a medical, dental, psychiatric, psychological or other health-care history, diagnosis, condition, treatment or evaluation.*

We have provided combined totals by month for some rural facilities in Northern Zone, Eastern Zone, and Central Zone for item one to protect individual's privacy under section 20(3)(a) of the *FOIPOP Act*. The remaining facilities have individual totals by month.

Please note that the data for item two is only the general information for emergency visits, hospitalizations, and admissions. DHW will provide the specific vaccine-related data.



Section 4(2)(d) of the FOIPOP Act states that *public bodies can't provide access to a record when it falls under section 7 of the Emergency 911 Act*. 911 ambulance and first responder calls fall within that section so I cannot provide you with that data for item 2(d).

Should you have any questions, please do not hesitate to contact me.

You have the right to seek a review with the Review Officer within 60 days of receiving this decision. Complete details of the process are outlined on the website of the Office of the Information & Privacy Commissioner: <https://foipop.ns.ca/request-a-review>.

Sincerely,

Katie Smith
Freedom of Information Officer
Nova Scotia Health Authority
Halifax, Nova Scotia

TAB 9

2021	YAR 510031
<p data-bbox="357 537 1136 613">This is Exhibit 9 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="357 798 1153 802"/> <p data-bbox="568 848 998 886">Notary Public signature and seal</p>	

EXHIBIT 9

Freedom of Information Document Number 2022-00110-HEA:

On January 21, 2022, I applied for the following FOIPOP information from the Department of Health and Wellness:

<https://novascotia.ca/news/release/?id=20211029007>

In this op-ed (link above) on October 29, 2021, by Dr. Robert Strang, Nova Scotia's Chief Medical Officer of Health, and Dr. Shelley Deeks, Deputy Chief Medical Officer of Health

They state:

Receiving the COVID-19 vaccine is one of the single most important steps you can take to protect yourself and others from this virus.

The science is clear: the benefits far outweigh any risk associated with COVID-19 vaccines.

1.) I would like to request all records, the evidence, the proof that what Dr. Robert Strang and Dr. Shelley Deeks is saying is true:

"That the COVID-19 vaccine is one of the single most important steps you can take to protect yourself and others from this virus." (What proof do they have that the vaccine is protecting people and others?)

2. I would like to receive a copy of "the science" that they reference in this statement as being clear - that shows that "the benefits (of the vaccines) far outweigh any risk associated with COVID-19 vaccines.

Please provide the risk-benefit analysis that they are referring too.

Date range for record search: September 30, 2021 to October 31, 2021.

Exhibit 9 is a true copy of what I received back: 2022-00110-HEA

February 22, 2022

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Sent via Email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: We cannot grant your request – 2022-00110-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on January 21, 2022.

In your application, you requested a copy of the following records:

<https://novascotia.ca/news/release/?id=20211029007>

In this op-ed (link above) on October 29, 2021, by Dr. Robert Strang, Nova Scotia's Chief Medical Officer of Health, and Dr. Shelley Deeks, Deputy Chief Medical Officer of Health

They state:

Receiving the COVID-19 vaccine is one of the single most important steps you can take to protect yourself and others from this virus. The science is clear: the benefits far outweigh any risk associated with COVID-19 vaccines.

1.) I would like to request all records, the evidence, the proof that what Dr. Robert Strang and Dr. Shelley Deeks is saying is true: "That the COVID-19 vaccine is one of the single most important steps you can take to protect yourself and others from this virus." (What proof do they have that the vaccine is protecting people and others?)

2. I would like to receive a copy of "the science" that they reference in this statement as being clear - that shows that "the benefits (of the vaccines) far outweigh any risk associated with COVID-19 vaccines. Please provide the risk-benefit analysis that they are referring too. (Date Range for Record Search: From 09/30/2021 To 10/31/2021)

We are refusing access to the records for the following reason pursuant to subsection 4(2) of the Act:

- The Act does not apply to the following kinds of information in the custody or control of a public body:
 - published information, material available for purchase and material that is a matter of public record.

Nova Scotia's Covid -19 response actions have been based on national and international guidance from the Public Health Agency of Canada (PHAC) and the World Health Organization (WHO). As the leading agencies for pandemic response nationally and internationally, both PHAC and WHO are continuously reviewing the evolving scientific evidence regarding COVID-19 and the effectiveness of various measures. These reviews are used to form their guidance, position statements, and other documents all of which are in the public domain.

The Government of Canada's resources, including COVID-19 guidance documents, are available at <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html>

The WHO's resources, including COVID-19 technical guidance, are available at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

The Department of Health and Wellness Public Health Branch continues to be in ongoing contact with PHAC and WHO as evidence has evolved throughout the pandemic. This includes as a participant in federal/provincial/territorial conversations, including committees and networks. This has enabled recommendations on public health measures to be informed by the most up to date evidence.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Craig Beaton
Associate Deputy Minister

TAB 10

2021	YAR 510031
<p data-bbox="370 541 1153 615">This is Exhibit 10 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 993 884">Notary Public signature and seal</p>	

EXHIBIT 10

Freedom of Information Document Number 2022-00626-HEA:

On April 21, 2022 I applied for the following FOIPOP information from the Department of Health and Wellness:

Amended May 2, 2022:

A breakdown of the following by month:

1. COVID-19 Cases broken down by month

a) unvaccinated - after having received 0 doses of any COVID-19 vaccine

b) unvaccinated - <14 days post first dose of any COVID-19 vaccine

c) partially vaccinated

d) fully vaccinated

(Date range January 2022- April 2022) A breakdown of the following by month

2. Vaccination Status of COVID-19 Deaths

a) unvaccinated - after having received 0 doses of any COVID-19 vaccine

b) unvaccinated - <14 days post first dose of any COVID-19 vaccine

c) partially vaccinated d) fully vaccinated

(Date range August 2021- April 2022)

3. All COVID-19 hospital visits, hospitalizations and ICU Hospitalizations broken down by month:

a) unvaccinated - after having received 0 doses of any COVID-19 vaccine

b) unvaccinated - <14 days post first dose of any COVID-19 vaccine

c) partially vaccinated d) fully vaccinated

(Date range August 2021- April 2022)

5. A continuation of Table 2, 3 and 4:

a). Number of COVID-19 doses administered, by dose number and month

(Date range January 2022- April 2022)

b). Number of Adverse Events Following COVID-19 Immunization (Non-Serious, Serious and Total), by month

(Date range August 2021- April 2022)

c). Number of Adverse Events Following COVID-19 Immunization, by reaction type and month

(Date range August 2021- April 2022)

6. Cumulative Data on the number of people who have experienced Serious Adverse Events who have

a) died

b) have a permanent disability

c) incapacity

d) required hospitalization or prolongation of existing hospitalization

(Total cumulative value as of April 19, 2022) Date range for record search: August 1, 2021/January 1, 2022 to April 30, 2022.

Exhibit 10 is a true copy of what I received back: **2022-00626-HEA.**

June 3, 2022

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Sent via email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: You are entitled to the information you requested - 2022-00626-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on April 21, 2022.

In your application, you requested a copy of the following records:

Amended May 2, 2022:

A breakdown of the following by month:

1. COVID-19 Cases broken down by month

a) unvaccinated - after having received 0 doses of any COVID-19 vaccine

b) unvaccinated - <14 days post first dose of any COVID-19 vaccine

c) partially vaccinated

d) fully vaccinated

(Date range January 2022- April 2022)

A breakdown of the following by month:

2. Vaccination Status of COVID-19 Deaths

a) unvaccinated - after having received 0 doses of any COVID-19 vaccine

b) unvaccinated - <14 days post first dose of any COVID-19 vaccine

c) partially vaccinated

d) fully vaccinated

(Date range August 2021- April 2022)

3. All COVID-19 hospital visits, hospitalizations and ICU Hospitalizations broken down by month:

a) unvaccinated - after having received 0 doses of any COVID-19 vaccine

b) unvaccinated - <14 days post first dose of any COVID-19 vaccine

c) partially vaccinated

d) fully vaccinated

(Date range August 2021- April 2022)

5. A continuation of Table 2, 3 and 4:

a). Number of COVID-19 doses administered, by dose number and month

(Date range January 2022- April 2022)

*b). Number of Adverse Events Following COVID-19 Immunization (Non-Serious, Serious and Total), by month
(Date range August 2021- April 2022)*

*c). Number of Adverse Events Following COVID-19 Immunization, by reaction type and month
(Date range August 2021- April 2022)*

6. Cumulative Data on the number of people who have experienced Serious Adverse Events who have

a) died

b) have a permanent disability

c) incapacity

d) required hospitalization or prolongation of existing hospitalization

(Total cumulative value as of April 19, 2022)

(Date Range for Record Search: From 12/31/2020 To 4/19/2022)

Responsive records have been located and are attached.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Kathleen Trott
Associate Deputy Minister

Attachment

TAB 11

2021	YAR 510031
<p data-bbox="357 541 1172 615">This is Exhibit 11 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="357 798 1172 802"/> <p data-bbox="568 850 990 892">Notary Public signature and seal</p>	

EXHIBIT 11

Freedom of Information Document Number 2022-01349-HEA:

On August 29, 2022 I applied for the following FOIPOP information from the Department of Health and Wellness:

Copies of all records such as correspondence (emails, and letters) reports and documents sent to/given to/ reported to/received by Dr. Robert Strang from doctors, pharmacies, medical officers, hospital administration, long term care and nursing home administration - on the topic of COVID-19 vaccine adverse events/side-effects and deaths that have occurred since it was rolled out in our province.

This would include correspondence and reports on adverse events and deaths that are temporally associated with the vaccine that have not been clearly attributed to other causes that Dr. Robert Strang has had in his possession.

Date range for record search: December 7, 2020 to June 30, 2021 - First six months of the vaccine rollout.

Exhibit 11 is a true copy of what I received back: **2022-01349-HEA.**

December 21, 2022

Sent via email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: You are entitled to part of the information you requested – 2022-01349-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on August 29, 2022.

In your application, you requested a copy of the following records:

Amended September 21, 2022: Copies of all records such as correspondence (emails, and letters) reports and documents sent to/given to/ reported to/received by Dr. Robert Strang from doctors, pharmacies, medical officers, hospital administration, long term care and nursing home administration - on the topic of COVID-19 vaccine adverse events/side-effects and deaths that have occurred since it was rolled out in our province. This would include correspondence and reports on adverse events and deaths that are temporally associated with vaccine that have not been clearly attributed to other causes that Dr. Robert Strang has had in his possession. (Date Range for Record Search: amended to Dec 7, 2020-June 7, 2021)

You are entitled to part of the records requested. However, we have removed some of the information from this record according to subsection 5(2) of the Act. The severed information is exempt from disclosure under the Act for the following reasons:

- Section 14: advice by or for a public body or minister.
14(1): The head of a public body may refuse to disclose to an applicant information that would reveal advice, recommendations or draft regulations developed by or for a public body or a minister.
- Section 20: unreasonable invasion of personal privacy.
20(1): The head of a public body shall refuse to disclose personal information to an applicant if the disclosure would be an unreasonable invasion of a third party's personal privacy.

The remainder of the records are enclosed.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Kathleen Trott
Associate Deputy Minister

Attachment

TAB 12

2021	YAR 510031
<p data-bbox="370 541 1153 613">This is Exhibit 12 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 993 884">Notary Public signature and seal</p>	

EXHIBIT 12

Freedom of Information Document Number 2022-01408-HEA:

On September 8, 2022 I applied for the following FOIPOP information from the Department of Health and Wellness:

The number of people who have died a) 14 days, b) one month, c) two months, d) three months, e) four months, f) five months, g) six months, h) seven months, i) eight months, j) nine months, k) 10 months, l) 11 months, m) 12 months, n) 12 months + after getting a COVID-19 vaccine

a.) by dose (broken down into 1 dose less than 14 days, 1 dose and 14 days have passed, 2 doses, 2 doses + booster or three doses, 4 doses)

b.) by age (0-12, 13-20, 21-30, 31-40, 41-50, 51-60, 61-70, 71-80, 81-90, 91-100+)

c.) All information in categories of what they died from – for example, clots, stroke, heart attack, aneurism, still born, myocarditis, (Pfizer lists 8 pages of adverse events in their safety data which I have attached)

Date range for record search: December 13, 2020 to September 6, 2022.

Exhibit 12 is a true copy of what I received back: 2022-01408-HEA.

Please note in the Data Notes on Page 1 that the government is only collecting information on "Other events" within 1 month.

The clear conclusion here is that deaths from the vaccine are not being recorded after one month.

October 11, 2022

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Dear Shelly D Hipson:

Re: You are entitled to the information you requested - 2022-01408-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on September 8, 2022.

In your application, you requested a copy of the following records:

The number of people who have died a) 14 days, b) one month, c) two months, d) three months, e) four months, f) five months, g) six months, h) seven months, i) eight months, j) nine months, k) 10 months, l) 11 months, m) 12 months, n) 12 months + after getting a COVID-19 vaccine

a.) by dose (broken down into 1 dose less than 14 days, 1 dose and 14 days have passed, 2 doses, 2 doses + booster or three doses, 4 doses)

b.) by age (0-12, 13-20, 21-30, 31-40, 41-50, 51-60, 61-70, 71-80, 81-90, 91-100+)

c.) All information in categories of what they died from – for example, clots, stroke, heart attack, aneurism, still born, myocarditis, (Pfizer lists 8 pages of adverse events in their safety data which I have attached) ((Date Range for Record Search: From 12/13/2020 To 9/6/2022)

Responsive records have been located and are attached.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Tim Gregory at 902-223-4957 or by e-mail at timothy.gregory@novascotia.ca, if you need further assistance regarding this application.

Sincerely,

A handwritten signature in blue ink that reads "Kathleen Trott". The signature is written in a cursive, flowing style.

Kathleen Trott
Associate Deputy Minister

Attachment

TAB 13

2021	YAR 510031
<p data-bbox="370 541 1154 615">This is Exhibit 13 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 992 884">Notary Public signature and seal</p>	

EXHIBIT 13

Freedom of Information Document Number: 2021-01663-HEA

On September 14, 2021, I applied for the following FOI information from the Department of Health and Wellness:

According to this article:

<https://www.cbc.ca/news/canada/nova-scotia/nova-scotia-covid-19-vaccine-passport-1.6168189>

"(Dr.)Strang said proof of vaccination will help keep communities safe, ensure children and youth can safely attend school, and protect the health-care system and its providers."

All records that support this statement - that this is true - that proof of vaccination will keep communities safe, ensure children and youth can safely attend school, and protect the health care system and its providers. That proof of vaccination to enter such things as restaurants, bars, concerts, movies and fitness facilities provides safety against COVID-19.

Date range for record search: April 1, 2021 to September 7, 2021.

Exhibit 13 is a true copy of what I received back.

October 14, 2021

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Dear Shelly D Hipson:

Re: We do not have the information you asked for – 2021-01663-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on September 14, 2021.

In your application, you requested a copy of the following records:

According to this article:

<https://www.cbc.ca/news/canada/nova-scotia/nova-scotia-covid-19-vaccine-passport-1.6168189>

FROM THE ARTICLE: "Strang said proof of vaccination will help keep communities safe, ensure children and youth can safely attend school, and protect the health-care system and its providers."

All records that support this statement - that this is true - that proof of vaccination will keep communities safe, ensure children and youth can safely attend school, and protect the health care system and its providers. That proof of vaccination to enter such things as restaurants, bars, concerts, movies and fitness facilities provides safety against COVID-19. ((Date Range for Record Search: From 4/1/2021 To 9/7/2021)

After a file search, we have located no records responsive to your application. Therefore, it is my understanding, pursuant to clause 7(2)(b) of the Act, that Health and Wellness does not have custody or control of records which would respond to your application.

I am unaware of a department or agency which would hold such records.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name,

address or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Tim Gregory at 902-424-3773 or by e-mail at timothy.gregory@novascotia.ca, if you need further assistance regarding this application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig Beaton". The signature is stylized and written in a cursive-like font.

Craig Beaton
Associate Deputy Minister

Attachment

TAB 14

2021	YAR 510031
<p data-bbox="358 541 1179 615">This is Exhibit 14 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="358 800 1179 804"/> <p data-bbox="574 852 992 884">Notary Public signature and seal</p>	

EXHIBIT 14

Freedom of Information Document Number: 2021-00345-HEA

On February 27, 2023, I applied for the following FOIPOP information from the Department of Health and Wellness:

All emails, records, reports, and correspondence sent and received by Dr. Shelley Deeks, Deputy Chief Medical Officer of Health, on the topic of people who had Adverse Events Following Immunization (AEFI) after receiving any of the COVID-19 vaccines. (no personal identifying information.)

Date Range for Record Search: From 12/15/2020 To 02/26/2023)

Exhibit 14 is a true copy of what I received back

April 28, 2023

Shelly Hipson
Sent via email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: You are entitled to part of the information you requested – 2023-00345-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* on February 27, 2023.

In your application, you requested a copy of the following records:

All emails, records, reports, and correspondence sent and received by Dr. Shelley Deeks, Deputy Chief Medical Officer of Health, on the topic of people who had Adverse Events Following Immunization (AEFI) after receiving any of the COVID-19 vaccines. (no personal identifying information.)

(Date Range for Record Search: From 12/15/2020 To 02/26/2023)

You are entitled to part of the records requested. However, we have removed some of the information from this record according to subsection 5(2) of the Act. The severed information is exempt from disclosure under the Act for the following reasons:

- Section 14: advice by or for a public body or minister.
14(1), The head of a public body may refuse to disclose to an applicant information that would reveal advice, recommendations or draft regulations developed by or for a public body or a minister.
- Section 18: Health and Safety
18(1)(a), Threaten anyone else's safety or mental or physical health.
- Section 20: unreasonable invasion of personal privacy.
20(1), The head of a public body shall refuse to disclose personal information to an applicant if the disclosure would be an unreasonable invasion of a third party's personal privacy.

Information that is not regarding people who had Adverse Events Following Immunization (AEFI) after receiving any of the COVID-19 vaccines has been marked as not responsive. The remainder of the records are enclosed.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which

is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Yours truly,



Kathleen Trott
Associate Deputy Minister

Attach.

TAB 15

2021	YAR 510031
<p data-bbox="370 541 1154 615">This is Exhibit 15 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 992 884">Notary Public signature and seal</p>	

EXHIBIT 15

Freedom of Information Document Number: 2021-02124-HEA

On December 22, 2022, I applied for the following FOIPOP information from the Department of Health and Wellness:

Copies of ALL records such as correspondence (emails, and letters), reports and documents, briefings sent to/given to/ reported to/received by Dr. Robert Strang from doctors, pharmacies, medical officers, hospital administration, long term care and nursing home administration and anyone else who was responsible for rolling out the vaccines in this province - on the topic of COVID-19 vaccine adverse events/side-effects and deaths that have occurred since it was rolled out in our province.

This would include correspondence and reports on adverse events and deaths that are temporally associated with vaccine that have not been clearly attributed to other causes that Dr. Robert Strang, Shelley Deeks, and the Minister have had in their possession.

Date Range for Record Search: amended to June 7, 2021 to September 7, 2021

Exhibit 15 is a true copy of what I received back.

March 2, 2023

Shelly Hipson
Sent via email: shellyhipson@gmail.com

Dear Shelly Hipson:

Re: You are entitled to part of the information you requested – 2022-02124-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* (the Act) on December 22, 2022.

In your application, you requested a copy of the following records:

Copies of ALL records such as correspondence (emails, and letters), reports and documents, briefings sent to/given to/ reported to/received by Dr. Robert Strang from doctors, pharmacies, medical officers, hospital administration, long term care and nursing home administration and anyone else who was responsible for rolling out the vaccines in this province - on the topic of COVID-19 vaccine adverse events/side-effects and deaths that have occurred since it was rolled out in our province. This would include correspondence and reports on adverse events and deaths that are temporally associated with vaccine that have not been clearly attributed to other causes that Dr. Robert Strang, Shelley Deeks, and the Minister have had in their possession. (Date Range for Record Search: amended to June 7, 2021 to September 7, 2021)

You are entitled to part of the records requested. However, we have removed some of the information from this record according to subsection 5(2) of the Act. The severed information is exempt from disclosure under the Act for the following reason:

- Section 20: unreasonable invasion of personal privacy.
20(1): The head of a public body shall refuse to disclose personal information to an applicant if the disclosure would be an unreasonable invasion of a third party's personal privacy.

The remainder of the records are enclosed.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name,

address, or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Melinda Frelick at 902-424-6920 or by e-mail at melinda.frelick@novascotia.ca, if you need further assistance regarding this application.

Yours truly,



Kathleen Trott
Associate Deputy Minister

Attachment

TAB 16

2021	YAR 510031
<p data-bbox="370 541 1153 615">This is Exhibit 16 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 993 884">Notary Public signature and seal</p>	

EXHIBIT 16

Freedom of Information Document Number: 2021-01108-HEA

On June 15, 2021, I applied for the following FOIPOP information from the Department of Health and Wellness:

Copies of All scientific data, correspondence and studies that justify/support the government's actions (1) to lock down and restrict the freedom of movement of Nova Scotians and (2) the wearing of face masks -reduce the spread of Covid-19 held by staff within any program, branch, or office in the department that has been working on the development and implementation of COVID-19 government restrictions as outlined above.

The below excerpt is part of the response I received:

“Nova Scotia's Covid -19 response actions have been based on national and international guidance from the Public Health Agency of Canada (PHAC) and the World Health Organization (WHO). As the leading agencies for pandemic response nationally and internationally, both PHAC and WHO are continuously reviewing the evolving scientific evidence regarding COVID-19 and the effectiveness of various measures.”

Date Range for Record Search: March 1, 2020 to June 3, 2021

Exhibit 16 is a true copy of what I received back.

September 9, 2021

Shelly Hipson
RR3, Shelburne
Nova Scotia B0T1W0

Dear Shelly Hipson:

Re: You are entitled to part of the information you requested – 2021-01108-HEA

The Department of Health and Wellness received your application for access to information under the *Freedom of Information and Protection of Privacy Act* on June 15, 2021.

In your application, you requested a copy of the following records:

All scientific data, correspondence and studies that justify/support the government's actions (1) to lock down and restrict the freedom of movement of Nova Scotians and (2) the wearing of face masks - reduce the spread of Covid-19 held by staff within any program, branch, or office in the department that has been working on the development and implementation of COVID-19 government restrictions as outlined above. (Date Range for Record Search: From 3/1/2020 To 6/3/2021)

You are entitled to part of the records requested. However, we have removed some of the information from this record according to subsection 5(2) of the *Act*. The severed information is exempt from disclosure under the *Act* for the following reasons:

1. Section 14: Advice to public body or minister

Section 14(1) The head of a public body may refuse to disclose to an applicant information that would reveal advice, recommendations or draft regulations developed by or for a public body or a minister.

2. Section 16: Information that would reveal information that is subject to solicitor-client privilege according to Section 16:

Section 16 The head of a public body may refuse to disclose to an applicant information that is subject to solicitor-client privilege.

3. Section 20: Information that would be an unreasonable invasion of the privacy of individuals mentioned in the records

Section 20 (1) The head of a public body shall refuse to disclose personal information to an applicant if the disclosure would be an unreasonable invasion of a third party's personal privacy

We are refusing access to a portion of the records for the following reason pursuant to subsection 4(2) of the *Act*:

Section 4(2)(a): Published Material

The Act does not apply to the following kinds of information in the custody or control of a public body:

- published information, material available for purchase and material that is a matter of public record.

The remainder of the records are enclosed.

Nova Scotia's Covid - 19 response actions have been based on national and international guidance from the Public Health Agency of Canada (PHAC) and the World Health Organization (WHO). As the leading agencies for pandemic response nationally and internationally, both PHAC and WHO are continuously reviewing the evolving scientific evidence regarding COVID-19 and the effectiveness of various measures. These reviews are used to form their guidance, position statements, and other documents all of which are in the public domain.

The Government of Canada's resources, including COVID-19 guidance documents, are available at <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19.html>.

The WHO's resources, including COVID-19 technical guidance, are available at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>.

The Department of Health and Wellness Public Health Branch continues to be in ongoing contact with PHAC and WHO as evidence has evolved throughout the pandemic. This includes as a participant in federal/provincial/territorial conversations, including committees and networks. This has enabled recommendations on public health measures to be informed by the most up to date evidence.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Tim Gregory at 902-424-3773 or by e-mail at timothy.gregory@novascotia.ca, if you need further assistance regarding this application.

Sincerely,



Craig Beaton
Associate Deputy Minister

Attachment

TAB 17

2021	YAR 510031
<p data-bbox="370 541 1154 615">This is Exhibit 17 referred to in the affidavit of Shelly Hipson sworn before me on November _____, 2024</p> <hr data-bbox="375 800 1154 804"/> <p data-bbox="574 852 992 884">Notary Public signature and seal</p>	

EXHIBIT 17

Freedom of Information Document Number: 2022-00455-SNSIS

On March 15th, 2022 I applied for the following FOIPOP information from Service Nova Scotia Internal Services:

Records providing total number of deaths per month in Nova Scotia for 2019, 2020, 2021 and so far in 2022.

Records that show a breakdown with totals of cause of deaths for 2019, 2020 and 2021. (For example a breakdown of how many died of cancer, heart disease, suicide, drug overdose, kidney failure etc. for the above years)

Date range for record search: 2019, 2020, 2021 and so far in 2022.

Exhibit 17 is a true copy of the email that I received back: 2022-00455-SNSIS.

Note: 2019 and 2020 are complete. 2021 and 2022 are incomplete)

Please note:

1. Years 2021 and 2022 are incomplete
2. Diseases of the Respiratory System are identified in Section "X" of this document.
3. COVID-19 is considered a disease of the respiratory system.
4. In 2019, 9772 people died in Nova Scotia from all causes.
5. In 2019, there were 455 males and 441 females who died from diseases of the respiratory system which totals 896 deaths.
6. Zero were from COVID-19.
7. In 2020, 9,964 people died in Nova Scotia from all causes.
8. In 2020, there were 433 males and 394 females who died from diseases of the respiratory system which totals 827 deaths.
 - a) The data shows that 66 died of COVID-19 but this number did not increase the overall deaths from respiratory illnesses.
 - b) COVID-19 totalled 66 deaths out of the 9,964 total deaths in the province.
 - c) The increase of 192 overall deaths between years 2019 and 2020 are not due to deaths from diseases of the respiratory system.
 - d) In the pandemic year, 2020, deaths from Diseases of the Respiratory System decreased by 69 deaths.
 - e) This record contributes to the conclusion that there was no evidence of a serious pandemic involving the respiratory system in 2020.

March 30, 2022

Shelly D Hipson
RR3
Shelburne, B0T 1W0

Dear Shelly D Hipson:

Re: You are entitled to the information you requested - 2022-00455-SNSIS

Service Nova Scotia and Internal Services received your application for access to information under the *Freedom of Information and Protection of Privacy Act* on March 15, 2022.

In your application, you requested a copy of the following records:

Records providing total number of deaths per month in Nova Scotia for 2019, 2020, 2021 and so far in 2022.

Records that show a breakdown with totals of cause of deaths for 2019, 2020 and 2021. (For example a breakdown of how many died of cancer, heart disease, suicide, drug overdose, kidney failure etc. for the above years) (Date Range for Record Search: From 12/31/2019 To 3/11/2022)

Responsive records have been located and are attached. Please note that the figures for the years 2021 and 2022 should be considered provisional as the information is not yet complete.

You have the right to ask for a review of this decision by the Information Access and Privacy Commissioner (formerly the Review Officer). You have 60 days from the date of this letter to exercise this right. If you wish to ask for a review, you may do so on Form 7, a copy of which is attached. Send the completed form to the Information Access and Privacy Commissioner, P.O. Box 181, Halifax, Nova Scotia B3J 2M4.

Please be advised that a de-identified copy of this disclosure letter and the attached response to your FOIPOP application will be made public after 14 days. The package will be posted online at <https://openinformation.novascotia.ca/>. The letter will not include your name, address or any other personal information that you have supplied while making your application under FOIPOP.

Please contact Micah Pirk O'Connell at 902-424-4879 or by e-mail at Micah.PirkOConnell@novascotia.ca, if you need further assistance regarding this application.

Yours truly,



Joanne Munro
Deputy Minister

Attach.