

Court File No: CV-21-00673636-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N:**

**CANADIAN FRONTLINE NURSES, SARAH CHOUJOUNIAN, KRISTEN NAGLE,  
and KRISTAL PITTER**

**Plaintiffs  
(Responding Parties)**

**- and -**

**CANADIAN NURSES ASSOCIATION,  
TIM GUEST, MICHAEL VILLENEUVE, TOGETHER NEWS INC.  
o/a COMOXVALLEY.NEWS and o/a VANISLE.NEWS, and JOHN DOE**

**Defendants  
(Moving Parties)**

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**JOINT SUPPLEMENTARY MOTION RECORD  
(Transcripts of Cross-Examinations)  
VOLUME 2 of 3**

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Date: August 10, 2022

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**TAB 4**

# **Canadian Frontline Nurses et al. v. Canadian Nurses Association et al.**

SARAH CHOUJOUNIAN  
on Friday, July 22, 2022



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Court File No. CV-21-00673636-0000

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SUPERIOR COURT OF JUSTICE

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Plaintiffs

- and -

CANADIAN NURSES ASSOCIATION,  
TIM GUEST, MICHAEL VILLENEUVE, TOGETHER NEWS INC.  
o/a COMOXVALLEY NEWS and o/a VANISLE NEWS,  
and JOHN DOE

Defendants

-----

--- This is the Cross-Examination On Affidavit  
Sworn on July 14, 2022, of SARAH CHOUJOUNIAN, taken  
via Neesons, a Veritext Company's virtual platform,  
on the 22nd day of July, 2022.

-----



A P P E A R A N C E S:

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REPORTED BY: Janet Belma, CSR, B.Ed.

## I N D E X

WITNESS: SARAH CHOUJOUNIAN

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\*\*The following list of undertakings, advisements  
and refusals is meant as a guide only for the  
assistance of counsel and no other purpose\*\*

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and appear on the following pages: 17:8, 18:21,  
21:3, 21:16, 22:8, 22:11, 22:16, 37:8, 38:15,  
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None

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appear on the following pages: 25:2

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1 Affirmed: Sarah Choujounian

2 COURT REPORTER: Counsel, as you all  
3 know, because we are using a virtual connection,  
4 everyone is going to have to be more conscious than  
5 ever of not speaking over each other. If I cannot  
6 hear the end of a question or the beginning of an  
7 answer, you are going to have a very poor record.  
8 If I have to consistently interrupt because I  
9 cannot hear or understand something that is said,  
10 you will not have a good examination flow.

11 If there is an objection, I must be able  
12 to hear it and know who is objecting. If I do have  
13 to interrupt, please be patient and understand that  
14 my goal is to provide you with a perfect record of  
15 these proceedings.

16 Please move your papers and/or legal  
17 pads away from your phone or computer so there is  
18 no ambient noise. From time to time, we have  
19 noticed the audio can be affected, and if so, we  
20 may need to stop the proceedings and wait a moment  
21 for the audio to improve either by reconnecting or  
22 asking that everyone use the conference call number  
23 if you are using computer audio.

24 Would our witness please identify  
25 yourself and spell your first and last name, ma'am.

1 And if you could just do that one more time, Sarah,  
2 please.

3 MR. DEARDEN: You're on mute, Sarah.

4 THE WITNESS: Sarah Choujounian.

5 COURT REPORTER: And just spell it,  
6 please.

7 THE WITNESS: I'm sorry. I didn't hear  
8 that.

9 COURT REPORTER: If you could spell it,  
10 please, ma'am.

11 THE WITNESS: S-A-R-A-H Choujounian,  
12 C-H-O-U-J-O-U-N-I-A-N.

13 COURT REPORTER: Thank you very much.

14 If there are no questions about the  
15 witness's identity, we can begin, counsel.

16 MR. DEARDEN: Thank you, Madam Court  
17 Reporter.

18 BY MR. DEARDEN:

19 1 Q. Ms. Choujounian, you swore an  
20 affidavit on July 14, 2022, that consists of 39  
21 paragraphs and Exhibits A to D?

22 A. Yes.

23 2 Q. And is there anything in your  
24 affidavit that you want to retract or correct?

25 A. No.

1                   3                   Q.    Now, Tab 1 of the documents brief  
2                   which you can't open, right?

3                   A.    Right.

4                   4                   Q.    Okay.  Well, that's your Notice of  
5                   Examination.

6                   MR. DEARDEN:  Which I would ask Madam  
7                   Court Reporter be marked as Exhibit 1, the Notice  
8                   of Examination of Sarah Choujounian required to  
9                   attend today in this cross-examination on her  
10                  affidavit.

11                  COURT REPORTER:  All right.

12                  EXHIBIT 1:  The Notice of Examination  
13                  of Sarah Choujounian

14                  MR. DEARDEN:  And I have asked for  
15                  production of a number of documents:  termination  
16                  of your employment, matters relating to College of  
17                  Nurses of Ontario, charges that may be against you,  
18                  and the organization and planning of rallies on or  
19                  before September 9th.

20                  Counsel, I have received an email from  
21                  you last night, July 21st, 2022.  It's 7:58 p.m.  
22                  You have no objection to producing documents  
23                  relating to termination of employment, but you are  
24                  objecting to producing documents relating to  
25                  College of Nurses of Ontario investigations and

1 proceedings involving practice and conduct of all  
2 three plaintiffs, and you're doing that on the  
3 basis of relevance. Obviously, we disagree.

4 Some of The College of Nurses documents  
5 are actually public documents in divisional court  
6 applications that have been filed, and they've been  
7 referenced in the affidavits.

8 So my position, counsel, is that, one,  
9 if you don't produce these documents that I've  
10 requested, I'm going to ask that the paragraphs  
11 that deal with anything to do the with The College  
12 of Nurses be struck and as also an adverse  
13 inference be drawn.

14 In other words, I don't intend to get  
15 into an argument here. We only received  
16 termination letters, and I'll proceed with what  
17 I've got now, and we'll see what we do later. Does  
18 that make sense? That was a question for you,  
19 Mr. Boissonneau-Lehner.

20 MR. BOISSONNEAU-LEHNER: I'm sorry. I  
21 was on mute. I was speaking, but I was on mute.  
22 So I also don't want to get into a debate on the  
23 record on this, but I just do want to clarify,  
24 since you've said I just rejected The College of  
25 Nurses documents on relevance. I did in terms of

1 the -- because you have asked for every College of  
2 Nurses -- documents pertaining to every College of  
3 Ontario investigation pertaining to all of my  
4 clients. I do not see the relevance of that.

5 The other issue is I take your point  
6 that documents were filed in a judicial review in  
7 an unrelated manner, but that may or may not  
8 contain the full records. In fact, I'm sure it  
9 does not, and what I took under advisement is -- so  
10 the problem is that the assertion that these  
11 documents are confidential is not my -- it's not my  
12 confidentiality to waive. It's The College of  
13 Nurses.

14 With respect to the references at  
15 paragraph 37 and 38, as I indicated in my email, I  
16 have taken under advisement producing the portion  
17 of The College of Nurses complaints that deal with  
18 the September 9th publication by the Canadian  
19 Nurses Association [sic]. And the reason that I've  
20 taken that under advisement is I want to consult  
21 with the Canadian Nurses Association who are  
22 maintaining confidentiality over these documents.  
23 And I will get back to you once I sort that out.

24 MR. DEARDEN: I think you meant College  
25 of Nurses of Ontario as opposed to the Canadian



1 Nurses Association.

2 MR. BOISSONNEAU-LEHNER: Yes, that's  
3 what I meant.

4 MR. DEARDEN: I get that, but just  
5 to -- in response to what you just said, I want the  
6 entire documents that I've requested. You're not  
7 going to get to cherry pick the parts that somehow  
8 might reference the Canadian Nurses Association  
9 statement and not give me the entire package, so  
10 just so you know that.

11 And the other, of course, a huge issue  
12 here is reputation. You have to prove that there  
13 is serious harm caused by the CNA statement versus  
14 other causes of damage to reputation, and this is  
15 why I say these proceedings of The College are  
16 highly relevant.

17 So why don't we -- I'd like to enter as  
18 Exhibit 2 the email that you sent to us last night,  
19 counsel, which would be --

20 MR. BOISSONNEAU-LEHNER: No problem.

21 MR. DEARDEN: So it's Alexander  
22 Boissoneau-Lehner, email sent on July 21st, 2022,  
23 at 7:58 p.m. to myself and Mr. Champ and others.  
24 We'll enter that as Exhibit 2.

1 EXHIBIT 2: July 21, 2022 Email from  
2 Mr. Boissoneau-Lehner to Mr. Dearden at  
3 7:58 p.m.

4 BY MR. DEARDEN:

5 5 Q. And, Ms. Choujounian, I'm not  
6 going to ask you questions in every area like  
7 termination of employment. My colleague, Mr. Champ  
8 who represents Together News, is going to be asking  
9 you questions in there. Try to avoid overlap in  
10 these cross-examinations, so he'll be asking you  
11 questions after I'm finished.

12 So may I begin, Ms. Choujounian?

13 A. Yes.

14 6 Q. Okay. So The College of Nurses of  
15 Ontario is the governing body for registered  
16 nurses, registered practical nurses, and nurse  
17 practitioners?

18 A. Yes.

19 7 Q. And The College of Nurses enforces  
20 nursing standards of practice and conduct?

21 A. Yes.

22 8 Q. And Tab 7 of the documents brief,  
23 which you can't access but for the others including  
24 your counsel, it is a practice standard code of  
25 conduct of The College of Nurses of Ontario.

1           You're familiar with that code of conduct,  
2           Ms. Choujounian?

3                           A.    Yes.

4           9                   Q.   And I'll just -- on page 2 of that  
5           document, it has a heading, Mission. It says: (as  
6           read)

7                                   "Regulating nursing in the  
8                           public interest."

9           And that's your understanding of what one of the  
10          things The College does?

11                           A.    Yes.

12          10                   Q.   And you agree it also says on page  
13          3: (as read)

14                                   "Our focus at The College of  
15                           Nurses of Ontario is to protect the  
16                           public. One way we do this is by  
17                           setting and enforcing standards of  
18                           practice for all nurses in Ontario."

19          You agree with that?

20                           A.    Yes.

21          11                   Q.   And also on page 3, the fourth  
22          paragraph, it says: (as read)

23                                   "The code puts patients at the  
24                           centre of nursing care. We know  
25                           it's important that the public has

1 confidence in the care nurses  
2 provide. Public safety is our top  
3 priority. This code of conduct  
4 supports nurses to provide patients  
5 with the care they expect and  
6 deserve."

7 Do you agree with that?

8 A. Yes.

9 12 Q. And do you agree that as a nurse  
10 governed and regulated by The College of Nurses of  
11 Ontario that you must abide by this College code of  
12 conduct?

13 A. Yes.

14 13 Q. Now, on The College's website,  
15 they have --

16 MR. DEARDEN: And, counsel, you'll find  
17 this at Tab 6 of the Book of Documents.

18 BY MR. DEARDEN:

19 14 Q. -- Find a Nurse. They have a  
20 section there where you can Find a Nurse, and you  
21 can enter the name. We're showing it to you on the  
22 screen now. So it allows a member of the public to  
23 access a register that provides information about a  
24 nurse's status through "Find a Nurse" which you see  
25 in the top left-hand corner of the document that's

1           being shown to you on the screen. Are you familiar  
2           with that?

3                           A.    Yes.

4       15                   Q.    So and my understanding is every  
5           nurse registered in Ontario will have a profile on  
6           this Find a Nurse, correct?

7                           A.    Yes.

8       16                   Q.    And I will want as Exhibit 3, Tab  
9           6 of the Book of Documents, which is Find a Nurse,  
10          for Choujounian-Abulu.

11                          MR. DEARDEN: So it's hyphenated, Madam  
12           Court Reporter, with a A-B-U-L-U. Well, actually,  
13           you can see it on the screen too.

14                          COURT REPORTER: Yes. Thank you.

15                          MR. DEARDEN: So that's Exhibit 3,  
16           Madam Court Reporter?

17                          COURT REPORTER: Yes, that's Exhibit 3.

18                          EXHIBIT 3: Find a Nurse for Sarah  
19           Choujounian-Abulu

20                          BY MR. DEARDEN:

21       17                   Q.    And on this page, it says you are  
22           a registered practical nurse. Is that accurate?

23                           A.    Yes.

24       18                   Q.    So paragraph 2 of your affidavit  
25           is not accurate, correct? You say you're a

1 registered nurse.

2 A. Well, a registered nurse could  
3 mean just registered with The College as a nurse,  
4 so I --

5 19 Q. I thought that registered nurse,  
6 RN, was a different level of nursing than a  
7 registered --

8 A. It is.

9 20 Q. -- practical nurse which is an  
10 RPN?

11 A. Yes, it is, but I also understood  
12 that it was maybe said in a more general way as I'm  
13 registered as a nurse with The College.

14 21 Q. Okay. So to be accurate, that  
15 should be Registered Practical Nurse in paragraph 2  
16 of your affidavit, correct?

17 A. Yes.

18 22 Q. Okay. Now, Tab 10 of the Book of  
19 Documents is Exhibit D to your affidavit, which I  
20 assume you have in front of you. And that is a  
21 College of Nurses of Ontario appointment of an  
22 investigator. Do you have that?

23 A. Yes.

24 23 Q. Or can you see that on the screen?

25 A. Just a minute. Yes.

1           24                   Q.    And on October 7, 2021, which is  
2                           the date of this appointment of investigator: (as  
3                           read)

4                                   "A person was appointed to  
5                           enquire into and examine the conduct  
6                           or actions of Sarah  
7                           Choujounian-Abulu pursuant to  
8                           Section 75 to 79 of the Health  
9                           Professions Procedural Code to  
10                          ascertain whether Sarah  
11                          Choujounian-Abulu has committed an  
12                          act of professional misconduct or is  
13                          incompetent in respect of (1)  
14                          demonstration of knowledge, skill,  
15                          and judgment, and (2) professional  
16                          conduct outside of the workplace."

17           You see that?

18                           A.    Yes.

19           25                   Q.    So how many times has The College  
20                           of Nurses appointed an investigator to make  
21                           inquiries and examination about your conduct?

22                           A.    Before this or now?

23           26                   Q.    Anytime.   Yes.

24                           A.    Twice.

25           27                   Q.    Okay.   And is there a case number

1 for this particular appointment of investigator  
2 that we're looking at Exhibit D to your affidavit?

3 A. I'm not sure what you mean by  
4 that.

5 28 Q. The College will assign a case  
6 number. Your counsel might be able to assist or  
7 just tell me that he'll provide me that number.

8 U/T MR. BOISSONNEAU-LEHNER: Yes. I  
9 believe there is a number associated with it, and I  
10 will advise you in writing.

11 MR. DEARDEN: Okay.

12 BY MR. DEARDEN:

13 29 Q. So this appointment that we're  
14 looking at on the screen, it would be one of the  
15 appointments. What's the other one?

16 A. I had one after -- a little bit  
17 after we went to Washington, and then we had  
18 another one after the National Hospital Protest  
19 that came not so long ago.

20 30 Q. So the one that we're looking at  
21 here at Tab 10 of the documents brief and that's on  
22 screen, is that relating to your trip to  
23 Washington?

24 A. I'm pretty sure, yes. Actually,  
25 I'm not sure.



1 MR. DEARDEN: Counsel?

2 MR. BOISSONNEAU-LEHNER: Yes, so I  
3 don't believe either of the -- well, maybe if we  
4 should put Ms. Choujounian in a breakout room  
5 because I don't want to...

6 MR. DEARDEN: No. I'm okay with that.  
7 I just want to figure out what's going on. So I  
8 don't care if you answer.

9 MR. BOISSONNEAU-LEHNER: I'm not sure  
10 either, but my understanding is that there are two  
11 investigations, neither of which deal directly with  
12 the trip to Washington. That's my understanding.

13 But this is the second, and the first  
14 Notice of Appointment of an investigator happened  
15 shortly, and I don't have the date for you, but  
16 happened shortly upon -- shortly after  
17 Ms. Choujounian returned from Washington in  
18 January, but I don't have the exact date, and I  
19 don't have that notice handy.

20 MR. DEARDEN: So you'll let me know.

21 U/T MR. BOISSONNEAU-LEHNER: Yes. So what  
22 is it that you would like to know, Mr. Dearden?

23 MR. DEARDEN: Well, I'm told that there  
24 were two investigations --

25 MR. BOISSONNEAU-LEHNER: Yes.

1 MR. DEARDEN: -- or two investigators  
2 appointed. I only have one appointment of  
3 investigator. I'd like the other appointment of  
4 investigator document, but I'd like to know what  
5 both of them are relating to.

6 And as I understand what  
7 Ms. Choujounian said is there was something to do  
8 with the Washington trip, but also there was one  
9 that arrived shortly after the National Hospital  
10 Protest.

11 MR. BOISSONNEAU-LEHNER: I believe this  
12 is the one that was after the National Hospital  
13 Protest.

14 MR. DEARDEN: And is that the September  
15 1st, 2021 rallies and protests?

16 MR. BOISSONNEAU-LEHNER: Yes, that, and  
17 I understand there was also a rally on September  
18 13th -- I don't know -- but, yes, after those  
19 rallies.

20 BY MR. DEARDEN:

21 31 Q. You agree with that,  
22 Ms. Choujounian?

23 A. Yes. And I'd also agree that  
24 it -- it wasn't really just -- it wasn't -- the  
25 first investigation wasn't just focused on the

1 Washington. It was more all -- the social media  
2 posts that I had done. I just think that when we  
3 came back from Washington and all the media went  
4 on, that's when it triggered the investigation.

5 32 Q. And this was around what date, the  
6 first investigation?

7 A. I'm guessing March.

8 33 Q. Of what year?

9 A. 2021.

10 34 Q. And the second investigation?

11 A. Would be this one, I guess,  
12 October.

13 35 Q. In the one we're looking at, at  
14 Tab 10 of the documents brief, do you know who the  
15 complainants were?

16 A. It was a lot of the exhibits from  
17 my -- our social media from The College, and I  
18 think there was a few complaints from people in the  
19 public.

20 36 Q. Did any organization like a nurses  
21 union complain for the one that we're looking at  
22 now that was issued October 7, 2021?

23 A. I'm not sure. There's so many  
24 pages. I can go through all of them.

25 37 Q. And just let me know who

1           complained and what they complained about. Can you  
2           do that?

3           U/T           A. I -- I think it's The College that  
4           is investigating me more than anyone complaining  
5           about me.

6           38           Q. Well, the complaint triggers the  
7           appointment of the investigator, and so somebody  
8           had them do something, had The College do something  
9           that resulted in the appointment of two  
10          investigators about your conduct. And I'm  
11          wondering who the complainants were in both of  
12          those investigations.

13                   A. I can't answer that.

14          39           Q. You can't answer it now, but will  
15          you look it up for me?

16          U/T           A. Yes.

17          40           Q. Okay. And on the first  
18          investigation, did an investigator issue a report  
19          that went to the Inquiries, Complaints and Reports  
20          Committee?

21                   A. I'm not sure what that means.

22          41           Q. The investigator of what we're  
23          calling you're first investigation, the March 20,  
24          2021, as you recall, would do an investigation, and  
25          then they do a report. So do you know if a report

1 was issued?

2 A. I think so.

3 42 Q. And do you know what date that was  
4 for the first investigator?

5 A. No. I don't have that information  
6 right now.

7 43 Q. So can you get it for me?

8 U/T A. Yes.

9 44 Q. And can you produce the report?

10 MR. BOISSONNEAU-LEHNER: If --

11 U/T THE WITNESS: I guess so.

12 MR. BOISSONNEAU-LEHNER: I don't know  
13 if you want my assistance in this at this point to  
14 try to --

15 MR. DEARDEN: Sure. Yes. Yes.

16 U/T MR. BOISSONNEAU-LEHNER: All right. So  
17 it's the first -- in terms of the appointment of  
18 the investigator, my understanding is that both the  
19 initial appointment and the second appointment are  
20 Registrar -- initiated by the Registrar of The  
21 College as opposed to by individual complainants.  
22 So the Registrar -- but of the disclosure package  
23 that was received, there are, of course, complaints  
24 that were registered with The College. And perhaps  
25 the Registrar initiated an investigation on the

1 basis of those complaints, but there's two types of  
2 complaints: ones that are initiated by a  
3 complainant and one that's initiated by the  
4 Registrar. And these complaints are initiated by  
5 the Registrar, so I just wanted to clarify that.

6 And then in terms of the first report,  
7 I do not believe -- I will advise if this is  
8 incorrect, but I do not believe there is a report  
9 from the ICRC, but that because that has -- if you  
10 go back to Ms. Choujounian's practice status,  
11 you'll see that it's in front of the Discipline  
12 Committee, and there hasn't been a decision on that  
13 yet, so it's skipped the ICRC process.

14 MR. DEARDEN: Is the Discipline  
15 Committee dealing with both investigations? Do  
16 they get merged into one Discipline Committee  
17 hearing that's happening in November?

18 MR. BOISSONNEAU-LEHNER: Yes? You're  
19 asking me? Okay. So, no. They are two separate  
20 investigations. There has not been a response to  
21 the second one of October 7th, of 2021; that's  
22 ongoing, nor has there been a discipline hearing  
23 with relation to the first complaint. So they are  
24 two separate matters. They have not been merged.

25 MR. DEARDEN: Okay. And is the first

1 investigation concluded?

2 MR. BOISSONNEAU-LEHNER: The first  
3 investigation is concluded in the sense that it's  
4 being referred to the Discipline Committee.

5 MR. DEARDEN: And the second one is  
6 what we were looking at, at Tab 10, the October 7,  
7 2021, appointment of investigator, and that's  
8 ongoing?

9 MR. BOISSONNEAU-LEHNER: That's  
10 ongoing. It has not been moved up to the  
11 Inquiries, Complaints, and Reports Committee.

12 MR. DEARDEN: Sorry. Say that again.

13 MR. BOISSONNEAU-LEHNER: It has not  
14 been referred to the Inquiries, Complaints, and  
15 Reports Committee as of yet, though it's not -- I  
16 guess, I don't know whether they're continuing to  
17 investigate this, but there isn't a report yet from  
18 the ICRC.

19 MR. DEARDEN: What about from the  
20 investigator to the ICRC?

21 MR. BOISSONNEAU-LEHNER: I don't know  
22 whether the investigator has forwarded a report to  
23 the ICRC or not. I just -- I don't know how that  
24 works, to be honest.

25 MR. DEARDEN: But you don't have that

1 report right now?

2 R/F MR. BOISSONNEAU-LEHNER: What I have,  
3 and I'm still maintaining my objection on this, is  
4 I have a confidential disclosure package that was  
5 provided by The College with respect to the  
6 investigation undertaken by the investigator. And  
7 we need to -- and Ms. Choujounian has been invited  
8 to respond to the information in that disclosure or  
9 report and has not yet done so. That's the status  
10 as best as I understand it.

11 MR. DEARDEN: Okay.

12 BY MR. DEARDEN:

13 45 Q. So let's go back to Tab 6, which  
14 is the Find a Nurse, and the third page in of Find  
15 a Nurse for Sarah Choujounian, it has a heading,  
16 CNO Hearings Pending, and that is before the  
17 Discipline Committee. And that hearing is going to  
18 happen in November 2022, and the details are: (as  
19 read)

20 "It is alleged that the member  
21 committed professional misconduct  
22 between October 2020 and February  
23 2021 in that she contravened the  
24 standards of practice of the  
25 profession and engaged in



1 disgraceful, dishonourable, or  
2 unprofessional conduct when she  
3 publicly made or shared statements  
4 or caused other to make such  
5 statements on her behalf which  
6 contained information which she knew  
7 or ought to have known was  
8 inaccurate, false, and/or misleading  
9 in relation to the COVID-19 pandemic  
10 and/or the public health response to  
11 the COVID-19 pandemic and/or which  
12 encouraged noncompliance of public  
13 health orders in relation to the  
14 COVID-19 pandemic."

15 And the Notice of Hearing, Ms. Choujounian, there's  
16 a link that's in very light print on the screen  
17 that you're looking at, but that's a link to the  
18 full Notice of Hearing.

19 A. Right.

20 46 Q. Okay?

21 A. Yes.

22 47 Q. And a member of the public can  
23 click on that link and read the full Notice of  
24 Hearing that you received from The College of  
25 Nurses, correct?

1 A. Yes.

2 48 Q. And we have that Notice of Hearing  
3 at Tab 17 of the documents brief. You see that on  
4 the screen?

5 A. Yes.

6 49 Q. And a member of the public can  
7 read the two allegations that you're looking at  
8 right now on the screen, correct?

9 A. Yes.

10 50 Q. And Allegation 1 is that you've:  
11 (as read)

12 "Committed an act of  
13 professional misconduct while  
14 registered as a Registered Practical  
15 Nurse. You contravened the standard  
16 of practice of the profession or  
17 failed no meet the standards of  
18 practice of the profession in that  
19 you publicly made or shared  
20 statements as set out in Appendix A  
21 which contained information which  
22 you knew or ought to have known was  
23 inaccurate, false, or misleading in  
24 relation to the COVID-19 pandemic  
25 and/or the public health response to

1 the COVID-19 pandemic and/or which  
2 encourage noncompliance of public  
3 health orders in relation to the  
4 COVID-19 pandemic."

5 That's the first allegation against you, correct?

6 A. Correct.

7 51 Q. And the second one is that you:  
8 (as read)

9 "Committed an act of  
10 professional misconduct while  
11 registered as a registered practical  
12 nurse. You engaged in conduct  
13 relevant to the practice of nursing  
14 that would reasonably be regarded by  
15 members of the profession as  
16 disgraceful, dishonourable, or  
17 unprofessional in that you publicly  
18 made or shared statements as set out  
19 in Appendix A."

20 And I won't bother reading the rest of the second  
21 allegation. But Appendix A is found on the next  
22 two pages of the Notice, pages 2 and 3, and one of  
23 the statements that The College alleges you made or  
24 shared, Number 1: (as read)

25 "On October 31st, 2020, you

1                   stated wearing a mask is unsafe for  
2                   anyone but has even more detrimental  
3                   effects on a growing child's brain  
4                   development due to a decrease in  
5                   oxygen intake, not only that, but  
6                   facial recognition is super  
7                   important for the social  
8                   development. And let's not forget  
9                   that kids wearing masks makes them  
10                  much harder for us to identify them  
11                  making it easier for predators to  
12                  prey on them."

13                So that's one of the alleged statements you made  
14                there, Ms. Choujounian?

15                        A.    Yes.

16                52                Q.    And Number 2 in Appendix A is by  
17                Twitter. The first one was by a public speech or  
18                YouTube, but the second one, October 26, 2020, is  
19                Twitter. You posted a statement: (as read)

20                                "Very easily understand how  
21                                harmless COVID-19 is compared to  
22                                things like cardiovascular disease."

23                So that's the second statement that The College  
24                alleges you made?

25                        A.    Yes.

53 Q. And then let's go down to 5.

Number 5, you posted a picture with the text: New COVID-19 directives for Peel Region setting out Peel Region's COVID-19 public health directives with the following comment: (as read)

"Here we go again. Are we just going to sit here and let this happen? Do not comply. These mandates and fines do not stand in court. We need to toughen up and disobey."

So that's another statement that you allegedly made on Instagram in November 9, 2020?

A. Yes.

54 Q. Number 6 is a Facebook message November 23, 2020. You posted a link to a video in relation to the COVID-19 pandemic titled: (as read)

"Maker of COVID test says pandemic is biggest hoax ever perpetrated with the following comment: "For those of you who haven't heard the recording yet, here's Dr. Hodkinson, maker of the COVID test, stating that the whole

1 pandemic is a hoax."

2 So that's another statement that The College is  
3 disciplining you about?

4 A. Yes.

5 55 Q. And let's go to number 10, a  
6 December 28, 2020, Instagram, Facebook post. You  
7 posted a statement: (as read)

8 "Reminder: As nurses, we took  
9 an oath to do no harm. Promoting  
10 and advertising taking an  
11 experimental, unsafe vaccine is a  
12 crime against humanity and in direct  
13 conflict with that oath."

14 So that's another statement that you will have to  
15 address during your Discipline Committee hearing,  
16 correct?

17 A. Yes.

18 56 Q. Now, if the Discipline Committee  
19 makes a finding of professional misconduct or  
20 incompetence against you, one of the consequences  
21 is that the Panel can revoke your nurses  
22 certificate of registration?

23 A. I believe so.

24 57 Q. And you consider that serious, do  
25 you not?

1 A. Yes.

2 58 Q. And that also means you can no  
3 longer practice nursing or use the title nurse in  
4 Ontario --

5 A. Yes.

6 59 Q. -- if your certificate of  
7 registration was revoked?

8 A. Yes.

9 60 Q. And you'll also agree that  
10 allegations of professional misconduct that this  
11 Discipline Committee is going to be hearing about  
12 in November are serious allegations?

13 A. Yes.

14 61 Q. And that discipline hearing that's  
15 scheduled for November 2022 will be open to the  
16 public?

17 A. I'm not sure.

18 62 Q. If I'd ask you to confirm that,  
19 you can -- or your counsel can confirm it now  
20 because it is open to the public, but --

21 MR. BOISSONNEAU-LEHNER: That's my  
22 understanding, yes.

23 BY MR. DEARDEN:

24 63 Q. And has The College of Nurses  
25 issued cautions against you?

1 A. Not that I know of. I just got  
2 the investigations.

3 64 Q. The Disciplinary Committee  
4 investigation? Is that what you mean? Or  
5 you're --

6 A. Yes.

7 65 Q. You've been taken to a Discipline  
8 Committee, and there's going to be a hearing?

9 A. Yes.

10 66 Q. Okay. Have you been charged with  
11 any offences?

12 A. No.

13 67 Q. Okay. I'm done with College of  
14 Nurses subject to seeing documentation that I've  
15 requested.

16 Let's switch now to the Canadian  
17 Frontline Nurses. You are a co-founder of Canadian  
18 Frontline Nurses, correct?

19 A. Correct.

20 68 Q. And you are a director of Canadian  
21 Frontline Nurses?

22 A. Correct.

23 69 Q. And how many members did you have  
24 or do you have today, approximately?

25 A. As a director?



1           70                   Q.    No.   Members, members of Canadian  
2                               Frontline Nurses.

3                               A.    I'm not sure.   We have a lot of  
4                               nurses behind us.   We just started a directory with  
5                               members.   I don't -- I'm not sure if that's what  
6                               you're asking, but we have about 40 nurses on it  
7                               right now.   We just started the directory about a  
8                               month and a half ago.

9           71                   Q.    Okay.   But what assets does the  
10                              Canadian Frontline Nurses have today such as cash  
11                              and bank accounts or investments?

12                             A.    We have about 15,000 for legal  
13                             fees, and we have -- we -- we're -- we're just  
14                             finished our East Coast tour, so we -- we just  
15                             spent a lot of money.   So we have about 3,000 left  
16                             in our other account, but we have inventory in  
17                             shirts, T-shirts for maybe a little less than  
18                             2,000, toques and stuff like that, and books for  
19                             another thousand maybe.   I -- this is all  
20                             approximate, but approximately.

21           72                   Q.    You have -- okay.   So what do you  
22                              have?   A separate bank account that contains the  
23                              15,000 that's going to pay for legal fees in this  
24                              libel action?   Is that what it's for when you said  
25                              for legal fees?

1 A. No. It's just for the future.

2 This is contingent as I understood.

3 73 Q. Okay. Well, my understanding, and  
4 this is just -- I'm talking Canadian Frontline  
5 Nurses. Isn't there another account for Canadian  
6 Frontline Nurses Constitutional Challenge in the  
7 Federal Court of the emergencies, Emergency  
8 Measures column? Isn't there a separate account  
9 for that?

10 A. Yes, that's why we had opened the  
11 second account for legal fees in case the  
12 government froze our accounts. We were told that  
13 that would be protected since it's for legal fees.

14 74 Q. So is that the 15k account? So  
15 that's --

16 A. Yes.

17 75 Q. That's for the Federal Court  
18 proceeding attacking the constitutionality of  
19 emergency measures that were invoked during the  
20 trucker's protest?

21 A. Yes.

22 76 Q. Okay. And then you have another  
23 bank account that just has \$3,000 in it?

24 A. Approximately, yes.

25 77 Q. Approximately, yes. Any other

1 bank accounts?

2 A. No.

3 78 Q. Any other assets?

4 A. Well, like I said, we have  
5 T-shirts and some merchandise (phonetic) or  
6 maybe --

7 79 Q. Other than that, do you have any  
8 investments? Does the Canadian Frontline Nurses  
9 non-profit corporation have any investments?

10 A. No.

11 80 Q. Has Canadian Frontline Nurses  
12 received any funding or financial assistance from  
13 Global Frontline Nurses?

14 A. No.

15 81 Q. Now, switching to the protests,  
16 Exhibit C to your affidavit, you've attached a  
17 digital flier for Canada-wide protests to take  
18 place September the 1st, 2021, and the locations  
19 are in British Columbia, Alberta, Saskatchewan,  
20 Manitoba, Ontario, Québec, New Brunswick, PEI, Nova  
21 Scotia, and Newfoundland. And did the protests all  
22 occur in the cities and provinces that are listed  
23 in this digital flier?

24 A. Yes.

25 82 Q. And were there any other notices

1 or fliers for these protests distributed besides  
2 the one you attached at Exhibit C?

3 A. No. There's the one main one, and  
4 then we had one for each city that looked alike but  
5 that was just for that city, if that makes sense.

6 83 Q. Okay. Can you produce the city  
7 digital flyers or notices that you just mentioned?

8 U/T A. Yes.

9 84 Q. And do you have video recordings  
10 of any of the rallies that took place on September  
11 1st, 2021, that you list in Exhibit C?

12 A. I have a live of myself in  
13 Montreal, and I -- I believe there's several other  
14 videos from other leaders from across the country,  
15 but I -- I'm not necessarily the one who spoke to  
16 them, so I think maybe Kristen will have those  
17 other ones, yeah.

18 85 Q. And what's your best recollection  
19 of where the other ones took place?

20 A. Around hospitals.

21 86 Q. No. I mean the cities.

22 A. Oh.

23 87 Q. Like, you're telling me you have  
24 video recording of the Montreal rally because you  
25 attended it.

1 A. Yes.

2 88 Q. And you took that video, I take  
3 it?

4 A. Yes.

5 89 Q. And then you're saying Kristen is  
6 going to have a video of rallies taking place in a  
7 different city than Montreal, right?

8 A. Most probably, and I think, like,  
9 we have videos in other cities that people took  
10 while they were there that we can probably gather,  
11 is what I'm saying.

12 90 Q. Okay. Well, I would like them.  
13 I'd like you to produce them to me, so first yours,  
14 the Montreal rally.

15 U/T A. Yes.

16 MR. DEARDEN: That's the first one I'm  
17 requesting, counsel.

18 U/T MR. BOISSONNEAU-LEHNER: Yes.

19  
20 MR. DEARDEN: And then, I don't know --  
21 like, the other videos that Ms. Choujounian just  
22 mentioned in other cities, can they be produced?

23 U/T MR. BOISSONNEAU-LEHNER: With respect  
24 to the video for the Montreal rally that  
25 Ms. Choujounian indicated she has on live, if I can

1 take it off her live, then, of course, I'll produce  
2 it.

3 U/T With respect to all of the other  
4 videos, what I can say is I'll make best efforts to  
5 determine who has these videos and where they are  
6 and if they can be downloaded from social media or  
7 wherever they appear. That may take me some time,  
8 and I can't guarantee that I'll get all of them,  
9 but I'll make some efforts to find.

10 As I understood it, videos posted by  
11 CFN members or -- like, I won't be able to find  
12 every video that anybody has posted regarding --

13 MR. DEARDEN: No. And my request is  
14 not that broad, but I'm talking about the September  
15 1st, 2021 protests that are listed in Exhibit C  
16 digital flier, so when the -- so I'm looking for,  
17 you know, actual video footage of those protests  
18 that took place in those cities on that date, so I  
19 know there's -- that Sarah has Montreal, the  
20 Montreal rally, and then I'm not sure how much  
21 other video there is for the other locations that  
22 are listed in Exhibit C.

23 U/T MR. BOISSONNEAU-LEHNER: And that's my  
24 difficulty. I'm not sure either. But what I'll do  
25 is after these cross-examinations, I'll coordinate

1 with the witnesses and see whether we can -- to the  
2 extent that we can find videos that were taken of  
3 the protests on that -- on that day through social  
4 media accounts, et cetera, I'll endeavour to pull  
5 them and provide them to you.

6 MR. DEARDEN: Thank you.

7 BY MR. DEARDEN:

8 91 Q. So paragraph 28 of your affidavit,  
9 Ms. Choujounian, you say: (as read)

10 "On September 1, 2021, I  
11 observed and spoke to a few nurses  
12 who emerged from the hospital to  
13 join the Montreal rally. I also  
14 witnessed and heard other  
15 individuals who emerged from the  
16 hospital express that they were not  
17 supportive of the Montreal rally."

18 Do you see that, paragraph 28 of your affidavit?

19 A. I can't open it now because it's  
20 just messing up my Internet, but, yes, I remember  
21 saying that.

22 92 Q. Okay. So why were the individuals  
23 who emerged from the hospital not supportive of the  
24 Montreal rally?

25 A. I actually thought it said that

1 it -- they were supportive.

2 93 Q. It says -- I'm looking at the  
3 second sentence of your paragraph 28: (as read)

4 "I also witnessed and heard  
5 other individuals who emerged from  
6 the hospital express that they were  
7 not supportive of the Montreal  
8 rally."

9 A. There was individuals that were  
10 not in support of us being there, yes.

11 94 Q. And why not? Why were they not  
12 supportive?

13 A. Because they thought that we were  
14 there to -- against the healthcare workers inside,  
15 but we weren't.

16 95 Q. Do you recall --

17 A. We were --

18 96 Q. Go ahead.

19 A. We were actually in solidarity  
20 with the nurses inside for them to have a choice  
21 instead of being coerced.

22 97 Q. Do you have recollection of what  
23 was said by these individuals who came out of the  
24 hospital and were not supportive of the Montreal  
25 rally?



1 A. They were just telling us to  
2 leave, screaming at us to leave.

3 98 Q. Were there a few choice adjectives  
4 used by these people that were screaming at you to  
5 leave?

6 A. They were just telling us to  
7 leave, get out of here, or something like that.

8 99 Q. Because in paragraph 32 -- and  
9 I'll read it for you: (as read)

10 "I did not observe anyone who  
11 formed part of the Montreal rally  
12 harass, threaten, or scream insults  
13 at healthcare workers. I did,  
14 however, observe individuals who  
15 emerged from the hospital scream  
16 insults at us."

17 So what were the insults?

18 A. Oh, yeah, so one person did tell  
19 us to F-off, and they were with -- like, they were  
20 with someone else.

21 100 Q. Okay. So I should have asked you  
22 if you they had used any choice verbs rather than  
23 adjectives.

24 A. I guess so.

25 101 Q. Anything else you recall from

1           these individuals who emerged from the hospital  
2           screaming insults at you?

3                   A.    No.  It was really just a few  
4           seconds.  We were walking, so we didn't stay near  
5           them.

6   102                   Q.   And this is outside the hospital?

7                   A.    Yes.

8   103                   Q.   So switching topics now to  
9           mainstream media publication, social media  
10          communications that have been published or  
11          disseminated about you and the Canadian Frontline  
12          Nurses, and there's been a lot.

13                   So let me ask you, have you or the  
14          Canadian Frontline Nurses commenced a libel action  
15          other than this libel action against the Canadian  
16          Nurses Association, Tim Guest, Mike Villeneuve, and  
17          Together News Inc.?

18                   A.    No.

19   104                   Q.   So you're a Plaintiff in only one  
20          libel action, which is this libel action, correct?

21                   A.    I don't really understand the  
22          wording, but I'm thinking yes.

23                   MR. DEARDEN:  Mr. Boissonneau-Lehner?

24                   MR. BOISSONNEAU-LEHNER:  Correct, at  
25          least for -- yes, that's my understanding, only

1 one.

2 MR. DEARDEN: And same thing with the  
3 Canadian Frontline Nurses; to actually start a  
4 libel action claiming a million dollars in damages,  
5 you know, in this case, there's no other action  
6 been commenced by Canadian Frontline Nurses for  
7 defamatory statements made about it; am I correct  
8 on that?

9 MR. BOISSONNEAU-LEHNER: Correct.

10 THE WITNESS: Correct.

11 BY MR. DEARDEN:

12 105 Q. So you, Ms. Choujounian, and  
13 Canadian Frontline Nurses have not sued the  
14 Canadian Broadcasting Corporation or Radio Canada  
15 for libel, correct?

16 A. Correct.

17 106 Q. And you didn't sue Premier Doug  
18 Ford who sent out a tweet that stated: (as read)

19 "The protests we're seeing  
20 outside hospital are selfish,  
21 cowardly, and reckless."

22 You didn't sue him for defamation for that tweet,  
23 did you?

24 A. Correct.

25 107 Q. And there is at Tab 20, the

1 Canadian Broadcasting article, September 13, 2021,  
2 headline: Politicians, medical groups condemn  
3 protests outside hospitals across Canada. It's not  
4 attached as an exhibit to your affidavit, but it is  
5 Exhibit B to Ms. Nagle's affidavit.

6 And if we could go to page 4 of 7,  
7 there should be a quote from a Vikki Leung, a  
8 Toronto emergency nurse. So it says there: (as  
9 read)

10 "At least one Toronto emergency  
11 nurse agrees there's been harassment  
12 and bullying, said Vikki Leung, who  
13 created a petition over the weekend  
14 also calling for the creation of  
15 safety zones around hospitals.  
16 There's been emails telling my  
17 colleagues not to wear scrubs or  
18 anything that identifies them as  
19 healthcare workers, and I think  
20 that's truly upsetting and scary."

21 So if we could just scroll up so that we get page 5  
22 of 7 on the screen. (As read)

23 "Leung is on maternity leave  
24 but said she felt fear and  
25 frustration after hearing from her

1 colleagues about their experiences.

2 People are stressed out and

3 disheartened and really feeling

4 unappreciated, she told Metro

5 Morning on Monday."

6 You didn't sue Vikki Leung for the statements I

7 just quoted from this article, Ms. Choujounian?

8 A. No. It's my first time seeing  
9 this article.

10 108 Q. Okay. And Tab 23 is an email  
11 exchange between a CBC reporter, Colin Butler, and  
12 Canadian Nurses Association. And in short, on  
13 January 7, 2022, you'll see at 10:13 a.m., he  
14 writes: (as read)

15 "Eve Johnston of the Canadian  
16 Nurses Association and says he has a  
17 \$1-million statement of claim from  
18 three Ontario nurses who are suing  
19 the CNA and a media outlet in BC for  
20 slander and libel. There's no  
21 statement of defence attached to the  
22 file, and I wanted to give the CNA  
23 an opportunity to respond."

24 And the response back that he got is, we don't have  
25 it, in short, to make it short. So what my

1 question to you is, is, do you know who provided  
2 the Statement of Claim to CBC reporter Colin Butler  
3 before it was served on my clients, the Canadian  
4 Nurses Association, Tim Guest, and Mike Villeneuve?

5 A. No. I would have thought our  
6 lawyers did, but then I didn't understand why they  
7 hadn't received it, so I can't really answer that  
8 question.

9 109 Q. So you didn't provide Colin Butler  
10 your Statement of Claim -- well, sometime before  
11 January 7, 2022, and before it was served on my  
12 clients?

13 A. No.

14 110 Q. You didn't do that?

15 A. No.

16 111 Q. Can you let me know who did?

17 A. No.

18 112 Q. No. Like, I'm looking for an  
19 undertaking that you'll make inquiries to find out?

20 U/T A. Oh, okay. Yes, I will.

21 U/T MR. BOISSONNEAU-LEHNER: I don't know  
22 who did. What I can do is I can provide the email  
23 that our office from Mr. Butler -- or Mr. Butler as  
24 well asking for a comment, but I don't know how  
25 Mr. Butler got the claim. I assume he found it in

1 the court file.

2 MR. DEARDEN: Okay. Well, subject to  
3 documents I've requested, Ms. Choujounian, that  
4 completes my questions for you, and thanks for  
5 being here.

6 THE WITNESS: Thank you very much, sir.

7 MR. DEARDEN: So now Mr. Champ is going  
8 to have questions for you.

9 THE WITNESS: Okay.

10 SARAH CHOUJOUNIAN, PREVIOUSLY AFFIRMED,

11 QUESTIONED BY MR. CHAMP:

12 113 Q. Good morning, Ms. Choujounian. My  
13 name's Paul Champ. I'm one of the counsel for  
14 Together News and William Horter, a couple of the  
15 defendants in this action.

16 A. Good morning.

17 114 Q. Good morning. I just have some  
18 questions for you further to the affidavit that you  
19 filed in this matter.

20 A. Yes.

21 115 Q. I want to start, Ms. Choujounian,  
22 around -- just the Notice of Examination that we  
23 had sent to you, we had asked you to produce any  
24 documents around your invitation to attend the  
25 Global Frontline Nurses event in Washington, any

1 documents you might have around the organizing of  
2 that event and so forth. Do you have those  
3 documents together yet?

4 A. Unfortunately, I don't. A lot  
5 of -- it wasn't that many meetings, we were just  
6 starting off with Global Frontline Nurses then, but  
7 we're over Zoom, and we don't -- we hadn't record  
8 it.

9 I recall having certain messages going  
10 through on Signal or Telegram. I have since had to  
11 reload it and have a new phone, so I do not have  
12 any of those, unfortunately.

13 116 Q. Okay. You don't have any?  
14 There's no emails or anything like that?

15 A. No.

16 117 Q. All right. So for that trip to  
17 Washington, at the time, you were aware that there  
18 was a ban on nonessential travel in Canada,  
19 nonessential international travel?

20 A. Yes, but we felt like it was  
21 essential.

22 118 Q. And in terms of the organizing of  
23 the Global Frontline Nurses, who contacted you  
24 initially to attend this event in Washington?

25 A. Well, it wasn't supposed to be in



1 Washington. Actually, it was supposed to be in  
2 Florida.

3 119 Q. Right.

4 A. Erin Marie, who was a nurse who  
5 was also a whistleblower in the United States is  
6 who was organizing it, so Florida is her home  
7 state. But at some point, someone called  
8 Del Bigtree, who has the HighWire, invited us to  
9 speak in Washington and told us that we would have  
10 a bigger crowd there to hear us, so that's why we  
11 ended up being in Washington.

12 120 Q. Del Betree [sic]?

13 A. Del Bigtree. He's actually pretty  
14 known publicly.

15 121 Q. Okay.

16 A. Del Bigtree. 'D' --

17 122 Q. Oh, yes. I know who you're  
18 talking about now. Yes, okay, Del Bigtree. And  
19 did Del Bigtree give you any indication about what  
20 else was happening in Washington on that date?

21 A. No. And actually, he spoke to  
22 Erin Marie, so I wasn't really involved in all of  
23 that organization. I was just informed that we  
24 would be going there, and we agreed.

25 123 Q. So -- and Erin Marie, that's one

1 of the nurses in the United States; is that right?

2 A. Yes.

3 124 Q. And so one of the nurses in the  
4 U.S. was the intermediary, should I say, with Mr.  
5 Bigtree in terms of deciding on the location in  
6 Washington and I presume deciding on the date; is  
7 that right?

8 A. That's right.

9 125 Q. And so when you were informed that  
10 the event would be on January the 6th, did that  
11 date have any resonance with you?

12 A. I had no idea that that was  
13 anything political. We were invited to a Health  
14 and Freedom Summit, and that's where we were going  
15 to speak.

16 126 Q. Okay. And how long before the  
17 event were you invited?

18 A. Not very long. I can't give you  
19 exact date, but I would say not more than four to  
20 six weeks.

21 127 Q. Well, four to six weeks with a  
22 planning for some kind of event or summit in  
23 Florida, I guess, but when was it decided to move  
24 the event to Washington, roughly?

25 A. I'm thinking around the same time,

1 maybe -- maybe at four weeks, but I'm not -- I  
2 can't give you the exact dates. Maybe if we went  
3 back to look at the flights and stuff, when they  
4 were booked.

5 128 Q. Okay.

6 A. It wasn't too long before that.

7 129 Q. Now, the event itself, the Global  
8 Frontline Nurses event was called a Health and  
9 Freedom Summit; is that right?

10 A. Yes. Actually, the event wasn't  
11 planned by us. It was planned by a couple that is  
12 supposedly known in the Health and Freedom  
13 movement, which I'm not very aware of who they are,  
14 but their name was -- they are the Bollingers, and  
15 they're husband and wife. And so they arranged  
16 that event, and we were going to speak at their  
17 event.

18 130 Q. Okay. And when you say 'we', you  
19 meant -- do you mean you and Kristen Nagle? Or do  
20 you mean, like, all of the Global Frontline Nurses  
21 were going to speak at this event that they were  
22 organizing that's overall about Health and Freedom?

23 A. Yes, all of the Global Frontline  
24 Nurses which there was six of us.

25 131 Q. Right. And --

1                           A.    Plus one, actually, plus another  
2                           person that also spoke.

3    132                   Q.    So Mr. Bigtree invited you to  
4                           speak at his event essentially rather than the  
5                           other way around, Global Frontline Nurses  
6                           organizing it and asking him to speak; is that  
7                           right? It's Mr. Bigtree invited you --

8                           A.    Yeah. It wasn't -- but -- yes,  
9                           but it wasn't his event. He was also speaking at  
10                          that event.

11   133                   Q.    Okay. Was he part of the Global  
12                          Frontline Nurses' event? No. Okay.

13                          A.    No. He was one of Erin's  
14                          connections.

15   134                   Q.    So in your affidavit, paragraph 8,  
16                          you said that you had no foreknowledge that Trump  
17                          would make a speech to his supporters on January 6.  
18                          But you were aware that Trump supporters were  
19                          travelling to Washington, D.C. for protests on  
20                          January 6?

21                          A.    Not necessarily, no. I knew -- I  
22                          knew, actually, that Trump would be in the city  
23                          somewhere, but I had no idea that it was a  
24                          political day or anything like that.

25   135                   Q.    Right. So I mean, he's the

1 President of the United States, so it was a fair  
2 bet that he'd be in a Washington, D.C., but on your  
3 travel, any time in the days ahead of January 6, or  
4 even -- and when -- you travelled the day before, I  
5 gather, on the 5th?

6 A. I believe so, yes.

7 136 Q. One or two days before? Okay.

8 And so --

9 A. I think --

10 137 Q. And you weren't picking up on any  
11 media or anything like that, that there was some  
12 big event on January the 6th in Washington, D.C.?

13 A. Well, I was told that there was  
14 going to be a lot of people, and I thought it was  
15 for our Health and Freedom summit; so, yes, I was  
16 aware that there was going to be a lot of people.  
17 I just didn't realize that it was going to be so  
18 political.

19 138 Q. I guess you didn't do your  
20 research?

21 A. No. I was just interested in  
22 getting my message out to as many people as  
23 possible.

24 139 Q. Okay. And then so the Global  
25 Frontline Nurses' participation was there was the

1 six of you up on a stage, and then all of you gave  
2 short speeches; is that right?

3 A. Yes, and there was also another  
4 nurse who was a witness to something in the  
5 hospital, so I guess there was seven of us in  
6 total.

7 140 Q. Okay. And you spoke on that  
8 stage?

9 A. Yes.

10 141 Q. And Kristen Nagle spoke on that  
11 stage?

12 A. Yes.

13 142 Q. You were identified as nurses from  
14 Canada?

15 A. Yes.

16 143 Q. And do you recall what were some  
17 of the things you said? What was the nature of  
18 your message to the crowd?

19 A. Yes, I was saying because I worked  
20 in a nursing home, that I was saying how  
21 detrimental the lockdowns were to my residents  
22 compared to COVID, and also, I am very big on  
23 mental health, in the mental health field, and so I  
24 spoke about how the lockdowns were affecting  
25 people's mental health.

1       144                   Q.    Okay.  So -- and then Kristen also  
2                   spoke?

3                   A.    Yes.

4       145                   Q.    And roughly how big was the crowd  
5                   at that time?

6                   A.    Unfortunately, we spoke before the  
7                   event actually started, and there was about 50  
8                   people there, maybe between 50 and a hundred.  But  
9                   I really think it was, like, less, like, maybe 50,  
10                  so we didn't -- we -- the event started at 10, and  
11                  we got to speak at 9, unfortunately.

12      146                   Q.    Right.  9 a.m.?

13                  A.    Yes.

14      147                   Q.    Yes.  And so but you knew that  
15                  other people were going to be speaking on that  
16                  stage for the rest of the day?

17                  A.    Yes.

18      148                   Q.    Okay.  And what did you do after  
19                  the Global Frontline Nurses were finished with  
20                  their speeches?

21                  A.    So we stayed to -- we met a lot of  
22                  the other people that were there that were speaking  
23                  that are quite known in the Health and Freedom  
24                  movement.  We listened to their speeches, and so we  
25                  sticked [sic] around.  And later on, which I

1           didn't -- I didn't know was going to happen, there  
2           was a big screen, and Trump was talking. And I  
3           was, like, oh, Trump is having a speech. So we  
4           listened to his speech and stuck around for the --  
5           for the day for the rest of the speeches, and met  
6           people. There was food for us behind the stage to  
7           talk to some of the other guests.

8           149                   Q.    Right. And Trump, President Trump  
9           or Former President Trump, he, in some part, was  
10          supportive of the Health and Freedom movement;  
11          would you agree?

12                           A.    I think so, yes.

13          150                   Q.    And he also promoted or advocated  
14          for other kinds of alternative therapies like  
15          hydroxychloroquine and ivermectin. He supported  
16          those kinds of therapies, you're aware?

17                           A.    I -- I'm aware, but I don't know  
18          if I was aware at that point. I wasn't there for  
19          Trump. I am not a supporter of politicians, any  
20          type of politicians, so, yeah, I think he spoke  
21          about hydroxychloroquine later. I'm not sure.

22          151                   Q.    Okay. Did you --

23                           A.    But I like his -- his views more  
24          than the other people's views.

25          152                   Q.    And did you come to understand,



1 during that day when you were talking to some of  
2 the other people in the Health and Freedom event  
3 that they were -- they organized their event that  
4 day because they supported Trump?

5 A. I knew that some of them did, but  
6 that was irrelevant to me. I just wanted to make  
7 sure that I get my message across because I wanted  
8 the public to make an informed consent and be aware  
9 of what was really happening which is what I'm  
10 supposed to do as a nurse when the industry  
11 doesn't.

12 153 Q. Yes, I appreciate that you've said  
13 that you weren't -- you're apolitical or didn't  
14 really care about the president, but you did come  
15 to understand, in your conversations with other  
16 people that day, that the other attendees of the  
17 Health and Freedom summit were Trump supporters?

18 A. In some of their speeches, I  
19 realized that some were, but other people -- it  
20 wasn't really political in our Health and Freedom  
21 event where we were, so not necessarily -- not  
22 necessarily did I think it was -- I still didn't  
23 think it was political --

24 154 Q. Right.

25 A. -- at that point.

1       155                   Q.    And the woman who was doing the  
2                           organizing for Global Frontline Nurses you're  
3                           telling us about, Erin Marie Olszewski; is that  
4                           right?

5                           A.    Yes, I think so.   Yes.   Yes.

6       156                   Q.    Okay.   And you knew that she was a  
7                           big Trump supporter; is that right?

8                           A.    I found out when I met her, that,  
9                           yes, she -- she was a Trump supporter, yes.

10      157                   Q.    Right.   And she was the primary  
11                          organizer of the Global Frontline Nurses event; is  
12                          that fair?

13                          A.    Yes, her and Nicole, but mostly I  
14                          would say she was the head, yes.

15      158                   Q.    Okay.   All right.   So during that  
16                          day on January 6, you told us that afterwards, you  
17                          watched the other speakers on the stage, and then  
18                          at the end of their speech -- that event ended  
19                          around noon; is that right?

20                          A.    No.   There were still people  
21                          speaking up until -- and I think talking with --  
22                          including when there was a big screen with Trump on  
23                          it speaking.

24      159                   Q.    Right.

25                          A.    I think it was around 4ish when

1 people started to leave because I think people were  
2 starting to be at the Capitol. Something was  
3 starting to happen.

4 160 Q. Right. You made it to the  
5 Capitol, correct? You were at...

6 A. Yes, I did.

7 161 Q. Your stage -- or not your stage,  
8 but the stage where Global Frontline Nurses were  
9 speaking, that was relatively close to the Capitol  
10 building?

11 A. Yes. We had to go the -- to go to  
12 the washroom, we actually had to go to the Capitol.  
13 It was about one block away.

14 162 Q. Okay. And so it was about a block  
15 away. The -- after the Trump speech, a number of  
16 the people who were watching the speech marched  
17 towards the Capitol building; is that right?

18 A. Well, we weren't with those  
19 people. We were with the Health and Freedom  
20 Summit, but me and Erin heard about it and were  
21 kind of curious and went to see what was going on  
22 since we were so close.

23 163 Q. Right.

24 A. And the other nurses left.

25 164 Q. So none of the other nurses went

1 to the Capitol building?

2 A. No.

3 165 Q. Including Kristen?

4 A. They went to the hotel.

5 166 Q. Okay. Including --

6 A. Yeah, Kristen wasn't there.

7 167 Q. She went to the hotel. And so you  
8 went to the Capitol building to see what was going  
9 on, which you tell us in your affidavit. And what  
10 did you observe in that late afternoon?

11 A. I observed a lot of people  
12 outside. I didn't see any people going inside when  
13 I was there. It was peaceful. It was a lot of  
14 Trump supporters at that point, obviously. It was  
15 very obvious. And, yeah, people were peaceful.  
16 There was a lot of police on site, and, yeah, I  
17 think we must have stayed -- I can't tell you the  
18 exact time, but it felt like half an hour.

19 168 Q. You saw the Capitol police; what  
20 were the Capitol police doing?

21 A. They were just -- I don't know if  
22 they were the Capitol police, but they were police.

23 169 Q. Okay.

24 A. There was, I would say, hundreds  
25 of them just standing and waiting.

1       170                   Q.    Were they standing, like, in front  
2                           of the crowd that you were observing?

3                           A.    There was some at the doors, at  
4                           every door, but there was some -- they had just --  
5                           they were taking a big section, waiting -- I guess  
6                           waiting for someone to tell them to move into the  
7                           crowd. I -- they were just standing there --

8       171                   Q.    Right.

9                           A.    -- firmly, and yeah.

10      172                   Q.    And did you see any temporary  
11                           fencing around the Capitol Hill building to keep  
12                           the crowd back --

13                           A.    No.

14      173                   Q.    -- like, on the grounds?

15                           A.    No, not from where I was.

16      174                   Q.    Did you see any of the temporary  
17                           fencing on the ground that had been pushed to the  
18                           ground by the crowd? Did you see that?

19                           A.    No.

20      175                   Q.    Okay. You did see the Capitol  
21                           police at the doors of the Capitol building trying  
22                           to -- like, standing in front of people so they  
23                           couldn't enter; is that right?

24                           A.    Again, I don't know if they  
25                           were -- I don't know that they were Capitol police.

1           They just looked like police to me.

2       176                   Q.    Right.

3                   A.    But there was police officers at  
4       all the doors, yes, and there was a few people  
5       trying to get in.

6       177                   Q.    And you could see that?  You  
7       observed that?

8                   A.    Yes, but there was no violence.

9       178                   Q.    Okay.  And then you, yourself,  
10      were on the steps of the Capitol, correct?

11                  A.    There was some -- some steps.  We  
12      didn't really go too much on the steps.  It was  
13      crowded, and people were moving a lot, but yes.

14      179                   Q.    Okay.  And you were wearing a  
15      Trump flag at that point?

16                  A.    No.  I actually -- what happened  
17      with the Trump flag is that I wear all black, and a  
18      few people in the crowd started thinking I was  
19      Antifa, so I was given a Trump flag.  I think it  
20      was from Erin's bag to hold to show that I wasn't  
21      Antifa so that I stayed safe, but, like, it wasn't  
22      really my flag.

23      180                   Q.    Okay.  Okay.  That's fine.  I get  
24      that.  But when you got to the Capitol steps, you  
25      were wearing this Trump flag; is that right?

1                   A.    Well, not just when I got there.  
2                   I think when I -- we were walking amongst the  
3                   crown. Erin was talking to some people in the  
4                   crowd because she's kind of popular in that crowd,  
5                   I guess. And then someone said, hey, you look like  
6                   Antifa, and she was, like, here, take the Trump  
7                   flag, and -- and I took it. So we were already  
8                   there for a while, and I think it was just at the  
9                   end, maybe last 10, 15 minutes, yeah.

10    181           Q.    Okay. And Erin, she was wearing a  
11                   Trump hat throughout all of this, correct?

12                   A.    Correct.

13    182           Q.    So you were walking with her, and  
14                   she's wearing a Trump hat. You weren't protected  
15                   by walking with someone wearing a Trump hat?

16                   A.    No, because sometimes she was  
17                   talking to people, and someone else would -- would,  
18                   like, talk to me, or -- yeah, so we would get --  
19                   she could be, like, a few people ahead maybe, and  
20                   that's when people were, like -- some people don't  
21                   know her, right? So --

22    183           Q.    Right.

23                   A.    Yeah, they still -- I was all  
24                   wearing black, and they still mentioned Antifa, and  
25                   there was a lot of people there. We didn't want to

1 take a chance.

2 184 Q. Fair enough. You were interviewed  
3 by CNN that day, correct?

4 A. No. I wasn't interviewed by CNN,  
5 but I was caught seen on CNN --

6 185 Q. Oh, okay.

7 A. -- walking away from the grounds,  
8 and actually, we asked CNN if they wanted to  
9 interview us, but they didn't. So that's -- I  
10 guess that's why you see us kind of coming through  
11 the screen because we were asking them if they  
12 wanted to interview us, and -- and they didn't.

13 186 Q. And I understand when you were  
14 walking through the screen, you were wearing the  
15 Trump flag; is that right?

16 A. No. I had it crushed in my hand  
17 because I don't want to be seen as a political  
18 person, so I was kind of -- I'm hiding it. I had  
19 taken it off because we were kind of away from the  
20 crowd at that point, so I'm holding it in my hand.

21 187 Q. And you're walking with Erin,  
22 though, but -- and Erin was wearing a Trump hat,  
23 correct?

24 A. Yeah. Yes.

25 188 Q. Okay. And after that image or



1 scene was broadcast on CNN, some people in Canada  
2 saw that; is that right?

3 A. Yes, one of my friends saw that.

4 189 Q. And messaged you saying, like --  
5 messaged you about that; is that right?

6 A. Yeah, she was upset. She thought  
7 it meant that I was the Trumper suddenly because I  
8 was there. And I was upset because I thought she  
9 knew me better than that.

10 190 Q. Because you think it's something  
11 bad to be associated with Trump?

12 A. No. I just don't want to be  
13 seen -- I'm not very political. I don't really  
14 like politics. And I don't want people to think  
15 I'm a Trumper when I'm trying to reach everyone  
16 with a message equally, so I did not want to be  
17 seen as that, no.

18 191 Q. Right. And then that -- when did  
19 you return to Canada? The following day?

20 A. Yes.

21 192 Q. Okay. And that evening, you  
22 stayed in the hotel with Kristen and the other --  
23 some of the other nurses?

24 A. Yes.

25 193 Q. And you guys were hanging out in

1           someone's suite; is that right?

2                           A.    Yes, it was ours, our suite.

3   194                   Q.    Okay. And by that time in the  
4           evening, you guys were socializing and so forth  
5           about the success of the day; is that right?

6                           A.    Well, we were talking because we  
7           saw that I was on CNN, and, yeah, we were -- we  
8           were talking about what happened. It was kind of  
9           eventful. The whole city shut down, so, yeah, we  
10          were talking about what happened.

11   195                  Q.    Right. And by that time in the  
12          evening, you were aware that many people had  
13          attacked the Capitol building?

14                        A.    Yes, but I found it kind of weird  
15          because there was nothing like that when we were  
16          there, and we saw a lot of cops coming in from --  
17          like, I would say there was, like -- it was weird.  
18          There was school buses, maybe 30 school bus [sic]  
19          full of cops come in, and it seems like it started  
20          when we left. So I thought it was kind of awkward  
21          that that happened like that because it was so  
22          peaceful when we were there.

23   196                  Q.    But there was images on television  
24          that night of, like, people actually inside the  
25          Capitol building and inside the Congressional

1 Chamber. You saw those images?

2 A. I did. I did.

3 197 Q. Okay. And did you find that  
4 disturbing that people had attacked the Capitol  
5 building in that way?

6 A. Yes. I don't think that's right.

7 198 Q. And by that evening, you had  
8 heard -- had you heard that a woman had died that  
9 day?

10 A. I did.

11 199 Q. Was there anyone -- when you guys  
12 were in the hotel room that evening with some of  
13 the other nurses from Global Frontline Nurses, was  
14 anyone expressing any concern about having been,  
15 you know, in the vicinity of Capitol Hill during  
16 this day?

17 A. No. I didn't think it was a  
18 problem. There was so many people there, and I  
19 still felt like we weren't a part of that. We were  
20 separate. We are at a Health and Freedom --

21 200 Q. Okay.

22 A. -- Summit, so...

23 201 Q. Did you or are you aware -- well,  
24 did you put out any statements on social media  
25 expressing your disgust or horror or any other

1 sentiments about the attack on the Capitol  
2 building?

3 A. I don't think so. Honestly, I --  
4 I didn't realize that what happened afterwards was  
5 going to happen to us because I still thought we  
6 had done nothing wrong.

7 202 Q. I get that. I get that,  
8 Ms. Choujounian. I get that vibe from your  
9 affidavit. But just that evening, weren't you,  
10 just as a person, feeling upset in any way or  
11 disturbed by what had happened in Washington, D.C.  
12 that day?

13 A. Well, I was disturbed by the fact  
14 that I didn't see any of that, and I felt like the  
15 crowd wasn't like that, so I wasn't sure -- you  
16 know, I -- I know that the media sometime twists  
17 things around. I know there's pictures, but I'm  
18 not sure what happened there, honestly, if it was  
19 set up or -- I don't know. It just was weird to me  
20 because I didn't feel like that crowd was violent  
21 or going to do that at all, except for a few people  
22 that were kind of like at the door and...

23 203 Q. Right. But from the images that  
24 you saw later, you understood that it was a lot  
25 more than just a few people, correct?

1 A. Yes.

2 204 Q. All right. I'd like to show you a  
3 brief video. I'm going to pull it up here,  
4 Ms. Choujounian. We've got the video of you and  
5 Ms. Nagle and your friends in the hotel room from  
6 that evening where you're talking a bit about it.  
7 You're familiar with that video?

8 A. I think I have that picture.

9 205 Q. Okay. Just hold on a second.  
10 I'll get it here. Hold on two seconds. Just give  
11 me two seconds. I'm just going to put myself  
12 on mute here. Uh, oh. There we go. All right.  
13 So I've got it cued here, and I think I have the  
14 capacity to share the screen here I believe.

15 MR. CHAMP: Do I have that, Madam  
16 Reporter? I'm just going to share that if I can.

17 COURT REPORTER: I'm sorry. I was  
18 muted. Yes, you should, sir.

19 MR. CHAMP: Okay. Thank you. All  
20 right. Can everyone see that, that video?

21 THE WITNESS: Yes.

22 BY MR. CHAMP:

23 206 Q. So I'm just -- it's not very long.  
24 I think it's -- well, maybe I won't play the whole  
25 thing, but we'll go through it just to make sure

1 we're fair, but...

2 (VIDEO PLAYED)

3 MR. BOISSONNEAU-LEHNER: I'm sorry to  
4 interrupt. Mr. Champ, if you're meaning to play  
5 the audio, I don't think it's audible on our end.

6 MR. CHAMP: You're kidding me. Oh, no.

7 MR. BOISSONNEAU-LEHNER: Or maybe it's  
8 just me?

9 THE WITNESS: No.

10 BY MR. CHAMP:

11 207 Q. All right. I am going to --

12 A. It's just very low.

13 208 Q. It's very low?

14 A. Yes.

15 209 Q. But you can't hear? Okay. Let me  
16 see. I'll jack it up here. Okay.

17 (VIDEO PLAYED)

18 BY MR. CHAMP:

19 210 Q. Did you hear that? Is that still  
20 too low?

21 A. It's better.

22 MR. DEARDEN: Paul, we can't hear it.

23 MR. CHAMP: Can't hear it. Okay. I'm  
24 going to...

25 MR. DEARDEN: Is it your headsets that

1 sort of keeping it --

2 (DISCUSSION OFF THE RECORD)

3 (VIDEO PLAYED)

4 BY MR. CHAMP:

5 211 Q. Does everyone hear that okay?

6 Perfect.

7 MR. CHAMP: Thanks so much, then,  
8 Marco.

9 BY MR. CHAMP:

10 212 Q. And just where I've stopped the  
11 screen here, that's Erin who you had been walking  
12 with that day; is that right, Ms. Choujounian?

13 A. Yes.

14 213 Q. And it looks at that point she's  
15 wearing her Trump hat?

16 A. Yes.

17 214 Q. Okay.

18 (VIDEO PLAYED)

19 BY MR. CHAMP:

20 215 Q. So just right there,  
21 Ms. Choujounian, so you were right there. You're  
22 talking about how you just described it to us, and  
23 then you got the message from your friend, and you  
24 had told -- you texted to her, told her you were  
25 disappointed in her. Why were you disappointed in

1           your friend?

2                           A.     Because I thought she knew me  
3           better than to think I was political and going to  
4           be, like, all about Trump and -- and going to the  
5           Capitol the way she thought I did. And she did say  
6           in the text -- she kind of made it look like I was  
7           now racist, but I have biracial kids, and so it was  
8           just -- I was just disappointed in her. She's  
9           known me for a long time, and I couldn't believe  
10          that she just switched like that and thought that I  
11          was something that I wasn't.

12   216                   Q.     Okay.

13                           MR. CHAMP: Counsel, I'd like to  
14          introduce this video as an exhibit to the  
15          cross-examination of Ms. Choujounian.

16                           MR. BOISSONNEAU-LEHNER: No objection.

17                           MR. CHAMP: I'll stop the share. There  
18          we go.

19                           EXHIBIT 4: Video

20                           BY MR. CHAMP:

21   217                   Q.     In that video, Ms. Choujounian, it  
22          looks like you guys were all still kind of pumped  
23          about your day; is that fair to say?

24                           A.     Yes, it was surreal.

25   218                   Q.     Yes, big crowds are kind of like



1           that. They can be energizing, eh?

2                       A. I guess it was the whole thing  
3           that the city was shut down, and I guess I didn't  
4           mention that we left because all of the police  
5           officers that were there had taken a step forward,  
6           and we realized that we could be in danger, and  
7           that's not why we were there.

8                       We actually -- when we went, we were  
9           making sure that we were safe, right? So when we  
10          saw that the cops moved a little bit and that the  
11          crowd kind of got, like, scared and agitated,  
12          that's when we decided to leave, so I guess that's  
13          what I'm referring to when I'm saying it was kind  
14          of crazy.

15   219               Q. Okay. All right.  
16          Ms. Choujounian, thank you for that. And there was  
17          a number of news stories after that, after your  
18          return pointing out that there had been Canadian  
19          nurses at an event in Washington, D.C. as the --  
20          these Capitol building attacks, correct?

21                      A. Correct.

22   220               Q. Okay. And you have not brought  
23          legal action against any of those media  
24          organizations?

25                      A. No.

1       221                   Q.    Okay.  Now, I want to talk a bit  
2                   about your employment, Ms. Choujounian.  There's a  
3                   couple documents that were provided to us.  I want  
4                   to thank you and your counsel for that.

5                   One has to do with -- well, first, I'll  
6                   go to the S.R.T. Med-Staff.  So you're employed as  
7                   an RPN at S.R.T. Med-Staff; is that right?

8                   A.    Yes.

9       222                   Q.    Okay.  And you were terminated  
10                  shortly after your return from Washington?

11                  A.    Yes.

12       223                   Q.    And had you been on vacation from  
13                  your job or something like that when you went to  
14                  Washington?

15                  A.    I did, yeah, take the days off.  
16                  Actually, it's an agency, so it's very easy to say  
17                  I won't be available on this day and that day, and  
18                  they just book someone else to go.  It's like  
19                  in-the-community work.

20       224                   Q.    Okay.  So do you have a copy of  
21                  that termination letter with you by any chance?

22                  A.    Yes, I do have it.

23       225                   Q.    I'm just going to ask you some  
24                  questions about it, if that's okay?

25                  A.    Oh, I can't see it, but I read it

1           yesterday, so I -- and I kind of know it if that's  
2           okay.

3       226                   Q.    Well, I'll walk it through it, and  
4           if you have any concerns, I can find it, and I'll  
5           put it up on a share screen as well.

6                   A.    Okay.

7       227                   Q.    So it's a letter dated January  
8           14th, 2021. It's signed by Hannah Krieger  
9           (phonetic) who is the senior manager of client  
10          services; that sound right?

11                   A.    Yes.

12       228                   Q.    And the letter starts: (as read)  
13                    "This is to advise you that  
14                    your employment with S.R.T.  
15                    Med-Staff is terminated effective  
16                    immediately for cause."

17           Is that right?

18                   A.    Yes.

19       229                   Q.    And as part of the letter, they  
20           mention that you travelled to Washington to speak  
21           at one of the events for Global Frontline Nurses --  
22           they say Global Frontline Network, but they mean  
23           Global Frontline Nurses; is that right?

24                   A.    Correct.

25       230                   Q.    So how did they find out about

1           your trip to Washington? Did they tell you?

2                       A.    Yes, people were calling them and  
3           complaining about me working for them --

4    231               Q.    Right.

5                       A.    -- because they had seen it on the  
6           news.

7    232               Q.    They had seen it in the news,  
8           right. And it says in the last paragraph: (as  
9           read)

10                      "Given your comments in our  
11           call with you, we want to be clear  
12           that this decision is unrelated to  
13           whether or not you chose to attend a  
14           pro-Trump rally, and we accept that  
15           you were in the vicinity and went to  
16           the Capitol because of curiosity  
17           over the events taking place there.  
18           This decision is unrelated to the  
19           nature of that event."

20                      And that's -- you emphasized that to them in your  
21           call with them; is that right?

22                      A.    Yes, they had asked me if I had  
23           gone for that, and I told them what I told you,  
24           that we had gone to the Health and Freedom -- to  
25           speak at a Health and Freedom Summit.

1       233                   Q.    Right.  And then did they ask you  
2                           more details about what you were doing at the  
3                           Health and Freedom Summit?

4                           A.    They asked me if it was true that  
5                           I was speaking against the mandates --

6       234                   Q.    Right.

7                           A.    -- and the lockdowns which was  
8                           contrary to public health or something like that.

9       235                   Q.    Right.

10                          A.    Yeah.

11       236                   Q.    Yes.

12                          MR. CHAMP:  Counsel, I'd like to  
13                          introduce this as an exhibit to the cross-exam.

14                          MR. BOISSONNEAU-LEHNER:  Sure.  I also  
15                          think it's Exhibit D or one of -- that's fine.  
16                          Yes.

17                          MR. CHAMP:  Oh, I apologize.  I  
18                          apologize.  I knew there was one that did attach  
19                          her termination letter.

20                          MR. BOISSONNEAU-LEHNER:  Yes.

21                          MR. CHAMP:  No, I don't think she --  
22                          hold on a sec.  Yes, I don't think she -- oh, it  
23                          is.  Yes, I apologize.  You're right.  It was  
24                          attached.  All right.  Great.  Yes, so we don't  
25                          have to attach that as an exhibit.  That's great.

1 BY MR. CHAMP:

2 237 Q. In your interview or in that  
3 discussion with S.R.T., did they mention anything  
4 about the travel ban? Were they concerned about  
5 you making that trip notwithstanding the ban  
6 against nonessential travel?

7 A. Not that I remember, no.

8 238 Q. And you were previously terminated  
9 just a few months before that by another  
10 organization, correct?

11 A. Correct.

12 239 Q. Okay. You worked for an  
13 organization or for a senior living called Norfinch  
14 Care Community?

15 A. Yes, Sienna Norfinch Community.

16 240 Q. Yes, Sienna senior living was an  
17 elderly care facility of some kind?

18 A. A nursing home, yes.

19 241 Q. Yes. And you were working as an  
20 RPN there?

21 A. Yes. I was also chief steward of  
22 the union.

23 242 Q. Okay. And so there was a union  
24 there. S.R.T., where they unionised?

25 A. No.

1       243                   Q.    Okay.  And so I've got the  
2       disciplinary form indicating that you were  
3       terminated.  The date of that document is November  
4       the 3rd, 2020.  That's when you were terminated; is  
5       that right?

6                   A.    Yes.

7       244                   Q.    And the reasons for your  
8       termination -- and this was a just-cause  
9       termination, correct?  That was their allegation?  
10      Or not allegation.  They maintained that they had  
11      just cause to terminate your employment?

12                  A.    Yes.

13      245                   Q.    And they said it was because you  
14      had posted numerous statements contrary to our  
15      expectations and policy related to social media, so  
16      they were concerned about some of your social media  
17      posts?

18                  A.    Yes.

19      246                   Q.    They were concerned about some of  
20      your social media posts around, like, masking and  
21      stuff like that?

22                  A.    Yes, PCR tests, the testing, and,  
23      yeah, stuff like that -- that it was --

24      247                   Q.    So you were against testing?  I  
25      apologize.  I don't mean to interrupt you.

1                   A.    No.  I wasn't necessarily against.  
2                   I was bringing it to light that it wasn't a  
3                   diagnosis test, but I was also -- I think that I  
4                   also spoke about how it was affecting the  
5                   residents, and it made no sense, that no one was  
6                   sick, and the residents were locked in their rooms.

7    248               Q.    Right.  And did you grieve that  
8                   termination?

9                   A.    Yes, I did at first, but then I  
10                  decided that I didn't want to go back to work for  
11                  them because I didn't agree -- as someone who  
12                  didn't agree with what was going on, I didn't want  
13                  to be a part of harming -- you know, I got into  
14                  nursing to -- to do no harm, and so I didn't want  
15                  to work for them anymore.  And so we decided to try  
16                  to get severance, and I didn't accept that neither  
17                  because it was -- it was inappropriate, and I'd  
18                  like to re-open the case.

19   249               Q.    Okay.  I'll leave it at that.

20                  MR. CHAMP:  Counsel, we'll mark this  
21                  one as exhibit.  This one isn't attached to the  
22                  affidavit, if that's okay?

23                  MR. BOISSONNEAU-LEHNER:  Absolutely.

24                  MR. CHAMP:  And should we continue  
25                  numbering sequentially from Mr. Dearden's exam?  Is



1           that how we should manage it, I wonder?

2                       MR. DEARDEN: I think that makes sense.

3                       MR. CHAMP: Okay. So I've kind of lost  
4 track of the numbering, but I'm sure people --

5                       MR. DEARDEN: Four.

6                       MR. CHAMP: It's 4? Great. The video  
7 is 3, then?

8                       MR. DEARDEN: Oh, no. I forgot about  
9 the video.

10                      MR. CHAMP: The video is 3, and then  
11 this document would be exhibit 4.

12                      MR. DEARDEN: No. Video -- video  
13 should be 4.

14                      MR. CHAMP: Oh, sorry. Video is  
15 Exhibit 4, and this letter will be Exhibit 5.

16                      MR. DEARDEN: Yes.

17                      EXHIBIT 5: Letter dated January 14th,  
18 2021.

19                      BY MR. CHAMP:

20   250                Q. Now, have you worked as a nurse  
21 since your termination by S.R.T. Medical [sic]?

22                      A. No.

23   251                Q. So you didn't work as a nurse  
24 anywhere between January 2021 and September 2021?

25                      A. No.

1           252                   Q.    Okay.  Have you had any other  
2                               employment since that time?

3                               A.    No.

4           253                   Q.    And by since that time, I mean  
5                               since your termination by S.R.T. Medical.

6                               A.    No.

7           254                   Q.    I just had a few other questions  
8                               on one or two other matters, but Mr. Dearden  
9                               covered practically all of them.

10                              Just one or two questions on Canadian  
11                              Frontline Nurses.  You're on the Board.  Do you  
12                              have a formal title with Canadian Frontline Nurses?

13                              A.    We're still working on the titles.

14           255                   Q.    Okay.  And by Canadian Frontline  
15                              Nurses, they cover your expenses when you're  
16                              travelling to participate in activities and so  
17                              forth for Canadian Frontline Nurses?

18                              A.    Yes, for example, I'm on the East  
19                              Coast Tour now, so anything that has to do with  
20                              events and stuff like that is paid by Canadian  
21                              Frontline Nurses.

22           256                   Q.    Right.  And who manages the money?  
23                              Is one of you at least treasurer or something like  
24                              that?

25                              A.    I'm -- I would -- should be

1           probably called the treasurer. I do the  
2           accounting. Even though we do have accountants, I  
3           prepare it for them and stuff like that, so I keep  
4           track of all that stuff.

5       257                   Q.    Okay. Does anyone receive a  
6           salary from Canadian Frontline Nurses?

7                   A.    Yes, we do have one administrator  
8           now.

9       258                   Q.    So there's one single person who  
10          receives a salary or remuneration from the Canadian  
11          Frontline Nurses?

12                   A.    Yes.

13       259                   Q.    Do you -- or you or Kristen, you  
14          guys don't get on honorariums or anything like that  
15          for all your work for the organization?

16                   A.    No.

17       260                   Q.    All right. Just moving, then, to  
18          September -- the September 1st hospital protests,  
19          so it's true that Canadian Frontline Nurses  
20          publicly encouraged individuals from across the  
21          country to attend protests on September the 1st; is  
22          that right?

23                   A.    That's right.

24       261                   Q.    At protests outside hospitals,  
25          correct?

1 A. Correct.

2 262 Q. And you say in your affidavit at  
3 paragraph 17 that CFN organized protests and at a  
4 number of cities that are listed there. It's like  
5 18 cities. So CFN organized those protests?

6 A. Yes, I don't know if it's 18.

7 263 Q. Maybe I'm off on that. That was  
8 my count, but it's all the hospitals listed at  
9 paragraph 17 of your affidavit?

10 A. Yes.

11 264 Q. Yes, it's 18, 18 there, coast to  
12 coast to coast?

13 A. Oh.

14 265 Q. Yes. Now, I know that you  
15 attended in Montreal, and Kristen was in London.  
16 Did you know who the individual organizers were on  
17 the ground at every single one of those locations?

18 A. I actually know them, but Kristen  
19 arranged with them, so I wasn't the one to speak  
20 with them. I'm more of the social media for the  
21 organization. Kristen is more of the communicator  
22 and organizer of these things.

23 266 Q. So the Victoria, B.C. protest at  
24 Victoria Hospital, do you know the name of the  
25 organizer of that location?

1 A. I'm not sure who did it.

2 267 Q. Okay. Or the Vancouver one?

3 A. I'm thinking probably Danielle and  
4 Alyssia (phonetic). I don't know their last names.

5 268 Q. It's okay. Kamloops?

6 A. Probably Glen (phonetic). Again,  
7 I'm not the one who organized all of them, but I'm  
8 thinking it's Glen, a nurse, but I'm not sure  
9 again.

10 269 Q. How about the one in Calgary at  
11 the Foothills Medical Centre?

12 A. I'm not sure who did.

13 270 Q. Or Edmonton?

14 A. Again, I just --

15 271 Q. That's fine.

16 A. It's posted on -- from media.

17 272 Q. So are there any -- like, rather  
18 than me go through each and every one of them, can  
19 you think of any of them that you did know the  
20 person who organized it on the ground? Obviously  
21 London. Obviously Montreal. We've gone through  
22 the B.C. and Alberta ones, but any of the other  
23 ones in the Atlantic provinces or the other prairie  
24 provinces?

25 A. I'm thinking East Coast would have

1           been Cindy McDonald (phonetic) but, like, we have  
2           several nurses in Vancouver that could have  
3           organized that again and all across I'm -- I'm not  
4           sure. I can't answer it. Like I said, I'm not the  
5           one who does -- did all the planning and speaking  
6           to every single leader.

7       273                   Q.    Okay.

8           A.    I just take the flier and put it  
9           online and respond to people's questions from  
10          there.

11       274                   Q.    That's fair. And I think you  
12          answered a question like this for Mr. Dearden.  
13          Approximately how many members are there of  
14          Canadian Frontline Nurses? I think you said around  
15          40; is that right?

16          A.    Well, yes. We have many nurses,  
17          but we just started a directory. So when you say  
18          members, now members are now people on our  
19          directory.

20       275                   Q.    Oh, okay.

21          A.    I'm not sure what you mean. We  
22          have, like, hundreds of nurses across the country  
23          that back us up, but we only have now about 40  
24          nurses on our directory who are members of our  
25          website.

1 276 Q. Right. And but in --

2 A. We have about -- we have about --  
3 we have about 400 nurses subscribed to our news  
4 letter, if that answers your question a little  
5 better.

6 277 Q. Yes. No. That was helpful. But  
7 as of August and September 2021, you didn't have a  
8 directory yet; is that right?

9 A. No. Right.

10 278 Q. And who is managing that directory  
11 for you now?

12 A. Our administrator does all the  
13 behind-the-scene work, but we -- I'm on an  
14 East-Coaster tour right now talking about it and  
15 promoting it so that people become aware of it.

16 279 Q. Right. Now, so I presume, like,  
17 the CFN felt like it was good to have as many  
18 protests as possible on September the 1st? That  
19 was part of the plan?

20 A. Yes, we wanted to bring national  
21 awareness to what was happening with nurses across  
22 the country.

23 280 Q. And you obviously wanted as large  
24 as crowds as possible to draw attention to that  
25 cause?

1 A. Absolutely.

2 281 Q. And when CFN was organizing these  
3 protests, did you give any consideration to whether  
4 the crowds might become so large it would be  
5 difficult for patients to access those hospitals?

6 A. No, because for one, I'm part of a  
7 union, and we know that unions protest at hospitals  
8 all the time, and, two, we had police on site for,  
9 as far as I know, every location making sure that  
10 that does not happen and that we weren't blocking  
11 people from going in and out and that we weren't  
12 interfering because that's definitely not what we  
13 wanted to do.

14 We want to help people. We do not want  
15 to harm them, right? So we had police on site, and  
16 like I said, there's -- it's not a new thing to  
17 have protests at hospitals. The union have them.  
18 I was part of the union, so I didn't think that it  
19 was going to be that big of a problem.

20 282 Q. Right. But unions, typically,  
21 they have, like, a picket line, an organized single  
22 picket line and so forth, and they're organized  
23 about who can cross the picket line or not or what  
24 not. And all the union people who attend will know  
25 what that protocol is.



1 I'm just wondering did Canadian  
2 Frontline Nurses communicate out a protocol to all  
3 those people that they wanted to attend at their  
4 protest --

5 A. We --

6 283 Q. -- about what they expected?

7 A. We had police there to make sure  
8 that the entrances weren't blocked and that people  
9 were in the right places.

10 284 Q. Okay. And so notwithstanding --  
11 well, first of all, you weren't at all the  
12 locations across Canada, correct?

13 A. Correct.

14 285 Q. You really only knew what happened  
15 in Montreal?

16 A. I was only in Montreal, yes.

17 286 Q. And could you see everything that  
18 was happening in Montreal at the Montreal location?

19 A. Yes, it wasn't a big crowd, so it  
20 was easy to see.

21 287 Q. Do you have a sense of how many  
22 people were at the Montreal one?

23 A. Maybe between a hundred and a  
24 hundred and fifty approximately.

25 288 Q. And you would agree with me,

1 Ms. Choujounian, that there was a large number of  
2 media reports about these protests saying that the  
3 protestors were screaming and hurling insults at  
4 people and so forth? You're aware of those news  
5 stories?

6 A. We did. We were, yes. We -- we  
7 did see several of those stories, yes.

8 289 Q. And in your view, those stories  
9 are just false; is that right?

10 A. Yes.

11 290 Q. Okay.

12 MR. CHAMP: I'm just going to be a  
13 moment, if I may, and I believe I'm done. Just  
14 hold on.

15 BY MR. CHAMP:

16 291 Q. Ms. Choujounian, I just have a  
17 couple more questions and I'm done. When you  
18 travel to Washington, either you travel there on  
19 your way back, were you questioned by border guards  
20 about what the purpose of your travel was?

21 A. Yes, we told them that we spoke at  
22 a summit.

23 292 Q. Did they ask you anything about  
24 whether that travel was essential or why it was  
25 essential?

1 A. We told them it was business, I  
2 believe.

3 293 Q. And it was widely reported at the  
4 time that you were fired for essentially violating  
5 that travel ban. Did you ever contact any of those  
6 newspapers and ask them to correct that?

7 A. No. We didn't have any lawyers at  
8 that point.

9 294 Q. Okay.

10 MR. CHAMP: Thank you, Ms. Choujounian.

11 Those are my questions. Thank you very much.

12 THE WITNESS: Thank you.

13 MR. BOISSONNEAU-LEHNER: No

14 re-examination.

15 MR. DEARDEN: So Sarah's free to go.

16 MR. BOISSONNEAU-LEHNER: Thank you,  
17 Sarah.

18 THE WITNESS: Thank you very much.

19 Have a great day. -- Whereupon the Examination  
20 concluded at 11:56 a.m.

21

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25

REPORTER'S CERTIFICATE

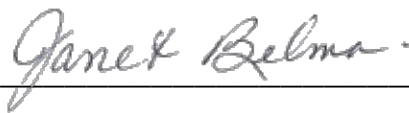
I, JANET BELMA, CSR, Certified  
Shorthand Reporter, certify;

That the foregoing proceedings were  
taken before me at the time and place therein set  
forth, at which time the witness was put under  
oath;

That the testimony of the witness  
and all objections made at the time of the  
examination were recorded stenographically by me  
and were thereafter transcribed;

That the foregoing is a true and  
correct transcript of my shorthand notes so taken.

Dated this 27th day of July, 2022.



NEESONS COURT REPORTING INC.

PER: JANET BELMA, CSR, B.Ed.

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Court File No.: CV-21-00673636-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

**B E T W E E N :**

CANADIAN FRONTLINE NURSES,  
SARAH CHOUJOUNIAN, KRISTEN NAGLE,  
and KRISTAL PITTER

Plaintiffs

– and –

CANADIAN NURSES ASSOCIATION,  
TIM GUEST, MICHAEL VILLENEUVE, TOGETHER NEWS INC.  
o/a COMOXVALLEY NEWS and o/a VANISLE NEWS,  
and JOHN DOE

Defendants

---

**NOTICE OF EXAMINATION**

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TO: **SARAH CHOUJOUNIAN**

YOU ARE REQUIRED TO ATTEND on **Friday, July 22, 2022**, at 10 a.m. via  
videoconference, hosted at the offices of Neesons Reporting, 77 King Street West, Suite  
2020, Toronto, ON, M5K 1A1, Tel: 416-413-7755, for:

☒ Cross-examination on your affidavit sworn July 14, 2022

☐ Examination for discovery

☐ Examination for discovery on behalf of or in place of [identify party]

[ ] Examination in aid of execution

[ ] Examination in aid of execution on behalf of or in place of [identify party]

If you object to the method of attendance, you must notify the other parties or their lawyers. If you and the other parties cannot come to an agreement on the method of attendance, one of the parties must request a case conference for the court to make an order under Rule 1.08(8).

YOU ARE REQUIRED TO BRING WITH YOU and produce at the examination the following documents and things,

All original documents including any correspondence, e-mails, text messages, Instagram messages, Facebook messages, WhatsApp group chat messages, Telegram messages, Tweets or other social media communications, and copies of the same in your possession or under your control or power:

1. relating to the termination of your employment with the Norfinch Care Community;
2. relating to any College of Nurses of Ontario investigations and proceedings involving you, including any complaint about you and the confidential disclosure package referenced in paragraphs 37 and 38 of your affidavit sworn on July 14, 2022;

3. relating to any charges against you under the *Emergency Management and Civil Protection Act*, the *Reopening Ontario (A Flexible Response to COVID-19) Act* or any other Act;
4. relating to the organization, planning, notices of (e.g. digital flyers), and attendance at the rallies organized by you and/or Canadian Frontline Nurses on or before September 9, 2021.

Date: July 19, 2022

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Horter)

Electronically filed / Déposé par voie électronique : 11-Aug-2022  
 Toronto Superior Court of Justice / Cour supérieure de justice  
**CANADIAN FRONTLINE NURSES et al.**  
**Plaintiffs**

349

-and-

**Court File No./N° du dossier du greffe : CV-21-00673636-0000**

**CANADIAN NURSES ASSOCIATION et al.**  
**Defendants**

**Court File No. CV-21-00673636-0000**

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
 PROCEEDING COMMENCED AT  
 TORONTO

**NOTICE OF EXAMINATION**

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Lawyers for the defendants, Canadian Nurses Association,  
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**File Number: T1028668**

## Romeo, Marco

---

**From:** Alexander Boissonneau-Lehner <alehner@johnstonecowling.com>  
**Sent:** Thursday, July 21, 2022 7:58 PM  
**To:** Dearden, Richard  
**Cc:** Paul Champ; Aditi Gupta; Romeo, Marco; Psellas, Alexandra; Christine Johnson  
**Subject:** Re: Canadian Frontline Nurses et al. v. Canadian Nurses Association et al. - Cross Examinations

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### CNA Notice of Examination production request

1. Documents relating to termination of employment – **Will produce** (hopefully within the next hour or so)
2. relating to *any* College of Nurses of Ontario investigations and proceeding involving practice and conduct of plaintiffs – **We object.** Relevance. Also object on the basis of the confidentiality asserted by the CNO on these documents, which is not ours to waive.
  - a. On producing portions of complaints to the CNO which reference the CNA publication of September 9, 2021. **Under advisement.** (I want to clear this with the CNO – I might be able to get their consent to disclose the documents with personal information third parties redacted.)
3. Relating to any charges against you under the Emergency Management and Civil Protection Act, the Reopening Ontario (A Flexible Response to COVID-19) Act or any other Act. – **We object.** Relevance.
4. Relating to the organization, planning, notices of (e.g. digital flyers) and attendance at the rallies organized by the Plaintiffs on or before September 9, 2021 – **We object.** Relevance and proportionality.
  - a. However we do not object to producing these documents as it relates to the September 1, 2021 protest. I am not optimistic that I will be in a position to provide these documents ahead of their cross-examinations tomorrow.
5. (In relation to Nagle) Registered Nurses Association of Ontario's communications involving her conduct and practices – **We object.** Relevance.

### Together News Notice of Examination production request

1. Termination letters – **will produce.** (hopefully within the next hour or so)
2. Choujounian/Nagle: All documents, including emails, texts or communications on other social media platforms relating to their participation in the Global Frontline Nurses event on January 6, 2021, including their invitation, the organizing of the event, and the agenda. – **Will produce**, though my understanding is that some of the documents that were once in Choujounian & Nagle's possession may no longer be available. I will assemble what I have so far and endeavour to send it out as soon as I can.

Alexander Boissonneau-Lehner  
Lawyer



**Toronto Office:** 441 Jarvis Street, Toronto, Ontario M4Y 2G8  
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[www.johnstonecowling.com](http://www.johnstonecowling.com)

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---

**From:** "Dearden, Richard" <Richard.Dearden@gowlingwlg.com>

**Date:** Thursday, July 21, 2022 at 7:02 PM

**To:** Alexander Boissonneau-Lehner <alehner@johnstonecowling.com>

**Cc:** Paul Champ <pchamp@champlaw.ca>, Aditi Gupta <agupta@johnstonecowling.com>, "Romeo, Marco" <Marco.Romeo@gowlingwlg.com>, "Psellas, Alexandra" <Alexandra.Psellas@gowlingwlg.com>, Christine Johnson <cjohnson@champlaw.ca>

**Subject:** Re: Canadian Frontline Nurses et al. v. Canadian Nurses Association et al. - Cross Examinations

Hi Alex - what documents are you objecting to producing?

Sent from my iPhone

On Jul 21, 2022, at 6:54 PM, Alexander Boissonneau-Lehner <alehner@johnstonecowling.com> wrote:

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---

Hi Paul,

Choujonian, Nagle, Pitter I believe.

The documents that I'm not objection to. I'm working on them. I will try to get them out this evening, but no promises.

Kind regards,  
Alex

Alexander Boissonneau-Lehner

Lawyer

<image001.png>

**Toronto Office:** 441 Jarvis Street, Toronto, Ontario M4Y 2G8

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Tel: 416-546-2125

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---

**From:** Paul Champ <pchamp@champlaw.ca>

**Date:** Thursday, July 21, 2022 at 5:41 PM

**To:** Alexander Boissonneau-Lehner <alehner@johnstonecowling.com>, "Dearden, Richard" <Richard.Dearden@gowlingwlg.com>

**Cc:** Aditi Gupta <agupta@johnstonecowling.com>, "Romeo, Marco" <Marco.Romeo@gowlingwlg.com>, "Psellas, Alexandra" <Alexandra.Psellas@gowlingwlg.com>, Christine Johnson <cjohnson@champlaw.ca>

**Subject:** Canadian Frontline Nurses et al. v. Canadian Nurses Association et al. - Cross Examinations

Good evening Alex,

Can you please confirm again the order of the witnesses tomorrow? And would you be in a position to send the documents your affiants will be producing later this evening?

I can advise that we will be providing this evening written answers to the questions identified today during the cross of William Horter as well as the videos and documents requested.

Paul Champ

**CHAMP & ASSOCIATES | CHAMP & AVOCATS**

43 Florence Street | 43, rue Florence

Ottawa, Ontario K2P 0W6

T: (613) 237-2441

F | Téléc.: (613) 232-2680

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# Find a Nurse



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## SARAH A CHOUJOUNIAN-ABULU

### ENTITLED TO PRACTICE WITH NO RESTRICTIONS

**ESSENTIAL INFO:** [Please read](#)

General Registration History Practice Information Employment Information

#### Registered Practical Nurse (RPN)

Category	RPN
Class	General
Registration Number	JD83453
Registration Status	Current
Initial Registration with CNO	21-Jun-2004

College of Nurses of Ontario  
101 Davenport Road Toronto, ON Canada M5R 3P1



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## SARAH A CHOUJOUNIAN-ABULU

### ENTITLED TO PRACTICE WITH NO RESTRICTIONS

**ESSENTIAL INFO:** [Please read](#)

General

Registration History

Practice Information

Employment Information

Registration history since 04 Jun, 2009

#### Registered Practical Nurse (RPN)

Category	Class	Status	From	To	Source
RPN	General	Current	13-Feb-2006		

College of Nurses of Ontario  
101 Davenport Road Toronto, ON Canada M5R 3P1



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## SARAH A CHOUJOUNIAN-ABULU

### ENTITLED TO PRACTICE WITH NO RESTRICTIONS

**ESSENTIAL INFO:** [Please read](#)

[General](#) [Registration History](#) [Practice Information](#) [Employment Information](#)

#### CNO Hearings Pending [What's this?](#)

<b>SOURCE:</b>	Discipline Committee
<b>REFERRAL DATE:</b>	06-Oct-2021
<b>HEARING DATES:</b>	November 7-10 and November 14-16, 2022
<b>DETAILS:</b>	<p>It is alleged that the member committed professional misconduct between October 2020 and February 2021 in that she:</p> <ul style="list-style-type: none"><li>contravened the standards of practice of the profession and engaged in disgraceful, dishonourable or unprofessional conduct when she publicly made or shared statements, or caused others to make such statements on her behalf, which contained information which she knew or ought to have known was inaccurate, false and/or misleading in relation to the COVID-19 pandemic and/or the public health response to the COVID-19 pandemic, and/or which encouraged non-compliance of public health orders in relation to the COVID-19 pandemic.</li></ul>
<b>NOTICE OF HEARING:</b>	<a href="#">Read the Full Notice Of Hearing</a>
<b>STATUS:</b>	The hearing dates of June 13-15, 2022 and June 20-23, 2022 are cancelled.

# Find a Nurse



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## SARAH A CHOUJOUNIAN-ABULU

### ENTITLED TO PRACTICE WITH NO RESTRICTIONS

**ESSENTIAL INFO:** [Please read](#)

General

Registration History

Practice Information

Employment Information

The content is based on information the nurse or nurse's employer reports to CNO. The employment contact information may be nursing or non-nursing.

#### RPN EMPLOYMENT

##### SRT Medstaff

2 BLOOR ST W, 28TH FLOOR  
TORONTO, ON  
M4W 3E2  
CANADA  
+1 (416) 968-0833

##### Start Date

2004

##### End Date

2021

##### Norfinch Care Community

22 NORFINCH DR  
NORTH YORK, ON  
M3N 1X1  
CANADA  
+1 (416) 623-1120

##### Start Date

2007

##### End Date

2020

# EXHIBIT 4

(Video posted to Nagle  
Instagram on January 6,  
2021)



## DISCIPLINARY FORM

TEAM MEMBER INFORMATION		
Team Member:	Sarah Choujounian-Abulu	Union Rep/ERC (As applicable): Ilian Burbano
Location:	Norfinch Care Community	Issuing Manager: Sadie Friesner
Team member opted out of having union representation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No TM Initial: _____		Date: November 3, 2020
TYPE OF DISCIPLINE		
<input type="checkbox"/> Verbal Warning	<input type="checkbox"/> Written Warning	<input type="checkbox"/> 1 Day Suspension
<input type="checkbox"/> 3 Day Suspension	<input type="checkbox"/> 5 Day Suspension	<input checked="" type="checkbox"/> Termination
TYPE OF OFFENCE		
<input type="checkbox"/> Lateness/No Scan/Swipe	<input type="checkbox"/> Unfit for Work	<input type="checkbox"/> Improper Lift Transfer
<input type="checkbox"/> No Call No Show	<input type="checkbox"/> Time Theft	<input type="checkbox"/> Medication Errors
<input type="checkbox"/> Patterned Absences	<input type="checkbox"/> Theft	<input type="checkbox"/> Resident Neglect
<input type="checkbox"/> Leaving Early /Unauthorized	<input type="checkbox"/> Falsification of Documents	<input type="checkbox"/> Resident Abuse
<input type="checkbox"/> Absence Misrepresentation	<input checked="" type="checkbox"/> Social Media	<input type="checkbox"/> Violence, Harassment and/or Discrimination
<input type="checkbox"/> Failure to Report Absence	<input type="checkbox"/> Sleeping on the Job	<input type="checkbox"/> Other

**STATE THE PARTICULARS:** Outline below the details of the incident.

You had violated the Employee Code of Conduct and the Social Media Policy by posting numerous statements contrary to our expectations and policies.

As a result, the decision has been made to end your employment for termination with cause.

Please note as a result of this termination you are not permitted to visit Norfinch Care Community.

**Note:** If the offence is related to attendance management, attach a summary of the team member's attendance record, which should include: date of incident duration of absence, severity of absence and reason given for the absence.

You are in serious violation of the Company's policies and procedures, which include but are not limited to:

POLICIES, PROCEDURES AND/OR LEGISLATION VIOLATED		
<input checked="" type="checkbox"/> Employee Code of Conduct	<input type="checkbox"/> Professional Standards	<input type="checkbox"/> Prevention of Abuse Neglect of a Resident
<input type="checkbox"/> Occupational Health & Safety Act	<input type="checkbox"/> Attendance Management	<input type="checkbox"/> Workplace Violence, Harassment & Bullying
<input type="checkbox"/> Resident Bill of Rights		<input checked="" type="checkbox"/> Other Social Media Policy

**STATE EXPECTATIONS:** Outline below what the expectations are going forward:

--

Any further performance issues may lead to further progressive discipline, up to and including termination of employment for just cause.

## ACKNOWLEDGMENT OF RECEIPT OF WARNING

☐ By checking this box you confirm that you understand the information in this warning. You also confirm that you and your Department Manager/Designate have discussed the warning and a plan for improvement. Signing this form does not necessarily indicate that you agree with this warning.

Issuing Manager's Signature: \_\_\_\_\_

Team Member's Signature: \_\_\_\_\_

cc: Team Member File, Team Member, Union/ERC Representative

III-E-10.40(b)

December 2019

MEETING HELD VIA ZOOM  
CONFERENCE AT 3:00PM November 3RD, 2020

**TAB 5**

# **Canadian Frontline Nurses et al. v. Canadian Nurses Association et al.**

KRISTEN NAGLE  
on Friday, July 22, 2022



77 King Street West, Suite 2020  
Toronto, Ontario M5K 1A1

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Court File No. CV-21-00673636-0000

ONTARIO

SUPERIOR COURT OF JUSTICE

B E T W E E N:

CANADIAN FRONTLINE NURSES,

SARAH CHOUJOUNIAN, KRISTEN NAGLE,

and KRISTAL PITTER

Plaintiffs

- and -

Canadian Nurses Association,

TIM GUEST, MICHAEL VILLENEUVE, TOGETHER NEWS INC.

o/a COMOXVALLEY NEWS and o/a VANISLE NEWS,

and JOHN DOE

Defendants

-----  
--- This is the Cross-Examination On Affidavit

Sworn on July 14, 2022, of KRISTEN NAGLE, taken via  
Neesons, a Veritext Company's virtual platform, on  
the 22nd day of July, 2022.

A P P E A R A N C E S:

(All via virtual platform)

A. Boissoneau-Lehner, Esq., for the Plaintiffs  
R. Dearden, Esq., for Canadian Nurses  
Association, Tim  
Guest, and Michael  
Villeneuve  
M. Romeo, Esq., for Canadian Nurses  
Association,  
Tim Guest, and Michael  
Villeneuve  
P. Champ, Esq., for Together News Inc.  
and William Horter  
C. Johnson, Esq., for Together News Inc.  
and William Horter

REPORTED BY: Janet Belma, CSR, B.Ed.

## I N D E X

WITNESS: KRISTEN NAGLE

Examination by Mr. Dearden.....5

Examination by Mr. Champ.....65

\*\*The following list of undertakings, advisements  
and refusals is meant as a guide only for the  
assistance of counsel and no other purpose\*\*

## INDEX OF UNDERTAKINGS

The questions/requests undertaken are noted by U/T  
and appear on the following pages: 57:6, 59:15,  
60:10

## INDEX OF ADVISEMENTS

The questions/requests taken under advisement are  
noted by U/A and appear on the following pages:  
15:12, 19:12, 20:10, 24:6

## INDEX OF REFUSALS

The questions/requests refused are noted by R/F and  
appear on the following pages: 17:24, 18:6, 21:15,  
22:20, 29:10, 30:7, 30:19, 31:5, 31:13, 32:5, 33:4,  
35:8, 44:2, 44:24, 46:11, 47:19, 48:22, 50:11,

1 51:14, 52:16, 53:6, 104:15

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## INDEX OF EXHIBITS

NUMBER/DESCRIPTION		PAGE/LINE NO.
NO.	DESCRIPTION	PAGE
6	Notice of Examination to Attend for Kristen Nagle	7
7	Find a Nurse pages for Kristen Nagle	35
8	Notice of Application Divisional Court for judicial review of Kristen Nagle	64
9	Package of Documents from Freedom Rally.2021.com website	78
10	London Health Sciences Service Centre January 15th, 2021, for Ms. Nagle	90

1 Sworn: Kristen Nagle.

2 COURT REPORTER: And just before we  
3 begin, ma'am, could you please state and spell your  
4 name for the record.

5 THE WITNESS: Kristen Nagle,  
6 K-R-I-S-T-E-N, N-A-G-L-E.

7 COURT REPORTER: Thank you.

8 And I'm ready to begin, counsel.

9 MR. DEARDEN: Thank you.

10 (DISCUSSION OFF THE RECORD)

11 BY MR. DEARDEN:

12 1 Q. So, Ms. Nagle, I'm Rick Dearden.  
13 I represent the Canadian Nurses Association,  
14 Tim Guest, and Michael Villeneuve; and Mr. Champ  
15 represents Together News and Mr. Horter. I'll be  
16 asking you some questions, and as you saw with  
17 Sarah's cross-examination, then Paul will have  
18 questions of his own after I'm finished. So you  
19 swore a 43-paragraph affidavit on July 14, 2022,  
20 that attaches Exhibits A to F?

21 A. Yes, I did.

22 2 Q. And do you want to retract or  
23 correct anything that's in your affidavit?

24 A. I -- I'm wondering if the one you  
25 have says in -- in line Number 1 that I live in the

1 city of London in the Regional Municipality of  
2 Peel?

3 3 Q. That's what I have.

4 A. That is an error, so I do not  
5 reside in the Municipality of Peel, so just London.

6 4 Q. Okay. Anything else?

7 A. And -- yes, I'd also like to add  
8 Kelowna into the list of -- of cities. It was not  
9 added to the poster, but we did have contacts  
10 there.

11 5 Q. What paragraph are you referring  
12 to in your affidavit?

13 A. I'm sorry. One moment. Fifteen.

14 6 Q. And you would add Kelowna, like,  
15 after Vancouver; is that where you want it?

16 A. Yes, any -- anywhere between A, B,  
17 or C.

18 7 Q. Right. Anything else?

19 A. I don't believe so, no.

20 8 Q. Okay. So at the documents brief  
21 Tab 3, there's a Notice of Examination for you to  
22 attend today, and it requests documents on pages 2  
23 and 3 of that Notice of Examination. Do you see  
24 that?

25 A. Yes.

9 Q. So firstly, I'd like to enter that  
as Exhibit Number 6 in these cross-examinations.

COURT REPORTER: All right.

EXHIBIT 6: Notice of Examination to  
Attend for Kristen Nagle

MR. DEARDEN: And we will -- I take it,  
counsel, the objection discussion that we had with  
Sarah Choujounian's cross-examination will apply to  
Ms. Nagle and Ms. Pitter's cross-examinations, and  
we need not repeat that?

MR. BOISSONNEAU-LEHNER: Correct. But,  
though, in fairness to you, I believe you made an  
additional request of Ms. Nagle that you did not  
make of the other, and I think that's Number 4  
relating to the Registered Nurses Association of  
Ontario's communications.

However, in my email, that's attached  
as an exhibit. I believe I indicated that we  
object to producing those on the basis of  
relevance.

MR. DEARDEN: Right. And we'll agree  
to disagree on the objections and deal with them  
another day.

MR. BOISSONNEAU-LEHNER: Yes.

MR. DEARDEN: Okay.



1 BY MR. DEARDEN:

2 10 Q. I have some questions on College  
3 of Nurses of Ontario, Ms. Nagle. That is the  
4 governing body for nurses in Ontario, correct?

5 A. Correct.

6 11 Q. And The College enforces nursing  
7 standards of practice and conduct, correct?

8 A. Yes.

9 12 Q. And at Tab 7, you'll see a code of  
10 conduct of The College of Nurses of Ontario, and if  
11 you flip to their page 2 in the bottom right-hand  
12 corner, you'll see a great big number 2. And about  
13 three-quarters of the way down, you'll see:  
14 Mission, Regulating Nursing in the Public Interest.  
15 Do you see that?

16 A. I think I'm confused on the page.

17 MR. BOISSONNEAU-LEHNER: Two --

18 BY MR. DEARDEN:

19 13 Q. So -- well, bottom --

20 A. I think -- then there's the Table  
21 of Contents, and then I move down.

22 14 Q. So that's it. On the Table of  
23 Contents --

24 A. Oh, I do have it. Sorry. Yes.

25 15 Q. -- they've labeled it page 2 --

1           you'll see Mission, and The College's mission is  
2           regulating nursing in the public interest. Do you  
3           agree with that?

4                   A.    May I say, like, I agree that  
5           it -- it says that.

6       16               Q.   And do you agree that that's The  
7           College's mission? You're a member of The College,  
8           so do you agree that's...

9                   A.    I agree that that is what they  
10          have posted. I do not agree that is what they are  
11          doing.

12       17               Q.   I'm asking you if you agree that  
13          that is The College's mission as opposed to what  
14          you think they're doing or not doing.

15                   A.    I -- I see that that is their  
16          mission, so, yes.

17       18               Q.   Okay. And if you flip to the next  
18          page, which is the third page, it says: (as read)

19                               "Our focus at The College of  
20                               Nurses of Ontario is to protect the  
21                               public. One way we do this is by  
22                               setting and enforcing standards of  
23                               practice for all nurses in Ontario."  
24          Do you agree that one way that The College protects  
25          the public is by setting and enforcing standards of

1 practice for nurses?

2 A. I believe that is what they set  
3 out to do.

4 19 Q. Okay. And do you agree, if you  
5 look at the fourth paragraph on that page, it says:  
6 (as read)

7 "The code puts patients at the  
8 centre of nursing care. We know it  
9 is important that the public has  
10 confidence in the care nurses  
11 provide. Public safety is our top  
12 priority. This code supports nurses  
13 to provide patients with care they  
14 expect and deserve."

15 Do you agree that it is important that the public  
16 has confidence in the care nurses provide?

17 A. I absolutely agree that it's  
18 important the public has confidence. I do not  
19 believe that the CNO is providing that.

20 20 Q. Do you agree that as a nurse  
21 governed and regulated by The College of Nurses  
22 that you must abide by The College's code of  
23 conduct?

24 A. I agree that when our public, our  
25 patients are put at risk, that it is our duty as a

1 nurse to be advocates and agitators to stand up for  
2 our patients against all costs, and that is in our  
3 Fundamentals of our Nursing textbook that we  
4 learned in school.

5 21 Q. What I'm speaking to you about is  
6 not your textbook from nursing school. You have a  
7 document at Tab 7 of the documents brief which is a  
8 practice standard code of conduct of The College of  
9 Nurses of Ontario which governs your conduct and  
10 your practice.

11 And my simple question is, do you agree  
12 that as a nurse that's regulated by The College,  
13 you must abide by this code that you see at Tab 7?

14 A. Not if it's causing harm to the  
15 public.

16 22 Q. And not to delay this  
17 cross-examination because I'm quite surprised by  
18 the answer that you just gave me as a regulated  
19 nurse, what in this code, this document, would  
20 cause harm to the public? Give me an example.

21 A. When they silence nurses from  
22 providing informed consent and education to the  
23 public, and they did not put the -- the public  
24 centre as they said they would. They said public  
25 safety is our top priority, and the CNO did not do

1           that.

2           23                           Q.    No, Ms. Nagle, please.  I'm asking  
3           you with this document at Tab 7, the code, show me  
4           an example of something on one of the pages in this  
5           code that causes harm to the public.

6                           A.    This code itself is accurate, and  
7           it would not cause harm to the public.

8           24                           Q.    Okay.  Now, my understanding,  
9           Ms. Nagle, is that The College of Nurses of Ontario  
10          has two cases open with respect to you:  Case  
11          Number 2020-CR-19984, and the second one is case  
12          Number 2021-CR-26861.

13                           Now, I obviously, don't expect you to  
14          remember those case numbers, but am I first of all  
15          correct in my understanding that two cases were  
16          opened with respect to you by The College of Nurses  
17          of Ontario?

18                           A.    Yes, you are.

19          25                           Q.    Now, I'll deal with the first one  
20          which is Case File Number 2020-CR-19984.  And your  
21          counsel can assist me as he did during Sarah's  
22          cross-examination.  That 2020 case file, was that  
23          initiated or triggered because of complaints from  
24          the London Health Science Centre?

25                           MR. BOISSONNEAU-LEHNER:  Go ahead,

1 Kristen. Give your answer.

2 THE WITNESS: I was just going to say,  
3 I think I -- I believe so.

4 MR. DEARDEN: And, counsel, could you  
5 just -- you know, if that's not right, let me know.

6 MR. BOISSONNEAU-LEHNER: Yes. I'm not  
7 sure if that's right. Again, it's a  
8 Registrar-initiated complaint, so I guess the  
9 Registrar felt there was reasonable and probable  
10 grounds to begin an investigation based on the  
11 information that they received from --

12 COURT REPORTER: I can't hear the end  
13 of your sentence, sir. Sorry.

14 MR. BOISSONNEAU-LEHNER: Oh, I'm sorry  
15 about that. So my understanding -- and I will  
16 correct it in writing if this is wrong -- is that  
17 the Registrar initiated investigation for 2021, and  
18 that the Registrar thought there were reasonable  
19 and probable grounds to initiate the appointment of  
20 an investigator.

21 What those reasonable and probable  
22 grounds are, I'm not sure. I'm not the Registrar,  
23 but complaints from Ms. Nagle's previous employer  
24 could be one of those grounds, but I'm not sure  
25 what ultimately led to the appointment of the

1 investigator.

2 MR. DEARDEN: And there was an  
3 investigator appointed?

4 MR. BOISSONNEAU-LEHNER: Yes, there  
5 was.

6 MR. DEARDEN: For what I'll call the  
7 2020 file, and we'll call the other one the 2021  
8 file, so there was an investigator appointed, and  
9 can I have a copy of that appointment because the  
10 one at Exhibit F does not appear to be related to  
11 the 2020 case. It's the 2021 case.

12 U/A MR. BOISSONNEAU-LEHNER: I'll take that  
13 under advisement.

14 MR. DEARDEN: Am I correct, either  
15 Ms. Nagle or counsel, that Exhibit F to Ms. Nagle's  
16 affidavit which is dated an Appointment of  
17 Investigator dated October 7, 2021, would not be  
18 relating to the 2020 case?

19 MR. BOISSONNEAU-LEHNER: Yes, it's a  
20 separate file.

21 MR. DEARDEN: Because in my  
22 understanding, to both of you, is that the  
23 investigator for the 2020 case was appointed  
24 November 19th, 2020. Am I correct on that?

25 MR. BOISSONNEAU-LEHNER: I don't have

1           that notice of investigator in front of me right  
2           now. I can let you know at least.

3                       MR. DEARDEN: Okay. And as I said,  
4           I've asked to have produced the appointment of the  
5           investigator who I believe was appointed November  
6           2020.

7                       BY MR. DEARDEN:

8           26               Q. My next question, Ms. Nagle, is  
9           you attached Exhibit F, which relates to the 2021  
10          case. Why didn't you attach the appointment of the  
11          investigator for the 2020 case?

12                      A. It didn't seem relevant at this  
13          time.

14          27               Q. That's your reason? That's your  
15          reason, that you didn't --

16                      A. Yes.

17          28               Q. -- attach...

18                      A. You're talking about the November  
19          2020 one?

20          29               Q. Yes.

21                      A. Or November of 2020? Yes.

22          30               Q. Well, can you turn up Tab 11 of  
23          the documents brief. And this is a CBC article  
24          published by Colin Butler on January 11, 2021. And  
25          its headlined: (as read)



1 "Regulator investigating two  
2 Ontario nurses who travelled to D.C.  
3 rally promoting COVID fraud  
4 conspiracy."

5 And if you turn to the second page, I'm looking  
6 for -- under, It's Shocking: (as read)

7 "Doris Grinspun, CEO of the  
8 Registered Nurses Association of  
9 Ontario calls the views promoted by  
10 Global Frontline Nurses pure  
11 conspiracy theory. It's damaging  
12 because what people need is factual  
13 information. Grinspun, who has  
14 filed a complaint against Nagle with  
15 The College over her past activity  
16 said in an interview: When you hear  
17 this from one of your own, and in  
18 this case, two of our own, one RN  
19 and one RPN, it's shocking."

20 Now, was the 2020 case involving the CEO of the  
21 Registered Nurses Association of Ontario who finds  
22 your position shocking, is that part of that case,  
23 that 2020 case?

24 R/F MR. BOISSONNEAU-LEHNER: I object, but  
25 consistent with directions from Justin Burmett

1 (phonetic), I think the witness can answer, and  
2 we'll deal with the objection.

3 COURT REPORTER: Sir, I'm sorry. It's  
4 really hard to hear you for some reason. I'm not  
5 sure why.

6 R/F MR. BOISSONNEAU-LEHNER: I'm sorry. I  
7 think it's both my voice, and I'm sitting too far  
8 from my microphone. So I've objected to that  
9 question, but consistent with the direction  
10 provided by Justin Burmett (phonetic), the witness  
11 can answer, and we'll deal with the objection  
12 afterwards.

13 BY MR. DEARDEN:

14 31 Q. So, Ms. Nagle, what do you have to  
15 say about Doris Grinspun, CEO of the Registered  
16 Nurses Association of Ontario, comments about your  
17 organization?

18 A. Well, one, I'm not sure how much  
19 I'm allowed to talk about the disclosures in our  
20 case documents because they did say that they are  
21 confidential. But since that's in the -- like, a  
22 media article, I don't remember ever seeing  
23 anything other than this comment from Doris.

24 32 Q. So in the 2020 case or the 2021  
25 case, even though this report says that she filed a

1 complaint against you with The College, you don't  
2 recall any information being provided to you by The  
3 College regarding or coming from either Doris  
4 Grinspun or somebody at the Registered Nurses  
5 Association of Ontario?

6 A. Not that I recall at this time.

7 33 Q. Well, I'd like you to check what  
8 you have received from The College and what you are  
9 involved with in terms of your professional conduct  
10 and confirm to me whether Doris Grinspun's  
11 complaint is part of one of those cases or not.

12 U/A MR. BOISSONNEAU-LEHNER: We'll take  
13 that under advisement.

14 MR. DEARDEN: Thank you.

15 BY MR. DEARDEN:

16 34 Q. And did you sue Doris Grinspun  
17 and/or the Registered Nurses Association of Ontario  
18 for libel?

19 A. No. I've never been in a libel  
20 case before or have sued anyone before this -- this  
21 case.

22 35 Q. Okay. So the only -- the only  
23 libel action that you've been involved in is this  
24 one, the one against the Canadian Nurses  
25 Association?

1 A. Correct.

2 36 Q. And to your knowledge, Ms. Nagle,  
3 is this the only libel action brought by Canadian  
4 Frontline Nurses?

5 A. Yes.

6 37 Q. Now, still on the 2020 case of The  
7 College, was there an investigator's report that  
8 was reviewed by a panel of the Inquiries,  
9 Complaints and Reports Committee?

10 U/A MR. BOISSONNEAU-LEHNER: I object. Go  
11 ahead and answer.

12 MR. DEARDEN: You object, and I didn't  
13 catch the last part.

14 MR. BOISSONNEAU-LEHNER: But Ms. Nagle  
15 can answer --

16 COURT REPORTER: Oh, you've cut out,  
17 sir. I'm sorry. I didn't hear that. But Ms.  
18 Nagle can answer, and then you cut out.

19 MR. BOISSONNEAU-LEHNER: But she can  
20 answer consistent with the directions that we've  
21 received from Justin Burmett (phonetic) in terms of  
22 how to deal with objections.

23 BY MR. DEARDEN:

24 38 Q. So go ahead, Ms. Nagle.

25 A. I'm sorry. You may have to repeat

1 the question for me.

2 39 Q. Was there an investigator's report  
3 that was reviewed by a panel of the Inquiries,  
4 Complaints and Reports Committee on October 6,  
5 2021? And we're talking about the first case, the  
6 2020 case.

7 A. Is that the -- the ICRC, or -- I'm  
8 not sure about dates or...

9 40 Q. Well, I'm more interested in  
10 whether there was an investigator's report for that  
11 2020 case.

12 A. I -- I believe there was a report  
13 completed.

14 41 Q. And I would like it produced.

15 R/F MR. BOISSONNEAU-LEHNER: So I've  
16 refused production on the basis of relevance, but  
17 if I change my mind, I'll let you know.

18 MR. DEARDEN: Okay. Now, there is a  
19 decision in reasons of the Inquiries, Complaints  
20 and Reports Committee of The College of Nurses of  
21 Ontario, and it is signed -- the date of the  
22 decision is October 6, 2021, and it's signed  
23 November 18, 2021, by panel chair Naomi Thicke  
24 (phonetic). You're aware of that decision and  
25 reasons?

1 A. Yes.

2 42 Q. And it says that on January 29,  
3 2021, Canadian Nurses of Ontario or College of  
4 Nurses of Ontario received a letter of report from  
5 London Health Science Centre detailing: (as read)

6 "Concerns regarding the  
7 practice and conduct of Kristen  
8 Nagle. In July 2020 and following,  
9 The College of Nurses of Ontario  
10 received several reports from  
11 members of the public and the  
12 Registered Nurses Association of  
13 Ontario expressing concerns  
14 regarding the member's social media  
15 posts."

16 So does that assist your memory of Doris Grinspun's  
17 complaint against you that I referred to in the  
18 article that you find at Tab 11 of the documents  
19 brief?

20 R/F MR. BOISSONNEAU-LEHNER: I object to  
21 the question.

22 But, Ms. Nagle, go ahead.

23 THE WITNESS: To be honest, no, that  
24 was a long time ago, and I do not recall. It's a  
25 big document.

1 BY MR. DEARDEN:

2 43 Q. What's a big document? If I heard  
3 you right, did you say it's a big document?

4 A. Yes, I guess, our -- our  
5 disclosure is from the -- The College of Nurses  
6 Ontario.

7 44 Q. Okay. But what I quoted from was  
8 a decision and reasons that are dated October 6,  
9 2021. And just to refresh your memory here, The  
10 College says it received -- in July 2020 and  
11 following, it received several reports from members  
12 of the public and the Registered Nurses Association  
13 of Ontario expressing concerns regarding your  
14 social media report -- posts.

15 Does that assist you in remembering  
16 that Doris Grinspun, CEO of Registered Nurses  
17 Association of Ontario, complained about your  
18 social media posts?

19 A. I've only ever seen her do it  
20 publicly on her Twitter account.

21 45 Q. Okay.

22 MR. DEARDEN: Well, part of my request,  
23 counsel, would be whatever information The College  
24 provided to Ms. Nagle regarding the complaint from  
25 the Registered Nurses Association of Ontario and

1 specifically Doris Grinspun, which is spelled, by  
2 the way, Madam Reporter, G-R-I-N-S-P-U-N.

3 COURT REPORTER: Thank you.

4 MR. DEARDEN: Doris with one 'R'.

5 COURT REPORTER: Thank you.

6 U/A MR. BOISSONNEAU-LEHNER: I'll take it  
7 under advisement.

8 MR. DEARDEN: Okay.

9 BY MR. DEARDEN:

10 46 Q. Now, the reasons for decision at  
11 page 7 say that: (as read)

12 "Upon review of the information  
13 obtained through the investigation,  
14 it's the Committee's view that you  
15 failed to maintain the profession's  
16 standards by making public  
17 statements on social media  
18 platforms, Facebook, and Instagram,  
19 which were false, inaccurate, or  
20 seriously misleading with respect to  
21 the COVID-19 virus, vaccines, and/or  
22 pandemic response and in which you  
23 identified yourself as or were  
24 identified by others as a nurse."

25 And then a few paragraphs later, the decision says:



1 (as read)

2 "A nurse cannot use their title  
3 as a nurse to lend legitimacy to  
4 statements about health matters  
5 which are plainly false, inaccurate,  
6 or misleading based on available  
7 scientific evidence."

8 Do you recall that part of the decision of the  
9 Inquiries, Complaints and Reports Committee?

10 A. Yes.

11 47 Q. And the Committee also in its  
12 reasons said: (as read)

13 "You made false or misleading  
14 statements about the public health  
15 response to COVID-19, and your  
16 comments weren't based on evidence,  
17 spread what would be dangerous  
18 misinformation, and are directly  
19 contrary to public health  
20 guidelines. You identified yourself  
21 as a nurse or were identified as a  
22 nurse in making these statements.  
23 This conduct may create a harm to  
24 individuals and negatively impact  
25 public confidence in public health

1 measures and the public's perception  
2 of the nursing profession.

3 And you have encouraged defiance  
4 of public health orders. As a  
5 nurse, your defiance of public  
6 health orders may undermine public  
7 confidence in public health measures  
8 and affect the public perception of  
9 the nursing profession."

10 Do you recall those findings of the Committee?

11 A. Yes, and I disagree with all of  
12 them.

13 48 Q. Okay. And just to wrap up here on  
14 this Inquiries, Complaints and Report Committee  
15 decision and reasons: (as read)

16 "The conclusion of the  
17 Committee is that it's determined  
18 that it is consistent with The  
19 College's mandate of public  
20 protection to require you to  
21 complete a specified continuing  
22 education or remediation program and  
23 to appear before the Committee to be  
24 cautioned in relation to The  
25 College's professional standards

1 standards, code of conduct, and  
2 ethics."

3 Do you recall that determination by the Committee?

4 A. Yes, I do.

5 49 Q. And then also in the conclusion:  
6 (as read)

7 "As a nurse, you are  
8 accountable to the public and  
9 responsible for ensuring that your  
10 practice and conduct meet  
11 legislative requirements and the  
12 standards of the profession.

13 Being a member of the nursing  
14 profession brings with it the  
15 respect and trust of the public.

16 To continue to deserve this  
17 respect, nurses have a duty to  
18 uphold the standards of the  
19 profession and conduct themselves in  
20 a manner that reflects well on the  
21 profession."

22 Do you agree with that statement, Ms. Nagle?

23 A. I -- I was absolutely protecting  
24 the public and exhibiting standards of -- of  
25 practice for what nurses should do to protect the

1 public and stand up for them. And --

2 50 Q. But let me unpack this to see if  
3 you agree with the statements. So as a nurse, do  
4 you agree that you are accountable to the public  
5 and responsible for ensuring that your practice and  
6 conduct meet legislative requirements and the  
7 standards of the profession? Do you agree with  
8 that statement?

9 A. I agree I'm accountable to the --  
10 the public and then earn their trust and owe it to  
11 them to speak truth and to always protect them.

12 51 Q. And do you agree that being a  
13 member of the nursing profession brings with it the  
14 respect and trust of the public?

15 A. Absolutely, which I intend on  
16 honouring.

17 52 Q. And to continue to deserve that  
18 respect, do you agree that nurses have a duty to  
19 uphold the standards of the profession and conduct  
20 themselves in a manner that reflects well on the  
21 profession?

22 A. Yes, which I absolutely believe I  
23 was doing by protecting the public and providing  
24 them truth, accurate evidence, and speaking up for  
25 their voices.

53 Q. Okay. So this decision of the  
Committee sets out a remediation program that you  
were supposed to undertake, one of which was an  
Ethics and Boundaries Program. So within three  
months of the date of the decision, you were  
supposed to register for the -- it's called Probe:  
Ethics and Boundaries Program, and provide proof of  
registration, and that was one of the remediation  
activities you were supposed to undertake?

R/F MR. BOISSONNEAU-LEHNER: I object to  
this question, but consistent with the directions  
from Justin Burmett (phonetic), Ms. Nagle may  
answer.

BY MR. DEARDEN:

54 Q. So my question, Ms. Nagle, was,  
did you register for the Ethics and Boundaries  
Program as the details of the remediation program  
and the decision required you to do?

A. I did not. I do not believe that  
I need re-education on ethics. I believe The  
College of Nurses Ontario does.

55 Q. So you didn't comply with what the  
Committee's decision required you to do in terms  
registering and also taking the Ethics and  
Boundaries Program?

1 A. Not this time.

2 MR. BOISSONNEAU-LEHNER: Same --

3 MR. DEARDEN: Sorry?

4 MR. BOISSONNEAU-LEHNER: Her answer was  
5 "not this time," and just before, I said same  
6 objection.

7 R/F MR. DEARDEN: I'm not sure I understand  
8 that answer.

9 BY MR. DEARDEN:

10 56 Q. You didn't take the program; is  
11 that correct?

12 A. Correct.

13 57 Q. And The College wrote you on March  
14 18, 2022, and said you haven't provided proof of  
15 registration in the probe, Ethics and Boundaries  
16 Program as required by the decision of the  
17 Inquiries, Complaints and Report Committee dated  
18 October 6, 2021.

19 R/F MR. BOISSONNEAU-LEHNER: Objection.

20 MR. DEARDEN: Objection, yes.

21 BY MR. DEARDEN:

22 58 Q. And answer? That's correct? The  
23 College wrote you March 18, 2020, to say you  
24 haven't registered, Ms. Nagle?

25 A. I don't think the communications

1                   were directly to me.

2           59                   Q.     Well, it was to your counsel who  
3                   would have provided you this letter of March 18,  
4                   2022, from The College.

5           R/F               MR. BOISSONNEAU-LEHNER:  Objection.

6                   BY MR. DEARDEN:

7           60                   Q.     So you're aware, Ms. Nagle, that  
8                   as of March 18, 2022, The College was saying you  
9                   have not provided proof of registration in the  
10                  probe, Ethics and Boundaries Program as required by  
11                  the decision of the Inquiries, Complaints and  
12                  Reports Committee dated October 6, 2021?

13          R/F               MR. BOISSONNEAU-LEHNER:  Objection.

14          Ms. Nagle may answer that.

15                   THE WITNESS:  I -- I believe there is  
16                   ongoing communications with The College that we are  
17                   working with our counsel.

18                   BY MR. DEARDEN:

19          61                   Q.     But this is a pretty simple  
20                   question.  March 18, 2022, The College writes your  
21                   counsel and says that you have not provided proof  
22                   of registration in the probe for Ethics and  
23                   Boundaries Program as the decision required you to  
24                   do.  And is it correct that, as of March 18, 2022,  
25                   you had not registered for that program?

1 A. It is correct at that date, I have  
2 not registered.

3 62 Q. Okay. Have you registered as of  
4 today?

5 R/F MR. BOISSONNEAU-LEHNER: Objection.  
6 BY MR. DEARDEN:

7 63 Q. So you're allowed to answer.

8 A. I have not.

9 64 Q. Okay. And then it's also my  
10 understanding that you received -- or your counsel  
11 received on November 29, 2021, for this -- or  
12 actually, that's -- sorry -- that's the 2021 case,  
13 so let me not get ahead of myself here. And then I  
14 won't forget to ask you that question.

15 So just finishing off on the 2020 case,  
16 and your counsel can help you here, if you go to  
17 Tab 19 of the brief, the documents brief, there is  
18 a Draft Notice of Application to Divisional Court  
19 for judicial review between you as the Applicant  
20 and The College of Nurses of Ontario as the  
21 Respondent. And I said draft because you needed an  
22 extension of time to file this Notice of  
23 Application, so it's not one that was entered at  
24 least at that time, which is dated March 25, 2022.

25 But do you recognize this Notice of



1 Application to Divisional Court for judicial review  
2 which is dated in March of 2022 but not filed with  
3 the Divisional Court yet?

4 R/F MR. BOISSONNEAU-LEHNER: Just,  
5 Mr. Dearden, I'm going to object to -- register  
6 objections to the line of questioning relating to  
7 the separate proceeding, but Ms. Nagle can answer.

8 THE WITNESS: I do recognize this  
9 document.

10 BY MR. DEARDEN:

11 65 Q. Right. So if you turn to  
12 paragraph 1 of this application, so it would be the  
13 third page in, and it's an application; 1(a) says:  
14 (as read)

15 "An application for an order  
16 setting aside the decision of the  
17 Inquiries, Complaints and Reports  
18 Committee of The College of Nurses  
19 of Ontario."

20 Was that the decision that I just asked you  
21 questions about that was dated October 6, 2021, and  
22 signed November 18, 2021? And your counsel can  
23 answer. I don't care. I just want to know if --  
24 what decision this judicial review application is  
25 seeking to set aside.

1 MR. BOISSONNEAU-LEHNER: Yes, subject  
2 to my objection, it's the 2020 -- what we've been  
3 referring to as the 2020.

4 COURT REPORTER: I missed the last  
5 part. It's the 2020...

6 MR. BOISSONNEAU-LEHNER: The 2020  
7 investigation and the ICRC report that resulted  
8 from that.

9 MR. DEARDEN: You're just fading out  
10 again, Alex. The last part of your answer we  
11 didn't catch.

12 MR. BOISSONNEAU-LEHNER: Sorry. I'll  
13 adjust my mic over the next break. But it pertains  
14 to the 2020, what we've been calling the 2020  
15 investigation and the ICRC report that was  
16 generated as a result of that 2020 investigation.

17 MR. DEARDEN: When you say a report,  
18 you're talking the decisions and reasons that I've  
19 been referring to?

20 MR. BOISSONNEAU-LEHNER: Correct, of  
21 the Inquiries, Complaints and Reports Committee.

22 MR. DEARDEN: Right, which was a  
23 decision dated October 6, 2021, and was signed  
24 November 18, 2021.

25 MR. BOISSONNEAU-LEHNER: Correct.

1 MR. DEARDEN: Okay. Got it.

2 BY MR. DEARDEN:

3 66 Q. And has the Notice of Application  
4 for judicial review now been accepted for filing by  
5 the Divisional Court?

6 MR. BOISSONNEAU-LEHNER: May I answer?

7 MR. DEARDEN: Yes, of course.

8 R/F MR. BOISSONNEAU-LEHNER: So again,  
9 subject to my objection to this line of  
10 questioning, no, it has not. The application to  
11 extend time was unsuccessful in Ms. Nagle's case.

12 MR. DEARDEN: Okay. Well, we can deal  
13 with this --

14 BY MR. DEARDEN:

15 67 Q. Well, why don't we now go to the  
16 Find a Nurse tab for Ms. Nagle, which is Tab 5,  
17 Ms. Nagle.

18 A. Yes.

19 68 Q. And if you go three pages in, you  
20 see under Cautions, it says: (as read)

21 "This order of the ICRC is  
22 subject to a judicial review  
23 application."

24 MR. DEARDEN: So is there another  
25 judicial review application, counsel, or is this

1 out of date?

2 MR. BOISSONNEAU-LEHNER: There is not,  
3 unless Ms. Nagle hired other counsel. But to my  
4 knowledge, there is not any further judicial review  
5 applications relating to The College of Nurses of  
6 Ontario.

7 MR. DEARDEN: Okay. So before I  
8 forget, let's make as Exhibit 7 the Document Number  
9 5 in the documents brief, which is the Find a Nurse  
10 pages for Kristen Nagle on The College of Nurses of  
11 Ontario website.

12 COURT REPORTER: All right.

13 EXHIBIT 7: Find a Nurse pages for  
14 Kristen Nagle

15 BY MR. DEARDEN:

16 69 Q. And if you flip to the next page  
17 under Remedial Activities of the Find a Nurse  
18 document, Ms. Nagle, again, there's a note: The  
19 order of the ICRC is subject to a judicial review  
20 application. I take it that's out of date; there  
21 is no judicial review application in play today?

22 MR. DEARDEN: Or, counsel, you can  
23 answer.

24 MR. BOISSONNEAU-LEHNER: Yes, there is  
25 not.

1 MR. DEARDEN: Okay. Now, going back to  
2 what you were hoping to be a Notice of Application  
3 to Divisional Court for judicial review at Tab 19,  
4 when we go to the page 7 of that document, and it  
5 would be paragraph 2(p) as in Peter; it's also  
6 brief page 105 at the top right-hand corner, but do  
7 you have that, Ms. Nagle?

8 A. Yes, I do. I'm looking at it.

9 70 Q. Okay. So this relief that's being  
10 sought or you were hoping to obtain is: (as read)

11 "A temporary stay of all  
12 College of Nurses of Ontario  
13 proceedings against you pending the  
14 final determination of this  
15 application for judicial review  
16 because --

17 And then I'm looking at the second item under  
18 paragraph 2(p), which says: (as read)

19 "The Applicant will suffer  
20 irreparable harm if the stay is not  
21 granted because her Charter Rights  
22 will be infringed and her reputation  
23 will be damaged."

24 You see that?

25 A. I do.

1           71                   Q.    So it was your position that the  
2                            Canadian -- or The College of Nurses of Ontario  
3                            proceedings against you damaged your reputation?

4                            A.    There have been different  
5                            instances and different varying levels throughout  
6                            the past year and a half of -- of harm against me.

7           72                   Q.    Of what against you?

8                            A.    Of -- of harm and my reputation,  
9                            there's been varying degrees and levels of that.

10          73                   Q.    Caused by proceedings of The  
11                            College of Nurses?

12                            A.    It is one avenue.

13          74                   Q.    It's one cause --

14                            A.    Yes.

15          75                   Q.    -- of damage to your reputation;  
16                            you're agreeing with that?

17                            A.    Yes.

18          76                   Q.    Okay. Now, let's go to the second  
19                            case. It's The College Case Number is 2021 --  
20                            CR-26861. What's that case about?

21                            A.    I'm sorry? Did you just read,  
22                            like, a case number? I don't remember the case  
23                            numbers attached to which --

24          77                   Q.    Yes. It's what I understand is  
25                            the second case against you, and if you look --

1 maybe it can help if you look at, you know, your  
2 Exhibit F, which is the appointment of the  
3 investigator, and that's Tab 9 of the brief, the  
4 documents brief. This appointment of investigator  
5 says that: (as read)

6 "The executive director and CEO  
7 of The College appointed a person to  
8 inquire into and examine the conduct  
9 or actions of Kristen Nagle to  
10 ascertain whether Kristen Nagle has  
11 committed an act of professional  
12 misconduct or is incompetent in  
13 respect of --

14 And then there's three matters set out under  
15 respect of. First is demonstration of knowledge,  
16 skill, and judgment. Second is professional  
17 conduct outside of the workplace, and the third is  
18 fulfilling reporting obligations to the Colleges of  
19 nurses -- College of Nurses. So does that refresh  
20 your memory about what this case is about?

21 A. Yes.

22 78 Q. So what's it about?

23 A. I believe this case was initiated  
24 after our hospital rallies.

25 79 Q. So the September 1st, 2021

1 rallies --

2 A. Yes.

3 80 Q. -- outside of hospitals?

4 A. Yes.

5 81 Q. And what is it that you did or  
6 alleged to have done or said that prompted this  
7 investigation?

8 A. I don't believe there was anything  
9 I said or did. I believe it had to do with a lot  
10 of the media reports that stated what they thought  
11 we did and why we were there, which was misleading  
12 and -- and false.

13 82 Q. But what has The College alleged?  
14 I know you disagree with them, but what did they  
15 allege you did or said that prompted the  
16 appointment of this investigator by the CEO of The  
17 College?

18 A. I'm -- I'm sure -- I'm just not  
19 sure how much details I'm allowed to get into with  
20 a confidential disclosure. Could be advised on  
21 that, then. I just -- I don't know.

22 MR. BOISSONNEAU-LEHNER: Well, I'm not  
23 allowed to help you, but I haven't objected to  
24 that question, so if you can give Mr. Dearden your  
25 understanding with respect to what the --



1                   A.    I -- sorry. My understanding was  
2                   reports that came in from the -- the public that we  
3                   were abusive, obstructing care. We were an angry  
4                   mob, I think was one of the terms used, that we  
5                   were disruptive, and that we were against  
6                   healthcare workers, and it was all false and  
7                   misleading comments.

8                   MR. DEARDEN: Well, I think I've put  
9                   this on the record, counsel, but I do want, for  
10                  this second case, this case 2021-CR-26861, the  
11                  complaints, the disclosure package, the  
12                  investigator's report; I want to know what  
13                  allegations were made against Ms. Nagle that  
14                  prompted this case.

15                  THE WITNESS: And may I add? Or...

16                  BY MR. DEARDEN:

17       83                  Q.    Yes, you may.

18                  A.    And it was also highlighted in  
19                  there was -- was The College -- or, sorry -- the  
20                  Canadian Nurses Association -- I'm going to get  
21                  those mixed up all day -- statement that was made  
22                  against us that pushed this forward as well.

23       84                  Q.    Right. And I saw that in your  
24                  affidavit. I've requested that -- that's why I've  
25                  requested the entire package relating to this case.

1 Your counsel and I -- I don't know if you were on  
2 the earlier -- or watching Sarah's  
3 cross-examination, but I have said that you can't  
4 cherry-pick, you know, what might be in that  
5 disclosure package about the Canadian Nurses  
6 Association and not give me the entire context. So  
7 your counsel's objected. I've told him I've  
8 disagreed. Somebody else will make that decision.

9 But do you have anything else to add  
10 about what the allegations were against you?

11 A. Yeah. Just that from the CNA  
12 report and, I would say, Together News, the media,  
13 it shaped public opinion of what they thought we  
14 were there for and their complaints that rolled in  
15 against us. It wasn't for anybody that was there  
16 or witnessed it. It was public complaints from  
17 hearing, hearsay from media reports and the CNA.

18 85 Q. Yes, well, speaking of hearsay,  
19 that's exactly what you're doing here. What I want  
20 to know is facts that, you know, that you  
21 personally know.

22 You know as a fact, Ms. Nagle, that the  
23 Canadian Nurses Association did not file a  
24 complaint against you with the The College of  
25 Nurses, correct?

1 A. Correct.

2 86 Q. And you know as a fact that  
3 Tim Guest never filed a complaint against you with  
4 The College of Nurses of Ontario, correct?

5 A. Correct.

6 87 Q. And you know as a fact that  
7 Mike Villeneuve never filed a complaint against you  
8 with The College of Nurses of Ontario, correct?

9 A. Correct.

10 88 Q. And you know that Together News  
11 Inc. and William Horter never filed a complaint  
12 against you to The College of Nurses of Ontario,  
13 correct?

14 A. Correct.

15 89 Q. Okay. So we know that there was  
16 an investigator appointed October 7, 2021. Did  
17 that investigator write a report?

18 A. The November --

19 90 Q. No. The October -- so looking at  
20 Exhibit F --

21 A. The --

22 91 Q. Yes, we're in the 2021 case, and  
23 the investigator was Alexandra Peros, P-E-R-O-S.  
24 Did that investigator write a report?

25 A. Not that I'm aware of.

1 MR. DEARDEN: Counsel?

2 R/F MR. BOISSONNEAU-LEHNER: Well, subject  
3 to my objection to producing it, as part of the  
4 disclosure package, there is a summary of incidents  
5 which I understand was authored by the  
6 investigator, but not a formal report in terms of  
7 these are my findings or anything like that. It's  
8 just a summary of incidents essentially.

9 MR. DEARDEN: And that went to the  
10 Committee?

11 MR. BOISSONNEAU-LEHNER: No, not yet.  
12 This case has not yet been referred to -- as I  
13 understand it, this case has not yet been referred  
14 to the ICRC as we have not responded to the  
15 disclosure package that was provided. We haven't  
16 provided our response yet. I think we are awaiting  
17 that before they send it up to ICRC.

18 COURT REPORTER: Before you send it  
19 up -- where? To IC? Sorry?

20 MR. BOISSONNEAU-LEHNER: ICRC.

21 COURT REPORTER: Thank you.

22 MR. DEARDEN: So your due date for  
23 responding to the disclosure package is when?

24 R/F MR. BOISSONNEAU-LEHNER: Objection.  
25 But I'll answer. I believe it's been extended to

1 August 2nd of this year.

2 MR. DEARDEN: Okay.

3 BY MR. DEARDEN:

4 92 Q. And you also received a letter on  
5 October 14, 2021, Ms. Nagle, for this Case Number  
6 2021-CR-26861. No, that actually was the Notice of  
7 Appointment. What I was looking for was the  
8 extended -- or actually November 29, 2021, your  
9 counsel received from The College a letter that  
10 says: (as read)

11 "Further to my correspondence  
12 dated October 14, 2021 --  
13 which I just referred to -- (as read)

14 "-- The College has received  
15 additional information that raises  
16 concern about your client's practice  
17 or conduct. And the Inquiries,  
18 Complaints and Reports Committee has  
19 approved an expanded investigation  
20 into your practice or conduct. The  
21 investigation includes but is not  
22 limited to the following: Actions  
23 and/or omissions regarding the  
24 security, confidentiality, or  
25 privacy of client records or

1 information."

2 And you were provided a copy of this letter by your  
3 counsel, Ms. Nagle?

4 A. Yes.

5 93 Q. And so that's another incident, if  
6 I can use that word, that The College has notified  
7 you about, correct?

8 A. Correct.

9 94 Q. And what is the status of that  
10 matter?

11 R/F MR. BOISSONNEAU-LEHNER: Objection.  
12 But, Ms. Nagle, what's your understanding?

13 THE WITNESS: I -- I don't believe that  
14 it has moved forward. I -- I don't -- I'm not  
15 aware of any updates.

16 BY MR. DEARDEN:

17 95 Q. Okay. Now, let's go to Find a  
18 Nurse at Tab 5. We looked at Cautions. We looked  
19 at the remediation activities or Remedial  
20 Activities. But there's also an item for Charges.  
21 And you'll see that about three pages in.  
22 Underneath Cautions, you see Charges?

23 A. Yes.

24 96 Q. Tab 5. And so it's saying: (as  
25 read)

1 "April 26, 2021, the member was  
2 charged in Ontario with the  
3 following: Failing to comply with a  
4 continued order originally made  
5 under the Emergencies Management and  
6 Civil Protection Act contrary to the  
7 Reopening Ontario Act --

8 Take out some words just to save time. And another  
9 one on April 26, 2021: (as read)

10 "The member was charged in  
11 Ontario with the following: Failing  
12 to comply with a continued order  
13 originally made under the Emergency  
14 Management and Civil Protection Act  
15 contrary to the Reopening Ontario  
16 Act."

17 So these were charges laid against you for  
18 violating those acts?

19 R/F MR. BOISSONNEAU-LEHNER: Objection.

20 BY MR. DEARDEN:

21 97 Q. So you're allowed --

22 MR. BOISSONNEAU-LEHNER: Ms. Nagle, if  
23 I object, just go ahead and answer.

24 THE WITNESS: Okay. Sorry. Thank you.

25 Yes, they were -- they were the summons.

1 BY MR. DEARDEN:

2 98 Q. Summons to do what? Appear in  
3 court and defend the charges?

4 A. Yes.

5 99 Q. I got -- my Notice of  
6 Examination -- and counsel requested documents  
7 relating to the charges. But if it's summons that  
8 we're talking about that's supposedly the charge,  
9 that would be something that I would want produced  
10 to know what it is that Ms. Nagle allegedly did  
11 that she's charged with.

12 Like, have those charges been dealt  
13 with, Ms. Nagle, the April 2021 charges?

14 A. They are still ongoing. It is  
15 when we were locked in our homes. They're for  
16 being in public.

17 100 Q. Well, you were allowed to go out  
18 in public to go buy groceries or to run 25 miles,  
19 but what exactly did you do in public that caused  
20 you to be charged in April 2021?

21 A. I spoke about --

22 R/F MR. BOISSONNEAU-LEHNER: Objection.

23 THE WITNESS: Oh, sorry. I spoke.

24 BY MR. DEARDEN:

25 101 Q. You spoke as in you gave a speech



1 at a rally?

2 A. At a protest, yes.

3 102 Q. And that happened where?

4 A. London, it would be the November  
5 one. I don't recall April 26 where that was.

6 103 Q. But you -- what you asked -- you  
7 were coordinating the gathering of people to come  
8 and hear you speak?

9 A. No. I was invited to come speak.

10 104 Q. And so what's the -- what was the  
11 event?

12 A. It was a protest against measures  
13 in place at the time that were harmful and creating  
14 a lot of risk to our public, our communities.

15 105 Q. Yes, but who put on this protest?

16 A. I -- November 22nd, since that --

17 106 Q. No. We're dealing with April.  
18 There was two charges in April 26, 2021. And my  
19 understanding is you were charged for speaking.

20 A. Yes. I just don't recall that --  
21 that date. If I knew what city that was, it would  
22 be helpful. I just -- I don't recall.

23 107 Q. Okay. Well, I'd like you to make  
24 efforts to find out --

25 COURT REPORTER: Oh, you cut out, sir.

1 Oh, you muted yourself.

2 MR. DEARDEN: Muted myself. Sorry.

3 COURT REPORTER: Well, I'd like you to  
4 make efforts to find out...

5 BY MR. DEARDEN:

6 108 Q. What events -- what the event was  
7 that led to the April 26, 2021 charges and what it  
8 is you did or said that caused you to be charged  
9 twice for violating the Emergency Management and  
10 Civil Protection Act.

11 R/F MR. BOISSONNEAU-LEHNER: No, we won't  
12 be giving that undertaking.

13 MR. DEARDEN: That's your objecting?

14 MR. BOISSONNEAU-LEHNER: That's right.

15 BY MR. DEARDEN:

16 109 Q. Okay. And then to just finish  
17 this, November 22, 2020, is another charge that we  
18 see in Tab 5 of the Find a Nurse document, and what  
19 was that about? Or actually, let me put it on  
20 record. So: (as read)

21 "November 22, 2020, the member  
22 was charged in Ontario with filing  
23 to comply with a continuing order  
24 originally made under the Emergency  
25 Management and Civil Protection Act

1 during the COVID-19 emergency  
2 contrary to the Reopening Ontario  
3 Act and hosting a public event at a  
4 proscribed premises where the number  
5 of people in attendance exceeded the  
6 number permitted under a continuing  
7 ordinary made under the Emergency  
8 Management and Civil Protection Act  
9 contrary to the Reopening Ontario  
10 Act."

11 So what was the public event that you were alleged  
12 to have hosted where the number of people in  
13 attendance exceeded what the law allowed?

14 R/F MR. BOISSONNEAU-LEHNER: Objection.

15 THE WITNESS: I -- this one is in the  
16 media, so it is public knowledge. I did host a  
17 protest against the mandates that were currently  
18 in -- in place, and people gathered in a --

19 BY MR. DEARDEN:

20 A. -- peaceful assembly that is part  
21 of our Constitutional rights.

22 110 Q. And they gathered in what city?

23 A. This is in London.

24 111 Q. And what were the mandates that  
25 you say you were protesting? Anti-mask?

1                   A.    It was masks specifically on  
2                   children at the schools. The schools were shut  
3                   down. We were in lockdowns. We were not allowed  
4                   to leave our -- our homes; the -- the travel  
5                   restrictions, not -- all of them that were not  
6                   supported by any evidence at that time or any  
7                   scientific evidence.

8    112                   Q.    And The College disagrees with  
9                   you, right?

10                   A.    Yes, we both disagree with each  
11                   other.

12    113                   Q.    And is the November -- I know you  
13                   said the April 26, 2021 charges are still  
14                   outstanding. What's the status of the November 22,  
15                   2020 charge?

16    R/F                   MR. BOISSONNEAU-LEHNER: Objection.

17                   THE WITNESS: Still ongoing.

18                   BY MR. DEARDEN:

19    114                   Q.    It's still ongoing? Okay. Just  
20                   switching to the Canadian Frontline Nurses, you are  
21                   a co-founder?

22                   A.    Yes.

23    115                   Q.    And Sarah Choujounian is the other  
24                   co-founder?

25                   A.    Yes.

1       116                   Q.    And you're also an applicant in  
2                           the Federal Court in Court File T-306-22 where  
3                           you're challenging the constitutionality of  
4                           emergency measures that were invoked during the  
5                           trucker's protest?

6       R/F               MR. BOISSONNEAU-LEHNER:  Objection.

7                           BY MR. DEARDEN:

8       117                   Q.    Is that correct?

9                           A.    Yes.

10      118                   Q.    And you have a separate bank  
11                           account that was used -- that's used solely for  
12                           funds donated towards the legal fees associated  
13                           with that Federal Court file?

14                           A.    Yes.

15      119                   Q.    And how much is in that bank  
16                           account?

17                           A.    I -- I am -- Sarah is more in  
18                           charge of the monetary amounts, the -- the funds,  
19                           so I don't know offhand.  I did hear her say a  
20                           number, but I don't know if that is allowed, like,  
21                           to --

22      120                   Q.    You don't -- well, sure it's  
23                           allowed.  But you don't know offhand how much is in  
24                           that bank account, like --

25                           A.    Well, I heard Sarah state about

1 15,000 offhand at this time. I just have not been  
2 into the statements in a bit.

3 121 Q. Now, does the Canadian Frontline  
4 Nurses have a legal fund-raising bank account for  
5 this libel action?

6 A. I guess not publicly. I guess all  
7 the -- I guess we kind of use that -- those funds  
8 for all the legal cases.

9 122 Q. Which funds?

10 A. Like, it was created for the --  
11 the Federal case at that time.

12 123 Q. But when you say the funds, that's  
13 the bank account that has money in it which Sarah  
14 said was \$15,000 for the Federal Court application?

15 A. Yes, when the Emergency Measures  
16 Act was invoked, we were worried about freezing of  
17 bank accounts.

18 124 Q. Right. So you have that bank  
19 account, \$15,000, Federal Court application  
20 challenging the emergency measures. Do you have a  
21 separate bank account, another bank account for  
22 paying legal fees for this libel action?

23 A. We just have the two accounts.

24 125 Q. What's -- so I've got the 15,000  
25 account, and the other account you're referring to

1 is the one that Sarah said had \$3,000 in it  
2 approximately?

3 A. Correct.

4 126 Q. Okay. No GoFundMe activities  
5 going on to support your bringing this libel action  
6 against Canadian Nurses Association?

7 A. No, not at this time.

8 127 Q. Are you aware of any funding or  
9 financing coming from Global Frontline Nurses?

10 A. No. That organization has since  
11 been dissolved almost over a year ago, about a year  
12 ago.

13 128 Q. Did another organization take its  
14 place?

15 A. No. We were kind of the -- the  
16 sister organization from it, so we kind of moved  
17 away, and then that organization -- organization  
18 dissolved.

19 MR. DEARDEN: Just off the record for a  
20 second.

21 (DISCUSSION OFF THE RECORD)

22 BY MR. DEARDEN:

23 129 Q. So paragraph 17 of your affidavit,  
24 you say: (as read)

25 "My main role in organizing the

1 Canadian Frontline Nurses September  
2 1, 2021, rallies was to coordinate  
3 with individuals and organizations  
4 who I met and who shared Canadian  
5 Frontline Nurses values."

6 So what organizations did you coordinate with?

7 A. I don't necessarily know all the  
8 organization names. I know all the individuals  
9 that I coordinated with, and a lot of them were  
10 nurses or others that we met along our summer tour,  
11 the -- previously before the -- the hospital  
12 rallies that I met in person that organize events,  
13 so it was individuals that I coordinated with and  
14 some being nurses in those areas.

15 130 Q. Did you coordinate with Global  
16 Frontline Nurses?

17 A. No, because that organization,  
18 like, I guess, said is dissolved. That's...

19 131 Q. So Global Frontline Nurses no  
20 longer existed as of September 1, 2021?

21 A. Correct, and -- and before that.

22 132 Q. Do you know approximately the date  
23 that they no longer existed?

24 A. Probably about March of -- of '21.

25 133 Q. I'd like you to give me the names



1 of organizations you're referring to in paragraph  
2 17 of your affidavit. I know you don't remember  
3 them now, but if you could let me know what  
4 organizations you're referring to in paragraph 17,  
5 I'd appreciate that.

6 U/T MR. BOISSONNEAU-LEHNER: We'll do that  
7 for you, Mr. Dearden. Yes.

8 BY MR. DEARDEN:

9 134 Q. Paragraph 28, the last sentence:  
10 (as read)

11 "I also observed and heard  
12 other healthcare workers who were  
13 affiliated with the hospital express  
14 that they were not in favour of the  
15 London rally and its goals."

16 So what did you hear them say?

17 A. There are some that appeared to  
18 emerge from -- from break -- I'm not sure -- that  
19 entered into the parking lot. And they yelled  
20 profanities at us, gave us the finger, called us  
21 pathetic and, yeah, yelled at us to leave, so it  
22 was just yelling profanities and the finger.

23 135 Q. These are hospital workers?

24 A. Yes, they came down in their  
25 scrubs and were wearing, like, the -- the scrub

1 caps.

2 136 Q. And so they were coming out during  
3 a break --

4 A. To hear the --

5 137 Q. -- to have a cigarette?

6 A. No. I don't know what they were  
7 out for. I don't know if they came out for that  
8 and were just there or if they came out  
9 specifically to -- to show their disdain, but  
10 they -- they were clearly on a shift that day.

11 138 Q. And what else did you hear them  
12 say or observe them doing?

13 A. Just body language, just -- just a  
14 lot of hate in their eyes, anger. Like I said,  
15 swearing, a lot of the F-word, and, yeah, and body  
16 language, like I said, giving the -- the finger,  
17 and -- and just yelling.

18 139 Q. And this was the September 1st,  
19 2021 London protest, correct?

20 A. Yeah. It was -- yeah, I just -- I  
21 remember there was a few that came down together.

22 140 Q. And how many people attended the  
23 London rally in your estimation?

24 A. I thought at that time there was  
25 almost 2,000 people. I'm not great with

1           estimating, but that is almost what it looked like,  
2           over -- definitely over a thousand.

3       141                   Q.    When you say "at that time," is  
4           there any significance to that, or -- but this --  
5           sitting here today, your best estimate is it's over  
6           a thousand?

7                   A.    Yeah, sorry. It was -- I think --  
8           I think it was -- it seemed almost about 2,000. It  
9           was definitely over a thousand.

10       142                  Q.    Okay. Now, do you have any video  
11           recordings of the London rally on September 1,  
12           2021?

13                   A.    Yes, I do.

14       143                  Q.    And can you produce them?

15           U/T           A.    Yes, I can.

16       144                  Q.    Okay. So you --

17                   A.    It will show just how organized it  
18           was, safe; we were off hospital property. We were  
19           on the other side of the hospital fence. It was  
20           incredibly peaceful, uplifting. There was [sic]  
21           many nurses, healthcare professionals in the crowd  
22           wearing their scrubs proudly. There's just a lot  
23           of -- a lot of positive support. It was a very  
24           positive, beautiful day.

25       145                  Q.    Well, did you take any footage of

1 the non-positive which was the healthcare workers  
2 coming out of the hospital during break and giving  
3 you the finger and screaming at you and yelling  
4 profanities at you? Did you take footage of that?

5 A. I'm trying to remember if it was  
6 on my Live or not. I'd have to go back and -- and  
7 look.

8 146 Q. Please do because I would like  
9 that produced.

10 U/T MR. BOISSONNEAU-LEHNER: We will. And,  
11 Mr. Dearden, if I may, so I understand -- this will  
12 address one of the undertakings for  
13 Ms. Choujounian's cross-examination. So we are  
14 going to make best efforts to produce videos from  
15 individuals who protested in -- or individuals who  
16 participated in the Canadian Frontline Nurses  
17 protest.

18 Any videos that we can obtain, we're  
19 going to be making best efforts to do so, and we'll  
20 produce all of them and including the Plaintiff's  
21 videos to the extent that they're retrievable.

22 MR. DEARDEN: Okay. Thank you.

23 BY MR. DEARDEN:

24 147 Q. So, Ms. Nagle, you've informed me  
25 earlier that this is the only libel action that you

1 have brought and that the Canadian Frontline Nurses  
2 have brought against any individual or organization  
3 or media, social media, whatever; this is it? This  
4 is the only libel action, right?

5 A. The -- the only one I've ever been  
6 in, yes.

7 148 Q. Okay. So can you turn to Tab 11  
8 which we did briefly look at before. This is  
9 Tab 11 of the documents brief. This is a CBC  
10 article written by Colin Butler January 11, 2021,  
11 headline: (as read)

12 "Regulator Investigating Two  
13 Ontario Nurses Who Travelled to D.C.  
14 Rally Promoting COVID Fraud  
15 Conspiracy."

16 So you did not sue CBC regarding this article or  
17 any CBC article or broadcast that named you,  
18 correct?

19 A. Correct. We did not have legal  
20 representation on that time, and I believe there is  
21 a deadline for doing that kind --

22 149 Q. You didn't --

23 COURT REPORTER: I'm sorry I missed --  
24 I've got: And I believe there is a deadline for,  
25 and then you said something else. I'm sorry.

1 THE WITNESS: Oh, I believe there's a  
2 deadline for bringing in such -- such suits. We  
3 did not have legal representation at that time.

4 BY MR. DEARDEN:

5 150 Q. Okay. Now, there's a Radio-Canada  
6 article at Tab 13 of the documents brief, and it's  
7 dated September 2nd, 2021. The headline is: (as  
8 read)

9 "Reports of one assault, verbal  
10 abuses, thousands protest vaccine  
11 passports outside hospitals across  
12 B.C."

13 Do you see that?

14 A. Yes.

15 151 Q. And you did not sue CB -- or  
16 Radio-Canada for libel with respect to this article  
17 or any other broadcast that they did that involved  
18 you, correct?

19 A. Correct. I believe they were a  
20 lot more careful in their wording with saying  
21 exactly what that top paragraph said, reports of,  
22 and they were reporting things versus stating  
23 things as -- as fact.

24 152 Q. Okay. Now, you posted on  
25 Instagram on February 8, 2022, where you kind of

1 did like a live selfie of yourself, a video  
2 recording of yourself, and amongst other things,  
3 you said: CBC has destroyed my life. Do you  
4 recall that?

5 A. Yes, I do.

6 153 Q. And then that one, that Instagram  
7 posting was about 28 minutes long, and you  
8 extracted five minutes of it and put it up on  
9 YouTube on February 9, 2022. And it says: (as  
10 read)

11 "CBC workers in Ottawa 'must  
12 watch'"

13 And must watch in quotes. So you remember posting  
14 that five-minute video?

15 A. I did not post that video or take  
16 the excerpt. That was not me, but I do remember  
17 the video you're speaking of. I just wanted to  
18 correct that it was not me that did that.

19 154 Q. Okay. So you did Instagram --

20 A. Yes.

21 155 Q. -- on February 8, 2022. And  
22 somebody else created a YouTube on February 9,  
23 2022 --

24 A. Correct.

25 156 Q. -- that extracted five minutes of

1 your Instagram video, correct?

2 A. Yes.

3 157 Q. And, first of all, just to finish  
4 on the YouTube, that five minutes included you  
5 saying: CBC has ruined my career, and CBC has  
6 literally destroyed my life, correct?

7 A. I did say that, yes.

8 158 Q. And who did the YouTube video?

9 A. That, I am not sure. I --

10 159 Q. You don't know? Okay. Okay. And  
11 my last question is this Colin Butler, CBC  
12 reporter, he called up my client, or emailed my  
13 client, The Canadian Nurses Association, and wanted  
14 to ask some questions about your million-dollar  
15 damages libel action. And my client had not yet  
16 been served, and he had a copy of the complaint --  
17 or the Statement of Claim, rather. Do you know who  
18 gave Colin Butler, CBC reporter, a copy of your  
19 Statement of Claim?

20 A. No, absolutely not.

21 160 Q. Okay.

22 MR. DEARDEN: So on that, subject to  
23 all the documents that your counsel's going to give  
24 me, that completes the cross-examination for now,  
25 Ms. Nagle. Thank you very much.



1 THE WITNESS: Thank you.

2 MR. DEARDEN: So we should take --  
3 okay. We're off the record.

4 (DISCUSSION OFF THE RECORD)

5 MR. DEARDEN: Okay. So I would like to  
6 add as Exhibit 8 to the cross-examination the  
7 Notice of Application Divisional Court for judicial  
8 review of Kristal Nicole Pitter [sic] in The College  
9 of Nurses of Ontario which is found at Tab 18 of  
10 the documents brief.

11 MR. BOISSONNEAU-LEHNER: Rick you said  
12 Kristal Pitter. Did you mean Kristen Nagle?

13 MR. DEARDEN: Oh, sorry. Yes. I was  
14 getting ready for the next cross. Yes, thank you,  
15 Marco. Where is the -- I meant 19, so Kristen  
16 Nagle and College of Nurses of Ontario Notice of  
17 Application to Divisional Court for judicial review  
18 found at Tab 19 of the documents brief.

19 EXHIBIT 8: Notice of Application  
20 Divisional Court for judicial review of  
21 Kristen Nagle

22 MR. DEARDEN: Over to you, Paul.

23 KRISTEN NAGLE, PREVIOUSLY SWORN,  
24 QUESTIONED BY MR. CHAMP:

25 MR. CHAMP: Thank you.

1 BY MR. CHAMP:

2 161 Q. So, Ms. Nagle, my name is Paul  
3 Champ. I'm the lawyer for the other Defendants,  
4 Together News and Will Horter, and I just have some  
5 questions for you further to your affidavit in this  
6 matter.

7 I'd like to start by asking you some  
8 questions about the trip to Washington in January  
9 of 2021, the trip that you took with  
10 Ms. Choujounian. You were aware at the time there  
11 was a travel ban on nonessential travel?

12 A. Yes.

13 162 Q. Okay. And you made that trip  
14 notwithstanding that travel ban; is that right?

15 A. I felt it was essential travel.

16 163 Q. Okay. And you -- when you crossed  
17 the border into the United States, what did you  
18 tell the border guards about the nature or purpose  
19 of your trip?

20 A. When we crossed the border, like,  
21 when we entered?

22 164 Q. Yes, when you entered.

23 A. I think we were there for a  
24 nursing summit. There wasn't much [sic] questions,  
25 to be honest. We just went through the regular

1 proceedings of -- of security and the border  
2 crossing, like, at the airport, and then just went  
3 through.

4 165 Q. Were you asked to show any  
5 paperwork or anything like that about your trip,  
6 like, your invitation or anything like that?

7 A. No, just our passports. It was  
8 incredibly easy.

9 166 Q. Now, this event, the Global  
10 Frontline Nurses event, when were you invited to  
11 attend that event approximately how long before?

12 A. I was in communications with nurse  
13 Erin probably sometime in October when she was  
14 trying to organize a nursing summit, so October of  
15 2020.

16 167 Q. And how did you communicate with  
17 her?

18 A. I think I -- initially maybe  
19 through Instagram then Signal.

20 168 Q. And this is Erin Marie Olszewski?

21 A. Yes. I also have difficulty  
22 pronouncing her last name.

23 169 Q. I think I'm close. I hope so.  
24 It's O-L-S-Z-E-W-S-K-I, I believe.

25 And in our Notice of Examination,

1 Ms. Nagle, we had asked you to produce any  
2 documents you may have around your invitation to  
3 the event, any details you have around the  
4 organizing, and then any documents like that. Do  
5 you have any of those kinds of documents?

6 A. I no longer have any documents.  
7 Most of our conversations were either through  
8 Signal, phone call, or Zoom meetings. And since  
9 that time, I have re-installed and uploaded, and I  
10 no longer have access to those conversations.

11 170 Q. Okay. When was the date set? So  
12 you told us that you were speaking with Erin, the  
13 nurse in the United States, starting around  
14 October, about maybe arranging some kind of nursing  
15 summit. When did Erin start talking to you about  
16 January 6th as the date of this event?

17 A. It -- it must have been sometime  
18 in December, but it's been a while ago now that I'm  
19 not so confident on dates.

20 171 Q. Right. Okay. And my  
21 understanding, it was originally planned for  
22 Florida; is that right?

23 A. Yes, correct. It was originally  
24 supposed to be in Tampa, Erin's hometown.

25 172 Q. And then how soon before the event

1           was it shifted to Washington? Was that also in  
2           December?

3                       A. I think -- I think so. Oh, if you  
4           meant the planning of the whole summit, those  
5           conversations took place when I was first in  
6           contact with Erin in October of trying to organize  
7           and plan a nursing summit. But the -- I think --  
8           again, it's a while ago now -- that the -- the  
9           conversation is switched to Washington with  
10          sometime in December.

11   173               Q. Okay. So the location and the  
12          date started coming around in December of 2020; is  
13          that right?

14                    A. Yes.

15   174               Q. Okay. And do you know what the  
16          significance of that date was for Erin?

17                    A. All I knew is that there was an  
18          opportunity to speak on a health freedom stage with  
19          some pretty big names, Kevin Jenkins, Mikki Willis,  
20          Del Bigtree, David Martin, and that we would be  
21          able to reach a larger crowd with our -- our  
22          message.

23   175               Q. So it was a bigger event that you  
24          guys were going to be a part of; is that right?

25                    A. Yeah, and we were invited to speak

1 at the stage, so everything was planned and  
2 organized for us. We just had to show up, versus  
3 Tampa, we were going to have to organize the venue,  
4 the stage, the speakers, invitations, and  
5 everything, so it minimized a lot of the planning  
6 that we were going to have to do on our part.

7 176 Q. Right. So minimize the planning,  
8 and then potentially you might have -- might be  
9 able to speak to a larger audience, I guess?

10 A. Yes.

11 177 Q. And so do you know, then, who was  
12 paying for the stage and the organizing and all  
13 that for the -- for the event?

14 A. I believe at that time our segment  
15 for us to be able to speak, it came through  
16 donations through Global Frontline Nurses.

17 178 Q. But Global Frontline Nurses didn't  
18 organize that stage, did they?

19 A. No. But I'm -- if I remember  
20 correctly, we actually had to -- it came out, like,  
21 days before we had to pay to join the stage for a  
22 segment. But it was Charlene and Ty Bollinger that  
23 were organizing that -- that stage.

24 179 Q. And what was the name of their --  
25 did they have a name of their organization or their

1 movement or whatever, the Bollingers?

2 A. Not that I was aware of at that  
3 time. I just thought it was the health freedom  
4 summit. It was my understanding.

5 180 Q. That was the name of the entire  
6 event? Did you see any of the promotional  
7 materials that they were putting out?

8 A. No. I think just, like, the  
9 health freedom summit that they were doing, like,  
10 because they're -- I believe -- what I was  
11 understanding was there were several different  
12 stages, and we were at a particular stage that was  
13 based around health freedom.

14 181 Q. Right. So there's going to be a  
15 number of different stages and a number of  
16 different events, and you guys were going to be on  
17 the health freedom stage; that was your  
18 understanding?

19 A. Yes.

20 182 Q. So, Ms. Nagle, we produced some  
21 documents to your counsel yesterday that were  
22 obtained from the Freedom Rally 2021.com website.  
23 Were you familiar with that website, Freedom Rally,  
24 2021.com?

25 A. No. I reviewed it yesterday

1 with -- with counsel.

2 183 Q. I'm just going to share my screen  
3 here briefly, show you one of the documents. So  
4 you see this. It's a bit cut off a little bit:  
5 Freedom Rally, Wednesday January 6, 12 p.m. to 4  
6 p.m.; you see there's a photo there of Mr. Del  
7 Bigtree. That's one of the people you're referring  
8 to?

9 A. Yes.

10 184 Q. And Kevin Jenkins, I think you  
11 referred to him as well?

12 A. Yes.

13 185 Q. And there's Ty and Charlene  
14 Bollinger. Those are the people you were talking  
15 about?

16 A. Yes.

17 186 Q. And any of these other people, do  
18 you know who they are?

19 A. Yeah, Mikki Willis, and Dr. David  
20 Martin.

21 187 Q. Okay. And so they all spoke on  
22 this stage after the Global Frontline Nurses?

23 A. Yes.

24 188 Q. Okay. Okay. I'm going to take  
25 you to just the next page. So this is all -- this



1 is -- you see this image. There's a reference to  
2 the Global Frontline Nurses.com, Global Frontline  
3 Nurses summit January 6, 2021, at 9 a.m.,  
4 Washington, D.C. Have you seen this flyer or this  
5 advertisement before?

6 A. Yes.

7 189 Q. Okay. And was this prepared by  
8 Global Frontline Nurses, or was it prepared by the  
9 Bollingers group?

10 A. No. This was prepared by the  
11 Global Frontline Nurses.

12 190 Q. Okay. And how was it distributed  
13 or disseminated publicly; do you know?

14 A. I think through social media.

15 191 Q. And who was responsible for that?  
16 The Global Frontline Nurses?

17 A. Erin.

18 192 Q. Erin. Okay. Erin is in one of  
19 these images, correct?

20 A. Yes.

21 193 Q. And we see you here and also  
22 Ms. Choujounian?

23 A. Yes.

24 194 Q. Okay. And then let's take you to  
25 another one here, and you'll see this page: (as

1 read)

2 "Join us for back-to-back rally  
3 events to hear compelling testimony  
4 and insight from dynamic leaders as  
5 they publicly address immediate and  
6 serious concerns related to liberty  
7 and freedom. Global Frontline  
8 Nurses, 9 a.m. to 10:00 a.m.;  
9 freedom speakers, 10:00 a.m. to 12  
10 p.m.; health freedom speakers, 12  
11 p.m. to 4 p.m."

12 So that looks like the event that you were at?

13 A. Yes.

14 195 Q. Okay. I'll take you to another  
15 document here. So MAGA rally map guide, have you  
16 seen this document?

17 A. No.

18 196 Q. Okay. We'll just scroll through  
19 it: (as read)

20 "Hello Patriots.

21 And it's talking about events to the various maps  
22 for the various events. Here you'll see there's a  
23 bunch of different events set up here, the Save the  
24 Republic Rally, One Nation Under God Rally, Jericho  
25 March, Prayer Walk. So were you aware of these

1 other events going on?

2 A. I -- I wasn't aware of the details  
3 of the events. I just heard there was going to be  
4 other events happening that day.

5 197 Q. Okay. All right. And we don't  
6 see you on here, but let's go down to the next  
7 page. It's this January 6th, 2020, MAGA Rally map  
8 guide, and see the Freedom Rally there on the left  
9 side, 10 a.m. to 4 p.m. --

10 A. Yes.

11 198 Q. (As read)

12 "-- join us Wednesday, January  
13 6, United States Capitol for  
14 gathering to celebrate America,  
15 freedom, health, and life with one  
16 loud voice as one Nation under God,  
17 indivisible with liberty and justice  
18 for all."

19 And you see Global Frontline Nurses 9 a.m. to 10:00  
20 a.m. So that looks like the event that you were  
21 at?

22 A. Yes, our name's there. Yes.

23 199 Q. And you'll see up in the corner  
24 here where the little red arrow is, that looks  
25 approximately where your stage was?

1                   A.    I -- honestly, I have no idea.  Is  
2                   that by the Supreme Court?  I can't really -- I  
3                   don't know the map.

4   200               Q.    Okay.  You were close to the  
5                   Capitol building where you were, though, correct?

6                   A.    It was -- it was walking distance.  
7                   Yes, it was.

8   201               Q.    Yes.  Okay.  And we see these  
9                   other events here, Wild Protest Jericho March, but  
10                  you weren't aware of the specifics of any of those  
11                  events?

12                  A.    I was not.

13   202               Q.    Okay.  And then in the bottom  
14                  right corner, we see here, March for Trump.  You  
15                  see that one, that event?

16                  A.    Yes.

17   203               Q.    (As read)

18                         "Democrats are scheming to  
19                         disenfranchise and nullify  
20                         Republican votes.  It's up to the  
21                         American people to stop it.  The  
22                         Ellipse Rally Doors."

23                  So you weren't aware of that event?

24                  A.    I was not.

25   204               Q.    But you would agree with me,

1 Ms. Nagle, that all of these events do seem  
2 connected in some way; is that fair to say?

3 A. I mean, they were all -- they  
4 seemed -- I mean, they're all happening on the same  
5 day, so...

6 205 Q. Well, they were all inspired in  
7 some way. A lot of the people at all these  
8 different events would seem had a lot of the same  
9 beliefs on many issues?

10 A. I'm sure people had similar  
11 beliefs. I'm sure they also had very different  
12 beliefs.

13 206 Q. Well, so on the issues that were  
14 most important for you, you'd agree with me that  
15 President Trump, for example, he had been promoting  
16 alternative therapies like hydroxychloroquine and  
17 ivermectin; you were aware of that?

18 A. Yes, but he also promoted the  
19 vaccine which was very confusing to me and  
20 helped -- didn't he create -- like, initiate the  
21 warp speed of getting that out to people? So that  
22 was contradictory to my beliefs and values.

23 207 Q. But some of the people you were on  
24 the stage with were Trump supporters, correct?

25 A. They could have been.

1           208                   Q.    Well, you knew, right?  You knew  
2                                   some of them were Trump supporters?

3                                   A.    Like, in our group or, like, on  
4                                   that whole stage?

5           209                   Q.    Well, let's talk about both.  So  
6                                   first in your group.

7                                   A.    Yeah, I guess we knew, not to the  
8                                   extent, but knew that Erin was.

9           210                   Q.    Yes, Erin wore a hat almost all  
10                                  day, a Trump hat, correct?

11                                 A.    Yes.

12          211                   Q.    Almost the whole time you hung out  
13                                  with her, she was wearing her Trump hat, correct?

14                                 A.    Yes.

15          212                   Q.    Okay.  So she was someone who  
16                                  supported Trump, we can assume; is that fair to  
17                                  say?

18                                 A.    Yes.

19          213                   Q.    Okay.  And then some of the other  
20                                  speakers after Global Frontline -- well, what did  
21                                  you do after the Global Frontline speakers event  
22                                  was done?  What did you do after that, after 10:00  
23                                  a.m.?

24                                 A.    I listened to a few of the  
25                                  speakers that I had mentioned, and then I made my

1 way back with two of the other girls to our hotel.

2 214 Q. Okay. And so any of those other  
3 speakers you listened to, did you recall any of  
4 them referring to Donald Trump?

5 A. No, just more about our health and  
6 our rights and -- and freedoms.

7 MR. CHAMP: So, counsel, that package  
8 of documents that was sent to you last night from  
9 the Freedom Rally 2021.com website, we'd ask to  
10 have those introduced as an exhibit, these ones I  
11 just referred to with Ms. Nagle.

12 EXHIBIT 9: Package of Documents from  
13 Freedom Rally.2021.com website

14 BY MR. CHAMP:

15 215 Q. Now, that evening, Ms. Nagle, I'm  
16 aware that you didn't -- or we were told by  
17 Ms. Choujounian that after, you know, the speeches  
18 at the stage that you guys were on, you went back  
19 to the hotel, but Ms. Choujounian stayed, and she  
20 went to the Capitol building and was at the Capitol  
21 building; is that your understanding?

22 A. Whether she stayed or went back, I  
23 believe that, yeah, you heard her testimony. She  
24 was --

25 216 Q. Yes.

1 A. -- around there.

2 217 Q. Okay. And you heard her testimony  
3 too. You don't disagree with it; is that right?

4 A. Right.

5 218 Q. Okay. And so by that evening,  
6 though -- well, let's stay back. But by that  
7 morning, by noon, you realized, I'm sure, you were  
8 part of something much, much bigger than just a  
9 health summit; is that fair to say?

10 A. I think I was there on a day that  
11 was huge. I don't believe that, no, I was part of  
12 anything bigger than what I went there to do. I --  
13 I went there to be part of a health freedom stage  
14 and bring awareness, and that is what I did, and  
15 that's what I was a part of. It just so happened  
16 to fall on this day where there is significant  
17 events that followed.

18 219 Q. It was just a coincidence that it  
19 all happened on the same day?

20 A. For me?

21 220 Q. Yes. Do you think maybe for the  
22 Global Frontline Nurses who organized it, it wasn't  
23 a coincidence?

24 A. I think being American, they  
25 obviously had a lot more awareness of what was



1           happening, but I don't follow American politics nor  
2           do I barely follow Canadian politics.

3       221                   Q.    In your affidavit you say that  
4           when you travelled to Washington, you had no idea  
5           that there was going to be Trump-inspired protests  
6           in Washington, D.C. on January 6th; is that right?

7                   A.    Correct.

8       222                   Q.    You had no idea that Congress was  
9           going to be certifying the Electoral College vote  
10          naming Joseph Biden the president? You had no idea  
11          about that?

12                   A.    No. No. I didn't even know what  
13          MAGA was. I had to look into see what that meant.

14       223                   Q.    But just being around Washington,  
15          you didn't hear anyone talking about that, that  
16          today is the day that the Electoral College votes  
17          are going to be certified by the U.S. Congress?  
18          You didn't hear anything about that?

19                   A.    Well, and being there all day,  
20          obviously, eventually I kind of heard what was  
21          happening because I asked questions.

22       224                   Q.    Okay.

23                   A.    But I hadn't -- and even then, I  
24          didn't really quite understand what that all meant.

25       225                   Q.    Okay. By the evening, you were

1           aware that people had attacked the Capitol  
2           building?

3                           A.    I don't know if I'd use the word  
4           attack, but we were heading back to the hotel, and  
5           my husband called me to see if I was okay, and I  
6           didn't know what he was referring to. So from  
7           Canada, they had heard about it before I did --

8   226                   Q.    Yes.

9                           A.    -- and so he explained to me what  
10          was going on, and then we were already back at the  
11          hotel room and turned on the news.

12   227                  Q.    So your husband had seen some  
13          images on television that caused him to have  
14          concern for your safety?

15                        A.    Well, I wouldn't say concern for  
16          my safety, just -- just if we were okay or what was  
17          happening just in -- yeah, maybe a little bit.  
18          He's quite a guy. So and then when we were heading  
19          back to the hotel, I did hear a lot of police  
20          sirens and -- and commotion, but I didn't know what  
21          that was about.

22   228                  Q.    Okay. But when you got back to  
23          your hotel room, you were watching television. You  
24          saw some of the images of people, like, breaking  
25          windows and entering the Capitol building? You saw

1           those images?

2                           A.    The ones that were played on CNN,  
3           yes.

4    229                   Q.    Okay.  And but you wouldn't  
5           describe that as an attack on the building?

6                           A.    It just didn't add up to what we  
7           had seen or heard and spoke to people.  It -- I  
8           mean, obviously, breaking through windows and what  
9           they were showing, yes, that did look like an  
10          attack.

11   230                  Q.    Okay.  But you didn't trust the  
12          images that you were seeing on television; you  
13          thought maybe that the media couldn't be trusted on  
14          that?

15                        A.    Something seemed off.

16   231                  Q.    And what do you mean by that?  You  
17          don't think that people -- that those images are  
18          true?  It seemed like fake news in some way?

19                        A.    I -- I just felt that there was a  
20          whole side of the story missing, which seems to be  
21          most case [sic] with mainstream media that how the  
22          whole story is never produced.

23   232                  Q.    Okay.  By that evening of January  
24          6th, you had heard that a woman had died that day  
25          in the Capitol building?

1                   A.    I can't remember if we did that  
2                   day or the next day because we kind of turned off  
3                   the news, but, yes, eventually, I did hear about  
4                   this.

5    233               Q.    Well, and then the following day,  
6                   one of the -- one of the Capitol police also died  
7                   from injuries he sustained on January 6. Do you  
8                   recall hearing about that?

9                   A.    Yes.

10   234              Q.    Okay. And do you think that's  
11                   true that a Capitol Hill police officer died?

12                   A.    Well, that -- that's what was  
13                   reported.

14   235              Q.    Okay. Did you find those events,  
15                   like, the people attacking the Capitol Hill  
16                   building and then what happened there, did you find  
17                   the events disturbing?

18                   A.    I don't know what I thought about  
19                   it at the time. It was a little bit -- I don't  
20                   know -- surreal in a sense. I didn't really  
21                   understand what was happening or -- or why. And  
22                   then there just also seemed to be parts of the  
23                   stories missing, so I found it to be kind of rather  
24                   confusing.

25   236              Q.    M-hm. Yes, I think it seemed

1 surreal to many people watching from around the  
2 world and I think some of the members of Congress  
3 in that building that day.

4 Now, did you put out any kind of a  
5 statement expressing horror or disapproval about  
6 what had happened in Washington, D.C. that day?

7 A. I did not.

8 237 Q. And, in fact, you posted another  
9 video, did you not, on Instagram, on January 7th,  
10 where you interviewed two people in Washington  
11 while you were still there suggesting that what  
12 happened at the Capitol building wasn't that  
13 serious.

14 A. I -- I got their firsthand account  
15 of what they experienced.

16 238 Q. Okay. And their firsthand  
17 accounts, they told you that they -- like, it  
18 seemed -- actually, the whole thing seemed quite  
19 peaceful and that there might have been a few bad  
20 actors, but they didn't see it. And it otherwise  
21 seemed like a good event; does that summarize  
22 basically what they told you?

23 A. Yeah, that is basically what they  
24 had shared with me.

25 239 Q. And you chose to post that video

1 because you thought that, I guess, it fits with  
2 what you're telling us now is you thought there was  
3 more to the story, that it perhaps wasn't as  
4 serious as what the mainstream media was  
5 portraying; is that fair?

6 A. I felt like there was a whole side  
7 to the story missing, that there was obviously a  
8 lot of people that showed up in Washington that  
9 many may not have shared the same views or  
10 behaviour that was being portrayed in the -- the  
11 media, that was putting a general blanket statement  
12 out on -- on everyone. So I thought it was  
13 important to share another side of some of the  
14 individuals that were there that people were not  
15 seeing or hearing about.

16 240 Q. And that's fair, Ms. Nagle,  
17 because you -- obviously, you had zero intention of  
18 having anything to do with invading or attacking  
19 the Capitol building, correct?

20 A. Yeah, absolutely not.

21 241 Q. Absolutely not. And presumably,  
22 there was other people there that day who had no  
23 intention of doing something like that?

24 A. Yes. When we were waiting for  
25 our -- our cab to head back to the hotel room,

1           there was many people coming forward, and we  
2           started asking people what -- what was happening or  
3           why they were all -- like, it seemed to be this  
4           huge exodus of people leaving. And they kind of  
5           vaguely told us, because they were all trying to  
6           get their own way home, what was -- what was going  
7           on, so many -- many were leaving and not approving  
8           of what was happening.

9       242                   Q.     Right. But do you think that  
10           there's any chance that the people who did attack  
11           the Capitol building, they were -- they were  
12           inspired a bit by all the different protests that  
13           you all had -- that they attended that day?

14                   A.     I -- I don't -- I'm not going to  
15           speak to why people did what they did. I mean, we  
16           talked about health and our body and vitamins, so I  
17           don't see how that would inspire people to attack a  
18           building, nor do I believe that people -- I still  
19           don't like the word attack. I don't believe a lot  
20           of people were there to do that having over the  
21           year and a bit, meeting some individuals and  
22           hearing their side of the story. So I -- I think a  
23           lot of people were not there to take part in that.

24       243                   Q.     But some people where, though.  
25           Some people did attack the building, right? Or you

1 don't necessarily believe that either?

2 A. I haven't -- I -- all I hear is  
3 reports, and these days, over the last two years, I  
4 take reports with a grain of salt until I have  
5 actual conversations.

6 244 Q. Right. Now, when you returned to  
7 Canada, there were a number of news stories talking  
8 about the fact that you had attended Washington,  
9 D.C. on that same day that there was this -- you  
10 don't like the word attack -- I'll say the invasion  
11 of the Capitol building. There was a bunch of news  
12 stories about that that you were there or in  
13 Washington on the same day?

14 A. Yes.

15 245 Q. Okay. And did some of those  
16 reporters contact you for comment?

17 A. Probably.

18 246 Q. Yes. But you didn't give any  
19 comment to the media because you don't trust the  
20 mainstream media; is that fair?

21 A. Yes.

22 247 Q. And once those stories came out,  
23 like, I'll just read some of the titles to some of  
24 the news stories. These are --

25 MR. CHAMP: Counsel, these are just all



1 the news stories that are Exhibit A to Mr. Horter's  
2 affidavit, CBC article, COVID -- or pardon me --  
3 CBC article: (as read).

4 "Regulator investigating two  
5 Ontario nurses who had travelled to  
6 D.C. rally promoting COVID fraud  
7 conspiracy; VICE News, COVID  
8 conspiracy nurses among those who  
9 spoke at Trump's violent D.C.  
10 rally; National Post, Ontario nurse  
11 fired after speaking at D.C. rally  
12 on day of Capitol storming."

13 You were aware that there were those kinds of  
14 stories out there about you, Ms. Nagle?

15 A. Yes.

16 248 Q. And did you ask any of those news  
17 organizations to change their stories or correct  
18 them?

19 A. I did not have legal counsel at  
20 that time.

21 249 Q. Okay. All right. So, Ms. Nagle,  
22 I want to ask you some questions. We'll move on to  
23 your employment with the London Health Sciences  
24 Centre. Now, you were terminated from your  
25 employment shortly after returning from Washington,

1 correct?

2 A. Correct.

3 250 Q. Okay. And we've got your letter  
4 of termination January 15th, 2021. Do you have a  
5 physical copy with you by any chance?

6 A. I -- not a physical copy, no.

7 251 Q. Or an electronic copy?

8 A. Sorry. I have the motion. It  
9 might take me a little bit to --

10 252 Q. It's okay. Just give me two  
11 seconds --

12 A. Okay.

13 253 Q. -- and I'll pop it up here. Okay.  
14 And the -- no, wrong one. Wrong one. There we go.  
15 Okay. I'd like this smaller. All right. Okay.  
16 I'm just going to share screen with you so you can  
17 see it. All right. You see that letter?

18 A. Yes. Well --

19 254 Q. Okay.

20 A. -- I have it, yes.

21 255 Q. Yeah. Sorry. I'll make it a  
22 little bit smaller so you can see it a bit better.  
23 So this is the full letter. It was a one-page  
24 letter from the London Health Sciences Service  
25 Centre January 15th, 2021. It's from Janet Mills,

1 the manager of Children's Care. This was your  
2 letter of termination, correct?

3 A. Correct.

4 256 Q. Okay.

5 MR. CHAMP: Counsel, we'll mark that as  
6 the next exhibit to the cross-examination of  
7 Ms. Nagle.

8 EXHIBIT 10: London Health Sciences  
9 Service Centre January 15th, 2021, for  
10 Ms. Nagle

11 BY MR. CHAMP:

12 257 Q. Now, I'll just ask you a few  
13 questions about the content, Ms. Nagle. In the  
14 second paragraph, they say during the meeting with  
15 them -- you see right here: (as read)

16 "We discussed your conduct and  
17 active social media posts in which  
18 you promote antimasking and  
19 antidistancing in public forums."

20 So that's true; you were doing that? You were on  
21 social media talking about that masks aren't good  
22 or aren't healthy and same thing with social  
23 distancing, that that's not necessary and so forth?  
24 That's what you were doing, correct?

25 A. Yes, because they're harmful, and

1                   there's evidence to prove it.

2           258                   Q.    Okay.  And the next paragraph  
3           down:  (as read)

4                               "Kristen, your conduct, lack of  
5                               compliance, and blatant disregard  
6                               for public health directives is  
7                               extremely concerning."

8           So you were disregarding public health directives  
9           at that time, correct, like around masking and  
10          social distancing?

11                   A.    Well, because the public health  
12          directives were extremely concerning and causing  
13          complete harm and damage in our communities and  
14          population.

15          259                   Q.    Right.  So you disagreed with  
16          them, and you weren't following them?

17                   A.    Yes.

18          260                   Q.    And the fact you were, then, also  
19          publicly advocating for that position, that's the  
20          reason why the London Health Sciences Centre  
21          terminated you; is that right?

22                   A.    Yes, because I went against -- you  
23          can see their -- their standards for business  
24          conduct.

25          261                   Q.    Yes.

1 A. It has nothing to do with health,  
2 just business conduct.

3 262 Q. Did you grieve that termination,  
4 by the way?

5 A. I did with my union.

6 263 Q. And where is that matter at?

7 A. The union did not pursue it, so we  
8 are going to be taking another avenue. It is just  
9 still ongoing.

10 264 Q. Okay. There was a meeting. It  
11 says in the first paragraph here: (as read)

12 "This letter will summarize the  
13 meeting held on January 13th, 2021."  
14 So you had a meeting with HR and so forth at the  
15 hospital?

16 A. It was a virtual meeting.

17 265 Q. Virtual meeting, okay. And did  
18 they ask you questions at that time about your trip  
19 to Washington?

20 A. Oh, probably.

21 266 Q. It would have come up?

22 A. I would imagine so.

23 267 Q. And why do you say that you  
24 imagine so?

25 A. It was quite prevalent in the

1 media, and so that's what a lot of their questions  
2 would probably have to do with.

3 COURT REPORTER: I missed the last  
4 part, ma'am. I would say that's what a lot of  
5 the --

6 THE WITNESS: It was prevalent in the  
7 media, so I'm sure they would have questions  
8 regarding the media statements.

9 BY MR. CHAMP:

10 268 Q. Okay. About your trip to  
11 Washington?

12 A. Yes.

13 269 Q. And had these -- have you been  
14 aware prior to that that your employer was upset  
15 about your social media posts prior to this meeting  
16 on January 13th?

17 A. Social media posts? No. I've had  
18 conversations with Janet. She believes I'm  
19 entitled to my own opinion.

20 270 Q. So had you been suspended prior to  
21 that in any way by the hospital, your employment?

22 A. I was, yes.

23 271 Q. You were suspended. And why were  
24 you suspended?

25 A. That's a loaded question.

1       272                   Q.    What were the reasons they told  
2                            you that you were suspended?

3                            A.    They didn't believe I was  
4                            following proper PPE.

5       273                   Q.    Okay.  That means personal  
6                            protective equipment.  Like, you weren't -- they  
7                            were suggesting you weren't properly wearing a mask  
8                            at work or something?

9                            A.    Yes, which was untrue.

10      274                   Q.    And when were you suspended from  
11                           work from that approximately?  This is January  
12                           2021.  When were you suspended?

13                           A.    I think -- I'm not a hundred  
14                           percent because it's a while ago, but I believe it  
15                           was around the date of November 19th.

16      275                   Q.    Of 2020?

17                           A.    Yes.

18      276                   Q.    Okay.  And you were suspended with  
19                           pay or without pay?

20                           A.    Without.

21      277                   Q.    Okay.  And at that time, they said  
22                           it was because they were concerned that you weren't  
23                           properly wearing masks at work?

24                           A.    That was their statement, correct.

25      278                   Q.    And you disagree with that; you

1 felt that you were wearing masks properly at work?

2 A. Yes.

3 279 Q. And when you were suspended, did  
4 they express any concern to you as well that they  
5 had read social media posts that you were publicly  
6 saying that masking rules and so forth were harmful  
7 and were a bad idea?

8 A. No. When I spoke to my union rep  
9 who was representing me, she encouraged me that I  
10 was allowed to my own opinion, and she encourages  
11 dissenting voices, and it had nothing to do with  
12 kind of my outside-of-work behaviour --

13 280 Q. Okay.

14 A. -- or actions, I should say.

15 281 Q. Okay. But then in this  
16 termination letter, January 15th, they did  
17 terminate you for outside-of-work behaviour,  
18 correct?

19 A. They did.

20 282 Q. And when they met with you on  
21 January 13th, did that come as a surprise to you  
22 that they were raising these issues with you?

23 A. Not entirely, no.

24 283 Q. Okay. But the timing of them  
25 calling you in for a meeting, by January 13, 2021,



1           you had been posting stuff on social media for,  
2           like, several months, like, back to the previous  
3           summer almost, correct?

4                   A.    Yes.

5   284                   Q.   And January 13th is the first time  
6           they had a meeting with you to discuss it or in a  
7           disciplinary way?

8                   A.    To discuss why, like --

9   285                   Q.   Social media posts -- your --

10                   A.    -- my outside-of-work actions?

11   286                   Q.   Yes.

12                   A.    Yes.

13                   MR. CHAMP: I apologize, Madam  
14           Reporter. That was my fault for speaking over her.

15                   BY MR. CHAMP:

16   287                   Q.   Is it fair to say, Ms. Nagle,  
17           that -- and I think you've already indicated this,  
18           that your employer's decision to meet with you on  
19           January 13th was prompted by the fact that you were  
20           in Washington, D.C. speaking at that rally?

21                   A.    I -- I think prompted by more  
22           media attention that they had to address.

23   288                   Q.   Fair enough. So it was prompted  
24           by the news stories about you speaking in  
25           Washington, D.C.?

1 A. Yes.

2 289 Q. Okay. Have you worked as a nurse  
3 since that termination?

4 A. I have not, no.

5 290 Q. So you haven't actively worked as  
6 a nurse since November of 2020 when you were  
7 suspended by London Health Sciences, correct?

8 A. Yes.

9 291 Q. Have you applied for other nursing  
10 jobs since your termination?

11 A. Not at this time, but more  
12 specifically because I don't really want to be a  
13 part of a system that causes harm to the public and  
14 does not abide by ethics and actual science and  
15 evidence and health.

16 292 Q. Okay. So because of your own  
17 personal values and views, you don't want to work  
18 in the Ontario medical health system at this time?

19 A. It does not align with my values  
20 and beliefs. I'd rather actually provide health to  
21 people and actually help people, yes.

22 293 Q. Okay. Have you had any other  
23 employment since January 2021?

24 A. Yes. I became a stay-at-home mom  
25 and a home-school teacher to my boys.

1           294                           Q.     Awesome.

2                                   A.     Which is probably the best job I  
3     have had so far.

4           295                           Q.     Okay. I just want to ask you a  
5     couple questions on the Canadian Frontline Nurses.  
6     Sorry. I'm just going to stop the share here. I  
7     had already entered that as an exhibit.

8                                   Oh, right. Actually, I had one  
9     question about the CNO -- I apologize -- The  
10    College of Nurses of Ontario.

11                                  Mr. Dearden asked you a number of  
12    questions. I'm not going to get very far, but you  
13    did make one comment that you felt that the  
14    investigations -- or I forget which -- one of the  
15    investigations was prompted by news stories, and I  
16    think you said news stories including the Together  
17    News story; is that right?

18                                  A.     Yes.

19           296                           Q.     Okay. Does any of the materials  
20    that you've received from The College of Nurses  
21    refer to Together News in any way?

22                                  A.     No, not -- not by name. I believe  
23    the Quack-Quack-Quack article was referenced,  
24    though, but I will have to go back and -- and  
25    check. But it was the wording, a lot of the

1           wording that the CNA and Together News used was  
2           parroted by the public. So I'd say they -- it --  
3           it gave a lot of public sway. They are very --  
4           obviously, like, the CNA is very reputable and, you  
5           know, can definitely sway the -- the public  
6           opinion. And you could see in the wording of the  
7           reports that came in is that -- that's what was  
8           being parroted.

9           297                   Q.    Right. And the CNA statement that  
10           they put out about the September 2021 protests,  
11           that they were quoted in a number of articles,  
12           media articles, correct?

13                   A.    Yes, and I -- I think, because  
14           when I looked up the dates, that it also swayed the  
15           same statement across all nursing unions across the  
16           country, they parroted the exact same script that  
17           CNA used all across the country from the -- the  
18           nursing unions. And so that -- that obviously  
19           caused a lot of damage within colleagues. We  
20           received a lot of messages from nurses.

21           298                   Q.    Right. So -- but in the Together  
22           News column by Mr. Horter, that Quack-Quack [sic]  
23           article, he quotes the CNA statement, and that's  
24           part of the stuff that you say is defamatory  
25           because he's repeating what the CNA says, correct?

1 A. Yeah, that's one part of it.

2 299 Q. Yes. Yes. Obviously, there's  
3 other things in there that you've got concerns  
4 about, which we know, but the CNA statement was  
5 also quoted by other media organizations, correct?

6 A. Correct.

7 300 Q. But you're not suing any of those  
8 organizations, correct?

9 A. Correct. I believe they're even  
10 in our -- exhibits are in my affidavit --

11 301 Q. Yes.

12 A. -- as well, the articles I quoted,  
13 yes.

14 302 Q. That's right. That's right.  
15 That's right.

16 A. But I think I had mentioned before  
17 the reason we weren't is because they're a lot more  
18 careful in their wording saying reported and  
19 quoting others, where the Together News came out  
20 and stated more -- stated it like a -- like a fact,  
21 this is the truth.

22 303 Q. Sure. Okay. But just getting  
23 back to the CNO or College of Nurses, so some of  
24 the materials you've got refers to the CNA  
25 statement. So The College of Nurses, part of the

1 reason for their investigation was prompted at  
2 least in part, it sounds like, by the CNA  
3 statement; that's your evidence?

4 A. Yes.

5 304 Q. But is it fair to say that The  
6 College of Nurses isn't saying that they heard  
7 about the CNA statement because they read it in the  
8 Together News article? Like, no one was saying  
9 that, were they?

10 A. I don't believe so.

11 305 Q. Okay. Like it wasn't Together  
12 News, that article. That's not what brought it to  
13 The College of Nurses' attention, or they're not  
14 suggesting that's how it came to their attention,  
15 are they?

16 A. I don't believe so.

17 306 Q. Okay. And is it fair to say,  
18 Ms. Nagle, that, like, The College of Nurses isn't  
19 referring to the Together News article in any way  
20 in their materials against you; is that fair to  
21 say?

22 A. Yes, but they are referring to  
23 public -- written public statements that have come  
24 in, and I -- you can tell in the wording that the  
25 public is gathering their information from several

1 of these articles such as Together News where we  
2 were labeled racist Trump supporters, like, anti  
3 all these things, MAGA, that they put all these  
4 labels on us because of the way these articles were  
5 wording, so The College of Nurses uses, yeah, the  
6 public statements.

7 307 Q. Okay. A couple questions about  
8 Canadian Frontline Nurses: You'd answered many  
9 questions about that already from Mr. Dearden.

10 I just had one thing. Mr. Dearden had  
11 asked you about fund raising, and you had said  
12 something about that there was no GoFundMe fund  
13 raising going on at this time.

14 Does that mean that there is going to  
15 be a GoFundMe plan that you're putting together, a  
16 GoFundMe campaign right now for Canadian Frontline  
17 Nurses?

18 A. We are not putting anything  
19 together at this time, but I didn't want to close  
20 it off as not a possibility.

21 308 Q. Fair enough. Fair enough. So  
22 there's nothing planned. Okay. And no other type  
23 of fund-raising campaign is planned at this time?

24 A. Correct.

25 309 Q. All right. I just want to ask you

1 now about the September protests. You say that the  
2 CFN organized all the protests referred to at  
3 paragraph 17 of your affidavit, but you then  
4 corrected it just to add Kelowna as well as another  
5 one that you organized as well?

6 A. Yes.

7 310 Q. Okay. Oh, wait. I apologize.  
8 Before I get into the September one, first, I just  
9 want to close off one issue. I apologize for that.

10 You had spoken and answered some  
11 questions about some of the charges that you've  
12 faced for breaching public health restrictions, and  
13 there is one charge arising from April of 2021; was  
14 that correct?

15 R/F MR. BOISSONNEAU-LEHNER: I believe I've  
16 objected to these, but she can answer.  
17 So I object, but go ahead, Ms. Nagle.

18 THE WITNESS: I believe that was when  
19 counsel Dearden pulled up the April 26, 2021; is  
20 that the one you're referencing?

21 BY MR. DEARDEN:

22 311 Q. Yes, there's a reference to a  
23 charge that you were facing from April of 2021.  
24 And you indicated you couldn't recall where it was  
25 from?



1 A. Yes.

2 312 Q. Okay. You, in April of 2021, you  
3 attended a church service in Alymer, Ontario at the  
4 Church of God Restoration; is that right?

5 A. Yes, I did.

6 313 Q. And you went on to the pulpit with  
7 the pastor, Mr. Hilbrandt (phonetic); is that  
8 right?

9 A. Yes.

10 314 Q. And there was a large number of  
11 people in the church that day?

12 A. Yes.

13 315 Q. And it was in breach of public  
14 health restrictions in Ontario at that time?

15 A. Yes, but also within our rights to  
16 religious ceremony and worship.

17 316 Q. Right. And a number of people  
18 were charged from that service. You were aware of  
19 that?

20 A. For attending, yes.

21 317 Q. Were you among those people who  
22 were charged for being at that service?

23 A. I was given a summons.

24 318 Q. Okay. There was other people  
25 there as well, Derek Sloan and Randy Hillier, those

1 politicians; you knew they were there as well?

2 A. Yes.

3 319 Q. Yes. Okay. Sorry about that. I  
4 just wanted to cover that off. September 1st,  
5 hospital protests, there's the cities at paragraph  
6 17 of your affidavit. In addition to that, you  
7 referred to Kelowna. What about Cornwall? I don't  
8 see Cornwall on your list, but Canadian Frontline  
9 Nurses, or you have indicated that organized --  
10 that Canadian Frontline Nurses also organized  
11 protests in Cornwall as well; is that right?

12 A. We did not organize that one.  
13 There was a few people that, I guess, were inspired  
14 and -- and joined in and organized their own event.

15 320 Q. Okay. I had found an interview  
16 with you with an entity called Bright Light News  
17 from August 31st, 2021. Do you remember being  
18 interviewed by Bright Light News?

19 A. Yes.

20 321 Q. Okay. And because that's not  
21 mainstream media, you were comfortable being  
22 interviewed by them; is that right?

23 A. Yes.

24 322 Q. And in that interview, you told  
25 Bright Light News and their listeners that Canadian

1 Frontline Nurses has put out a call for all of  
2 Canada to stand up at various hospitals across the  
3 country; does that sound right?

4 A. Yeah, I think so, meaning, like,  
5 the ones that we had listed.

6 323 Q. Well, you'd also mentioned that it  
7 was becoming a global event now, and across Canada,  
8 there was different hospital in areas were coming  
9 out as well making their own protests and saying  
10 they were going to stand with you; is that right?

11 A. Yes. Like I said, they started  
12 organizing their own events.

13 324 Q. Right. So you were aware that  
14 there was a number of people who then decided  
15 organize events on September 1st as well?

16 A. Yes.

17 325 Q. Following the call by Canadian  
18 Frontline Nurses to hold protests on September the  
19 1st, right?

20 A. Yes.

21 326 Q. And Cornwall was another one.

22 A. Yes, I think so.

23 327 Q. And Nanaimo, were you aware of the  
24 Nanaimo protest before September 1st, that they  
25 were planning one there?

1 A. I don't remember if I was aware of  
2 it before or after through social media posts, but  
3 I -- I -- obviously, I did become aware of it.

4 328 Q. Right. Well, the Cornwall one you  
5 learned before September 1st. I was just  
6 wondering. So --

7 A. I had a -- I have a -- like, a  
8 contact because we spoke in Cornwall, so I -- I had  
9 a contact and --

10 329 Q. Okay.

11 A. -- and she had reached out to me  
12 telling me that they were organizing it, so, yes, I  
13 did know of the Cornwall event.

14 330 Q. Any --

15 A. I don't have any contacts in  
16 Nanaimo.

17 331 Q. And what -- but the Cornwall  
18 wasn't an official Canadian Frontline Nurses event?  
19 Is that what you're telling us?

20 A. Yes. Yes.

21 332 Q. Okay. And what made it not a  
22 formal Canadian Frontline Nurses event?

23 A. It wasn't one of the city's listed  
24 on the poster that we had organized or that I spoke  
25 to directly to organize and to make sure that

1 protocols and procedures were in place.

2 333 Q. Yes.

3 A. And we tried to have a nurse --  
4 Canadian Frontline Nurse representative on each  
5 site. It doesn't always work out, but the vast  
6 majority of them, we did.

7 334 Q. So the Victoria, B.C., that,  
8 hospital, who was the Canadian Frontline nurse  
9 there?

10 A. That was one of them where we --  
11 we didn't have a nurse on site. We did have a  
12 doctor, though.

13 335 Q. Okay. Vancouver, we know about.  
14 How about Kamloops?

15 A. Kamloops was organized by a nurse.

16 336 Q. Who was associated with Canadian  
17 Frontline Nurses?

18 A. Yes.

19 337 Q. Do you recall who she -- or who he  
20 or she was?

21 A. Yeah, Glen. He's in the media.

22 338 Q. Right. How about the Calgary  
23 Foothills Medical Centre?

24 A. Yes, we had two nurses working on  
25 the Alberta, the Edmonton, and Calgary sites with

1 other organizers.

2 339 Q. And who were those two nurses?

3 A. Annette, she was an LPN, which is  
4 like an RPN, and the other one's name was Sarah.

5 340 Q. What about Saskatoon?

6 A. Saskatoon, we had a doctor and no  
7 official nurse at that site, but two other  
8 organizers.

9 341 Q. Yes. You talk about partners who  
10 helped Canadian Frontline Nurses organize these  
11 protests. When you say partners, do you mean  
12 individuals or other organizations?

13 A. Both.

14 342 Q. Okay. Who were some of the  
15 partners who helped Canadian Frontline Nurses  
16 organize these events?

17 A. Like, the individuals or, like,  
18 some of the organizations?

19 343 Q. How about some of the  
20 organizations?

21 A. Like, was it -- the problem is I  
22 don't remember all their names. We have our  
23 organizations that support us, like Vaccine Choice  
24 Canada, Police on Guard for Thee, Canada Health  
25 Alliance. There's the -- I want to say World

1 Freedom Rally. I believe that was the Vancouver  
2 one; up north was the Northern Alliance Group. And  
3 some of them was independent journalists, and I  
4 just don't remember all the names. I just remember  
5 the individuals mostly.

6 344 Q. At paragraph 18 of your affidavit,  
7 you say that: (as read)

8 "The protest sites were  
9 determined by me in coordination  
10 with regional representatives to  
11 ensure that the locations selected  
12 were safe for a peaceful protest and  
13 could be carried out in a manner  
14 that would not impede access to the  
15 hospitals."

16 So you were one of the main people deciding on the  
17 sites; is that right?

18 A. Yes.

19 345 Q. Okay. And how did you determine  
20 if a location was not safe?

21 A. Well, for example, in Victoria, we  
22 had it at the Royal -- I forget exactly what it's  
23 called -- Royal something hospital in Victoria.  
24 And when I spoke about to the organizer, she said  
25 that location will not work. There isn't a great

1 space. There's nowhere to park, and it'd all be  
2 hospital property, and it would become unsafe for  
3 protesters and hospital access. So they moved it  
4 completely away from the hospital, and they moved  
5 it to -- I want to say -- the legislature in  
6 Victoria.

7 346 Q. On September -- for the September  
8 1st?

9 A. Yes.

10 347 Q. How about any other locations that  
11 you rejected as not being safe?

12 A. I -- I don't remember if September  
13 1st there was any others, and I just don't  
14 remember. I know that September 13th, a lot of  
15 them changed, and a lot of them moved away from  
16 hospitals.

17 348 Q. Okay. Now, you're aware,  
18 Ms. Nagle, that after the September 1st protests,  
19 it was widely reported in mainstream media that  
20 there were many unpleasant events or incidents at  
21 those protests, news reports about patients and  
22 medical staff being impeded in entering or exiting  
23 the hospitals; you -- also receiving insults and so  
24 forth. You were familiar with those news stories?

25 A. I was familiar with those news



1 stories, yes.

2 349 Q. I'll just read out a couple of  
3 them.

4 MR. CHAMP: And, counsel, these are  
5 from Exhibit A of Mr. Horter's affidavit.

6 BY MR. CHAMP:

7 350 Q. There's the National Post article  
8 where it said: (as read)

9 "News reports from across the  
10 country detailed verbal and physical  
11 abuse from protesters during the  
12 last major round of protests  
13 including reports of ambulances and  
14 patients struggle to get through  
15 thousands of demonstrators to get to  
16 hospital."

17 CBC article: (as read)

18 "Reports of assault, verbal  
19 abuse as thousands protest vaccine  
20 passports outside hospitals across  
21 B.C."

22 And then of course: The antivaccine protestor spat  
23 at Nanaimo nurse, RCMP say. One of the CBC  
24 articles, there's a quote from a Toronto emergency  
25 nurse named Vikki Leung saying there's been

1 harassment and bullying at the hospital of staff.  
2 So you were aware generally of those news stories  
3 that they were reporting in a negative way about  
4 the protests?

5 A. It was very negative across the  
6 country, and I found it, in fact, rather  
7 interesting that it was the same script. Literally  
8 across the whole country at every location was the  
9 exact same script used.

10 351 Q. All those different news entities,  
11 National Post and CBC, are working together on  
12 their news story; is that what you're suggesting?

13 A. I'm just saying it was very  
14 interesting that it was all the same across the  
15 country at every single location.

16 352 Q. Okay. You didn't give any  
17 comments to any of those news organizations,  
18 correct?

19 A. I tried to give one to CBC, and  
20 they did not use it.

21 353 Q. Who was the reporter that you  
22 spoke to?

23 A. I have it in email. I'm not sure  
24 of the name at this time.

25 354 Q. Did you ask any of those media

1 organizations to correct their stories?

2 A. I'm not sure. There was --  
3 because there was talks of others, but I -- I'd --  
4 I'm not sure. I'm sorry.

5 355 Q. And just to be clear, Ms. Nagle,  
6 you were at the protest in London Ontario, correct?

7 A. Yes, I was.

8 356 Q. And so you can't speak firsthand  
9 about what was happening at the protests at all the  
10 other locations, correct?

11 A. Not firsthand, but I made sure to  
12 contact all the organizers and those that I knew  
13 attended, and I got their account of what happened  
14 across the country.

15 357 Q. Afterwards?

16 A. Yes.

17 358 Q. And how did they share those  
18 accounts to you?

19 A. Phone call or through text or  
20 Signal.

21 359 Q. And all of them were saying, there  
22 was no violence. There was no -- or not violence.  
23 I shouldn't say that. There was no patients being  
24 harassed. There was no medical staff being  
25 harassed. There was no one being blocked or

1           impeded. And all of it's fake news. That's what  
2           all of them were telling you?

3                   A. Yeah, that it was incredibly  
4           uplifting, positive, empowering, and a very  
5           beautiful, amazing day. The only mix that I got  
6           was from Kelowna, and they said that some of the --  
7           the signage that -- that came out in -- in Kelowna  
8           kind of lost a little bit of the messaging and --  
9           and did confuse the -- some of the messaging was  
10          lost a little bit in Kelowna.

11                   But they did say it was still a  
12          beautiful, peaceful day, and there was no harm,  
13          assaults, or any blockage of ambulance or -- or  
14          care. But that was the only one where I heard that  
15          there was some confusion -- confusing of the  
16          messaging.

17   360           Q. You tried to coordinate the  
18          messaging between the protests that you were  
19          involved with; is that right?

20                   A. We tried to make sure the  
21          messaging was the same all across Canada, yes.

22   361           Q. So were you sending out, like,  
23          talking points or scripting points to the different  
24          people?

25                   A. Yes. We sent out, yeah, different

1 ideas, signs, just different ideas to -- to go off  
2 of. Like, we were -- you know, we are here to  
3 support the nurses. We are here to support  
4 healthcare workers. We are here for health  
5 freedom. We are here for medical choice, informed  
6 consent. We are against coercion. We are against  
7 mandatory treatments that override the autonomy of  
8 or our body, that we should have choice. So that  
9 was kind of what the day was -- was about in -- in  
10 solidarity with our fellow healthcare workers.

11 362 Q. And there were also signs that  
12 were sent to all the different locations, correct,  
13 that were the same?

14 A. Oh, like, you mean the posters,  
15 like the advertising?

16 363 Q. Yes. Yes.

17 A. Yes.

18 364 Q. No. Well, big signs, like, for  
19 people at the protest to explain Frontline Nurse --

20 A. No.

21 365 Q. You didn't coordinate any signs  
22 between locations?

23 A. No.

24 366 Q. There were even national political  
25 leaders -- well, municipal and provincial leaders

1 spoke about these protests, correct?

2 A. Yes.

3 367 Q. You're aware that there was  
4 premiers, mayors, even not only Prime Minister  
5 Trudeau, but the leader of the conservative party,  
6 leader of the NDP party spoke out about those  
7 protests?

8 A. Yes, and interesting that they,  
9 you know, didn't speak out against the other  
10 hospital protests that take place especially, then  
11 Alberta that was pro-all restrictions, but that  
12 messaging is allowed.

13 368 Q. Turning then to the Nanaimo  
14 hospital, so you saw this news story at the time  
15 about that a nurse had been spat on at the protest  
16 at Nanaimo hospital?

17 A. I did.

18 369 Q. Okay. And you heard about that in  
19 September of 2021?

20 A. Yes.

21 370 Q. And beyond the news article, did  
22 you hear any other information about it? Did you  
23 contact anyone in B.C. to see if they could find  
24 out more about what happened at that protest or  
25 anything like that?

1 A. I did, and I came up with nothing.

2 371 Q. And who did you speak to?

3 A. Just several contacts that I have  
4 on Vancouver Island.

5 372 Q. And what did those people tell  
6 you? That they weren't there, or they didn't think  
7 it was true? Or what did they tell you?

8 A. Both.

9 373 Q. So you spoke to some people who  
10 were there and told you it wasn't true?

11 A. Yes.

12 374 Q. So you did have some contacts with  
13 some people who were at the Nanaimo protest?

14 A. I -- no. Let me rephrase that,  
15 and I apologize. I have people in, let's say,  
16 Victoria that could reach out to some in Nanaimo,  
17 or people that knew of people possibly there. So I  
18 did not get a firsthand account of anything that  
19 happened in Nanaimo. But I didn't hear of anything  
20 that -- it came up either they weren't there, or  
21 they didn't hear of that event happening.

22 375 Q. But you spoke to some people who  
23 knew people who were at the Nanaimo protest?

24 A. Yes.

25 376 Q. And they told you that they didn't

1 hear about an event like that happening?

2 A. Correct.

3 377 Q. Does that mean you don't believe  
4 that it happened?

5 A. I wouldn't say no. I just -- I do  
6 have a hard time believing that it happened, but  
7 I'm not here to deny it because I was not there,  
8 but I do have a hard time believing that that would  
9 happen.

10 And I'm not here to know the full  
11 context of the situation because I have personally  
12 seen the other side attack, and I just -- and what  
13 that can look like in other instances, so I'm -- I  
14 don't know. I don't -- it -- I have a hard time  
15 believing that that happened.

16 378 Q. Okay. I believe I'm just about  
17 done. I'm just going to be a moment, Ms. Nagle.

18 MR. CHAMP: I'm just going to go off  
19 mute here. I apologize, Madam Reporter. You can  
20 go off record. I'll just be, like, two minutes or  
21 a minute and a half maybe. Just hold on.

22 (DISCUSSION OFF THE RECORD)

23 BY MR. CHAMP:

24 379 Q. Okay. So, Ms. Nagle, for the  
25 September 1st protest, the Canadian Frontline



1 Nurses wanted those protests to be as big as  
2 possible, correct?

3 A. We wanted large numbers to come  
4 out, yes.

5 380 Q. And you wanted them as widely as  
6 possible across Canada, correct?

7 A. Yes.

8 381 Q. And is it fair to say that -- and  
9 I think you've already indicated this, that your  
10 callout for protests on that date inspired other  
11 protests that day?

12 A. Yes.

13 382 Q. And with respect to the Nanaimo  
14 protest or any of the other protests that you  
15 weren't directly or specifically involved in  
16 organizing, did you or Canadian Frontline Nurses  
17 ever put out any statements distancing yourself  
18 from those protests?

19 A. I don't -- I don't think so, no.

20 383 Q. Okay.

21 MR. CHAMP: Thank you. Those are all  
22 the questions I have.

23 -- Whereupon the Examination concluded  
24 at 2:08 p.m.  
25

## REPORTER'S CERTIFICATE

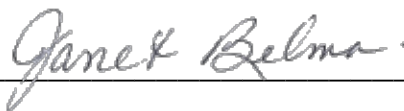
I, JANET BELMA, CSR, Certified  
Shorthand Reporter, certify;

That the foregoing proceedings were  
taken before me at the time and place therein set  
forth, at which time the witness was put under  
oath;

That the testimony of the witness  
and all objections made at the time of the  
examination were recorded stenographically by me  
and were thereafter transcribed;

That the foregoing is a true and  
correct transcript of my shorthand notes so taken.

Dated this 27th day of July, 2022.

  
\_\_\_\_\_

NEESONS COURT REPORTING INC.

PER: JANET BELMA, CSR, B.Ed.

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Court File No.: CV-21-00673636-0000

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

**BETWEEN :**

CANADIAN FRONTLINE NURSES,  
SARAH CHOUJOUNIAN, KRISTEN NAGLE,  
and KRISTAL PITTER

Plaintiffs

– and –

CANADIAN NURSES ASSOCIATION,  
TIM GUEST, MICHAEL VILLENEUVE, TOGETHER NEWS INC.  
o/a COMOXVALLEY NEWS and o/a VANISLE NEWS,  
and JOHN DOE

Defendants

---

**NOTICE OF EXAMINATION**

---

TO: **KRISTEN NAGLE**

YOU ARE REQUIRED TO ATTEND on **Friday, July 22, 2022**, at 10 a.m. via videoconference, hosted at the offices of Neesons Reporting, 77 King Street West, Suite 2020, Toronto, ON, M5K 1A1, Tel: 416-413-7755, for:

☒ Cross-examination on your affidavit sworn July 14, 2022

☐ Examination for discovery

☐ Examination for discovery on behalf of or in place of [identify party]

[ ] Examination in aid of execution

[ ] Examination in aid of execution on behalf of or in place of [identify party]

If you object to the method of attendance, you must notify the other parties or their lawyers. If you and the other parties cannot come to an agreement on the method of attendance, one of the parties must request a case conference for the court to make an order under Rule 1.08(8).

YOU ARE REQUIRED TO BRING WITH YOU and produce at the examination the following documents and things,

All original documents including any correspondence, e-mails, text messages, Instagram messages, Facebook messages, WhatsApp group chat messages, Telegram messages, Tweets or other social media communications, and copies of the same in your possession or under your control or power:

1. relating to the termination of your employment with the London Health Sciences Centre – Children's Hospital of Western Ontario;
2. relating to any College of Nurses of Ontario investigations and proceedings involving your practice and conduct (such as CNO Case File #2020-CT-19984 and CNO Case File #2021-CR-26861), including any complaints about you and the confidential disclosure package referenced in paragraphs 16 and 17 of your affidavit sworn on July 14, 2022;

3. relating to any charges against you under the *Emergency Management and Civil Protection Act*, the *Reopening Ontario (A Flexible Response to COVID-19) Act* or any other Act;
4. relating to the Registered Nurses Association of Ontario's communications involving your conduct and practices;
5. relating to the organization, planning, notices of (e.g. digital flyers), and attendance at the rallies organized by you and/or Canadian Frontline Nurses on or before September 9, 2021.

Date: July 1J, 2022

**GOWLING WLG (CANADA) LLP**

Barristers & Solicitors  
1 First Canadian Place  
100 King Street West, Suite 1600  
Toronto ON M5X 1G5

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AND TO: **CHAMP & ASSOCIATES**  
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Lawyers for the Defendants, Together  
News Inc. and John Doe (aka William  
Horter)

Electronically filed / Déposé par voie électronique : 11-Aug-2022  
 Toronto Superior Court of Justice / Cour supérieure de justice  
**CANADIAN FRONTLINE NURSES et al.**  
**Plaintiffs**

503

-and-

Court File No./N° du dossier du greffe : CV-21-00673636-0000

**CANADIAN NURSES ASSOCIATION et al.**  
**Defendants**

Court File No. CV-21-00673636-0000

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
 PROCEEDING COMMENCED AT  
 TORONTO

---

**NOTICE OF EXAMINATION**

---

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Lawyers for the defendants, Canadian Nurses Association,  
 Tim Guest and Michael Villeneuve

**File Number: T1028668**



# Find a Nurse



## KRISTEN NAGLE

ENTITLED TO PRACTICE WITH NO RESTRICTIONS

ESSENTIAL INFO: Please read

- General
- Registration History
- Practice Information
- Employment Information

### Registered Nurse (RN)

Category	RN
Class	General
Registration Number	06278510
Registration Status	Current
Initial Registration with CNO	24-May-2006

### Former Names

First/Middle Name	Last Name
KRISTEN	HOLWELL

# Find a Nurse



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## KRISTEN NAGLE

### ENTITLED TO PRACTICE WITH NO RESTRICTIONS

**ESSENTIAL INFO:** [Please read](#)

General

Registration History

Practice Information

Employment Information

Registration history since 04 Jun, 2009

#### Registered Nurse (RN)

Category	Class	Status	From	To	Source
RN	General	Current	04-Jan-2007		

College of Nurses of Ontario  
101 Davenport Road Toronto, ON Canada M5R 3P1



Leading in regulatory excellence.  
Regulating nursing in the public interest.

THE STANDARD OF CARE.

# Find a Nurse



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## KRISTEN NAGLE

### ENTITLED TO PRACTICE WITH NO RESTRICTIONS

**ESSENTIAL INFO:** [Please read](#)

General

Registration History

Practice Information

Employment Information

#### Cautions What's this?

**DATE:** 06-Oct-2021**DETAILS:** The member was directed by the Inquiries, Complaints and Reports Committee (ICRC) to attend before the ICRC to be cautioned with respect to the following standards and educational tools:

- Professional Standards
- Code of Conduct
- Ethics
- Social Media: Reflect Before You Post

This Order of the ICRC is subject to a judicial review application.

#### Charges What's this?

**DATE:** 26-Apr-2021**DETAILS:** The member was charged in Ontario with the following:

- failing to comply with a continued order originally made under subsection 7.0.2 of the Emergency Management and Civil Protection Act, contrary to Section 10(1)(a) of the Reopening Ontario (A Flexible Response to COVID-19) Act.

## Charges [What's this?](#)

**DATE:** 26-Apr-2021

**DETAILS:** The member was charged in Ontario with the following:

- failing to comply with a continued order originally made under subsection 7.0.2 of the Emergency Management and Civil Protection Act, contrary to Section 10(1)(a) of the Reopening Ontario (A Flexible Response to COVID-19) Act.

**DATE:** 22-Nov-2020

**DETAILS:** The member was charged in Ontario with the following:

- failing to comply with a continued order originally made under subsection 7.0.2 of the Emergency Management and Civil Protection Act during the COVID-19 Emergency, specifically, O. Reg 364/20, contrary to Section 10(1)(a) of the Reopening Ontario (A Flexible Response to COVID-19) Act; and
- hosting a public event at a prescribed premises where the number of people in attendance exceeded the number permitted under a continued order made under subsection 7.0.2 of the Emergency Management and Civil Protection Act, contrary to Section 10.1(1) of the Reopening Ontario (A Flexible Response to COVID-19) Act.

## Remedial Activities [What's this?](#)

**DATE:** 06-Oct-2021

**DETAILS:** The member was directed by the Inquiries, Complaints and Reports Committee (ICRC) to complete remedial activities with respect to the following standards and educational tools:

- Professional Standards
- Code of Conduct
- Ethics
- Social Media: Reflect Before You Post

This Order of the ICRC is subject to a judicial review application.

## Find a Nurse



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## KRISTEN NAGLE

ENTITLED TO PRACTICE WITH NO RESTRICTIONS**ESSENTIAL INFO:** [Please read](#)

General

Registration History

Practice Information

Employment Information

The content is based on information the nurse or nurse's employer reports to CNO. The employment contact information may be nursing or non-nursing.

**RN EMPLOYMENT****London Health Sciences Centre - Children's Hospital of Western Ontario**

800 COMMISSIONERS RD E

LONDON, ON

N6A 4G5

CANADA

+1 (519) 685-8500

**Start Date**

2012

**End Date**

2021

**Canadian School of Natural Nutrition - London**

108-747 Hyde Park Rd

London, ON

N6H 3S3

Canada

519-936-1610

**Start Date**

2020

**End Date**

2020

Court File No.

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
**(DIVISIONAL COURT)**

BETWEEN:

**KRISTEN NAGLE**

Applicant

-and-

**COLLEGE OF NURSES OF ONTARIO**

Respondent

**NOTICE OF APPLICATION TO DIVISIONAL COURT FOR JUDICIAL REVIEW****TO THE RESPONDENT**

A LEGAL PROCEEDING HAS BEEN COMMENCED by the applicant. The claim made by the applicant appears on the following page.

THIS APPLICATION for judicial review will come on for a hearing before the Divisional Court on a date to be fixed by the registrar by the method of hearing requested by the applicant, unless the court orders otherwise. The applicant requests that this application be heard (*choose one of the following*)

- ☐ In person
- ☐ By telephone conference
- ☒ By video conference

at the following location, Osgoode Hall, 130 Queen Street West, Toronto, Ontario M5H 2N5.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the Rules of Civil Procedure, serve it on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in the office of the Divisional Court, and you or your lawyer must appear at the hearing.

IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in the office of the Divisional Court within thirty days after service on you of the applicant's application record, or at least four days before the hearing, whichever is earlier.

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IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN TO THE APPLICANT IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

March 25, 2022

Issued by \_\_\_\_\_

Local Registrar  
Osgoode Hall  
130 Queen Street West  
Toronto, ON  
M5H 2N5

TO: **College of Nurses of Ontario**  
Inquiries, Complaints and Reports Committee  
101 Davenport Road  
Toronto, ON M5R 3P1

**c/o Alison Gorham, Team Lead, ICRC Professional Conduct**  
Tel: (416) 963-3807  
Email: [agorham@cnomail.org](mailto:agorham@cnomail.org)

AND TO: **PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**  
155 Wellington Street West, 35<sup>th</sup> Floor  
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M5V 3H1

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Lawyers for the Respondent

- 3 -

AND TO **The Attorney General of Ontario**  
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Toronto, Ontario M5G 2K1  
Email: clbsupport@ontario.ca

AND TO **The Attorney General of Canada**  
120 Adelaide Street West  
Suite 400  
Toronto, Ontario M5H 1T1  
Email: NCQ-AQC.Toronto@justice.gc.ca



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### APPLICATION FOR JUDICIAL REVIEW

1. The Applicant makes an application for:

- (a) an Order setting aside the decision of the Inquiries, Complaints, and Reports Committee of the College of Nurses of Ontario;
- (b) a declaration that the decision of the Inquiries, Complaints, and Reports Committee of the College of Nurses of Ontario infringes the Applicant's freedom of expression under section 2(b) of *The Canadian Charter of Rights and Freedoms* (the "Charter");
- (c) an Order under section 4(1) of the *Judicial Review Procedure Act* staying any proceeding against the Applicant commenced by the College of Nurses of Ontario, including the Inquiries, Complaints, and Reports Committee and the Discipline Committee proceeding;
- (d) an extension of time for the filing of the within application, if required;
- (e) a stay of all College of Nurses of Ontario proceedings against the Applicant pending the final determination of this application;
- (f) the costs of this application on the appropriate scale; and
- (g) such further and other relief as counsel may advise and that this Honourable Court deems just.

2. The grounds for the application are:

- (a) A panel of the Inquiries, Complaints and Reports Committee (the "ICRC Panel") of the College of Nurses of Ontario ("CNO") reviewed reports of investigations into the Applicant's nursing practices pursuant to section 79(a) of the *Health Professions Procedural Code*, which is Schedule 2 to the *Regulated Health Professions Act*, 1991, S.O. 1991, c. 18.

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- (b) On November 18, 2021, the ICRC Panel signed its decision made October 6, 2021 (the “Decision”). The Decision was allegedly sent to the Applicant and the Applicant’s former lawyer, but the Applicant did not receive same on November 18, 2021.
- (c) In the Decision, the ICRC Panel found that the Applicant “failed to maintain the profession's standards by making public statements on social media platforms, Facebook and Instagram, which were false, inaccurate, or seriously misleading with respect to the COVID-19 virus, vaccines, and/or pandemic response, and in which [she] identified [herself] as a Nurse Practitioner.”
- (d) In the Decision, the ICRC Panel stated:
- In reaching this decision, the committee has considered the potential impact of this decision on your right to freedom of expression, protected under s. 2(b) of the *Canadian Charter of Rights and Freedoms*. The committee has concluded that a remediation program and caution is a proportionate response to these concerns and conduct. The overriding objective of any order of this committee is to safeguard the public interest, which includes the standing and reputation of the profession. Certain of your comments are false and may seriously mislead the public with respect to a public health crisis, and/or may harm the public perception of nursing. The committee’s decision is primarily remedial, and will allow you to consider and reflect on the nature of the conduct, and ensure that it is not repeated in the future. The decision will further the public interest as it signals to you, the profession, and the public, your conduct is unacceptable and harms the public interest. The impact on your *Charter* rights is minimal, given the preventive, educational and remedial nature of this decision. In all, the committee’s view is that this decision balances CNO’s statutory objectives and the *Charter* rights and values which are engaged.
- (e) The Decision does not discuss the elements of a section 2(b) *Charter* breach nor does the ICRC Panel provide reasons on how it reached its decision by applying the required elements of a section 2(b) *Charter* analysis.
- (f) The ICRC Panel’s failure to discuss the elements of a section 2(b) *Charter* breach and its failure to provide reasons on how it reached its Decision by applying the required elements of a section 2(b) *Charter* analysis do not meet the standard required in the circumstances.

- 6 -

- (g) Once the ICRC Panel determined that the Decision infringes the Applicant's section 2(b) *Charter* rights, the ICRC Panel did not provide any reasons concerning a section 1 *Charter* analysis. Notably, section 1 of the *Charter* is not referenced at all in the Decision.
- (h) The reasons given by the ICRC Panel contain fundamental gaps and reveal that the Decision is based on an unreasonable chain of analysis, including the ICRC Panel's failure to address the section 1 analysis required after finding that the Applicant's section 2(b) rights are infringed by the Decision.
- (i) The reasons provided to the Applicant do not reflect the stakes. The Decision threatens the Applicant's liberty and rights under section 2(b) of the *Charter*. The ICRC Panel did not adequately explain how its decision can be squared with the infringement of the Applicant's *Charter* rights, and the Decision is inconsistent with the legislature's intention behind the *Charter* and the *Regulated Health Professions Act*.
- (j) The reasons for the Decision, including the lack of reasons pertaining to the infringement on the Applicant's *Charter* rights, do not support rationality internal to the reasoning process and the Decision is untenable in light of the relevant factual and legal constraints that bear on it.
- (k) The Decision does not exhibit the requisite degree of justification, intelligibility, and transparency and contain, *inter alia*, unfounded generalizations and logical fallacies.
- (l) The ICRC Panel ignored, failed to consider, or misapprehended the evidence in concluding that the Applicant failed to maintain the profession's standards by making public statements on a social media platform which were false, inaccurate, or seriously misleading with respect to the COVID-19 virus, vaccines, and/or pandemic response.

- 7 -

- (m) The ICRC Panel exceeded its jurisdiction by making findings of fact and making findings of professional misconduct.
- (n) The Decision, including the rationale and the outcome which it led are incorrect, or in the alternative, unreasonable.
- (o) There are apparent grounds for the relief sought and no substantial prejudice or hardship will result as a result of the delay in bringing this Application.
- (p) A temporary stay of all CNO proceedings against the Applicant pending the final determination of this application for judicial review of proceedings under section 4 of the *Judicial Review Procedure Act* is appropriate because:
- i. whether the Decision is an unjustified infringement of the Applicant's Charter rights and whether the Decision is unreasonable are serious issues to be determined;
  - ii. the Applicant will suffer irreparable harm if the stay is not granted because her *Charter* rights will be infringed and her reputation will be damaged; and
  - iii. the balance of convenience favours granting the stay.
- (q) The Applicant relies on the following legislation, rules, and regulations:
- i. *Canadian Charter of Rights and Freedoms*, Part I of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK)*, 1982, c 11, s 91(24);
  - ii. *Judicial Review Procedure Act*, RSO 1990, c. J. 1;
  - iii. *Statutory Powers Procedure Act*, R.S.O. 1990, c. S.22;

- 8 -

- iv. *Rules of Civil Procedure*, R.R.O 1990, Reg. 194;
- v. *Courts of Justice Act*, R.S.O 1990, c. C. 43; and
- vi. *Regulated Health Professions Act*, 1991, S.O. 1991, c. 18.

3. The following documentary evidence will be used at the hearing of the application:

- (a) the record of proceedings of the ICRC Panel;
- (b) the Affidavit of Kristen Nagle, to be sworn; and
- (c) such further and other materials as the Applicant may indicate, and this Honourable Court may allow.

March 25, 2022

**JOHNSTONE & COWLING LLP**  
441 Jarvis Street  
Toronto, Ontario  
M4Y 2G5

**Alexander Boissonneau-Lehner (#65814S)**  
Tel: (416) 546-2125  
Email: [alehner@johnstonecowling.com](mailto:alehner@johnstonecowling.com)

Lawyers for the Applicant

Electronically filed / Déposé par voie électronique : 11-Aug-2022  
Toronto Superior Court of Justice / Cour supérieure de justice

**Court File No./N° du dossier du greffe : CV-21-00673636-0000**



Our Nation's Capitol  
300 First St NE  
Washington, DC 20002



Bianca Gracia

President Latinos for Trump



Becky

La Trumpista



Gene Ho

Trump 2016 Photographer



Stephen Willeford

Good Guy with a Gun



Kelly SoRelle

Lawyers for Trump



Maurice Symonette

Blacks for Trump



CC Davis

Blexit



Josh Macias

Vets4Trump



RC Pittman

Boots on the Ground  
Bikers for Trump

Carla Spalding

Congressional Candidate



Alex Phillips

American Priorities



Michelle Terris

Jexit



Dran Reese



Keith &amp; Kenny Lee

MAGA DRAG



Jason Sullivan

Wizard of Twitter



FREEDOM RALLY

#1LoudVoice

latinosfortrump.us





# FREEDOM RALLY

The Global Frontline Nurses 9 am

**Wednesday, January 6 12 pm - 4pm**

#ILoudVoice



Del Bigtree



Dr. David Martin



Ty & Charlene Bollinger



Lori Martin Gregory



Clay Clark



Virginia Freedom Keepers



Kevin Jenkins



Pastor Greg Locke



Mikki Willis



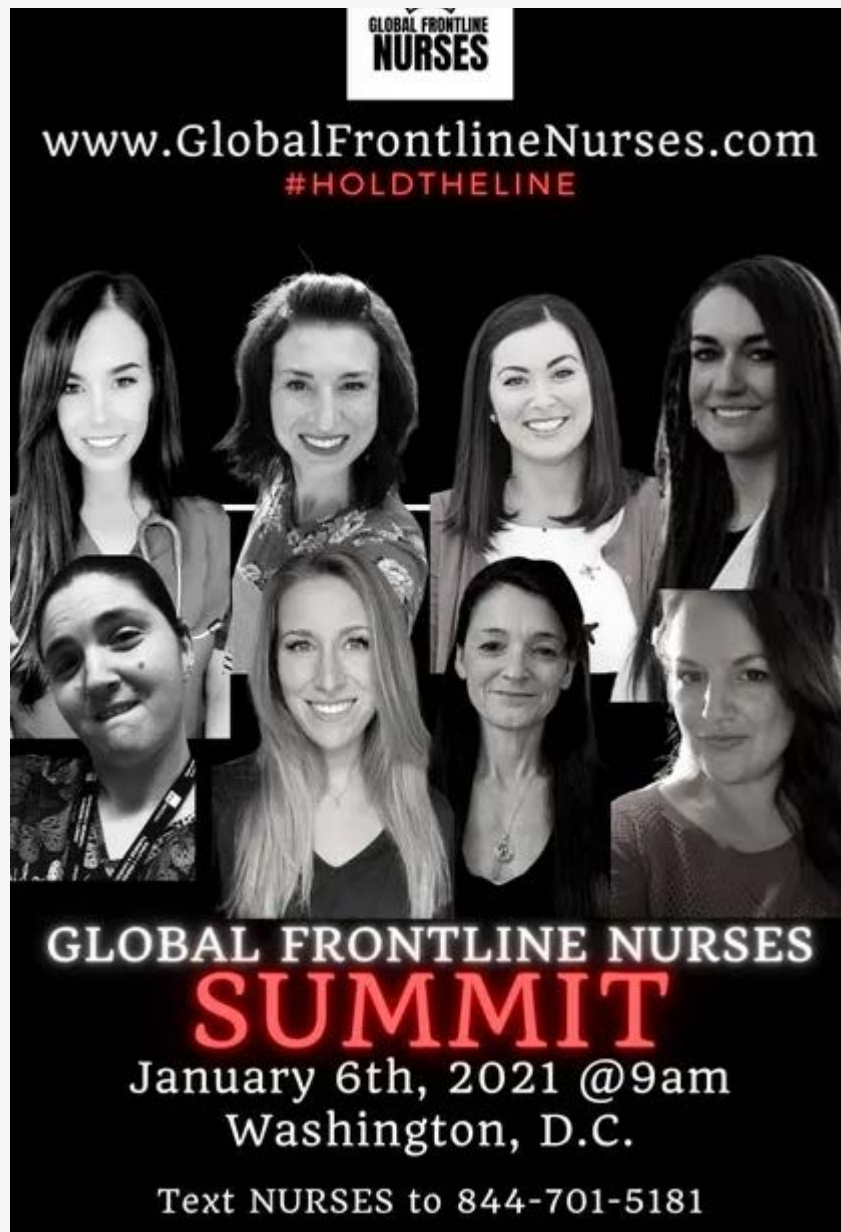
Mike Smith



Freedom Angels

**United States Capitol | 300 First St NE Washington D.C. 20002**

[freedomrally2021.com](https://freedomrally2021.com)



## SPEAKERS YOU DON'T WANT TO MISS!

Hear from Emmy Award-winning producer and investigative medical



Willis, the producer of the viral documentary *Plandemic*.

On January 6th we stand together to restore and defend our medical & health freedoms which are under attack by tyrannical state and federal agencies across the nation.

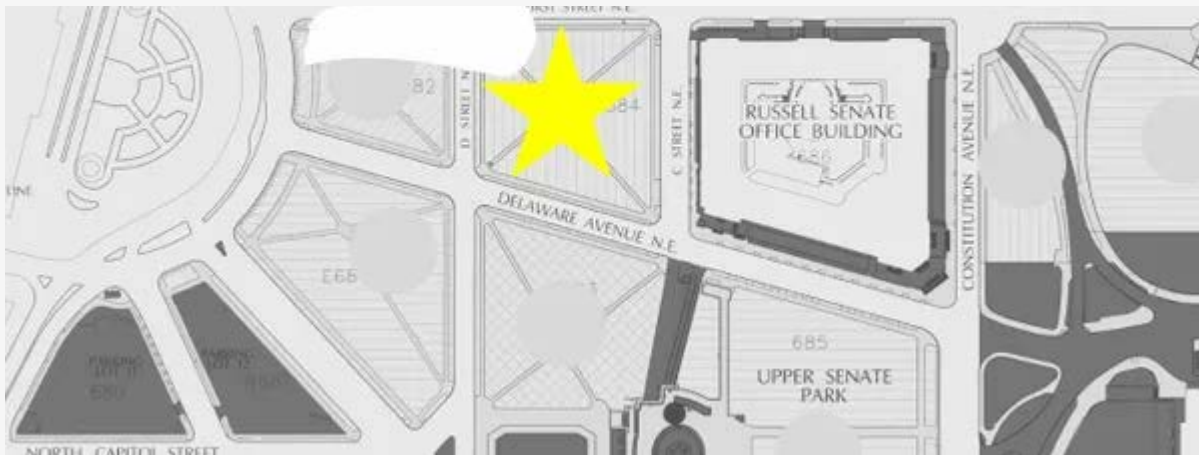
[Sign the petition](#) to preserve your right to accept, delay, or decline the COVID-19 vaccine, a product not even approved by the FDA.

You're Invited

Join us Wednesday, January 6 at the United States Capitol

for a gathering to celebrate America, freedom, health, and life with #1LoudVoice, as one nation, under God, indivisible, with liberty and justice for all!

Event Location



Join us for back-to-back rally events to hear compelling testimony  
& insight from dynamic leaders as they publicly address immediate  
& serious concerns related to liberty and freedom.

The Global Front-Line Nurses 9am - 10am

Freedom Speakers 10am - 12pm

Health Freedom Speakers 12pm - 4pm

## Support Health Freedom!

Help preserve health freedom. Your financial support will help  
us make this event and future legislative efforts a success!



DONATE NOW



7/26/22 11:53 AM

Electronically filed / Déposé par voie électronique : 11-Aug-2022  
Toronto Superior Court of Justice / Cour supérieure de justice



— Court File No./N° du dossier du greffe : CV-21-00673636-0000

**Court File No./N° du dossier du greffe : CV-21-00673636-0000**

BROUGHT TO YOU BY



VIRGINIA

*Freedom  
Keepers*

Virginia Freedom Keepers

[www.virginiafreedomkeepers.org](http://www.virginiafreedomkeepers.org)

Latinos For Trump

[www.latinosfortrump.us](http://www.latinosfortrump.us)

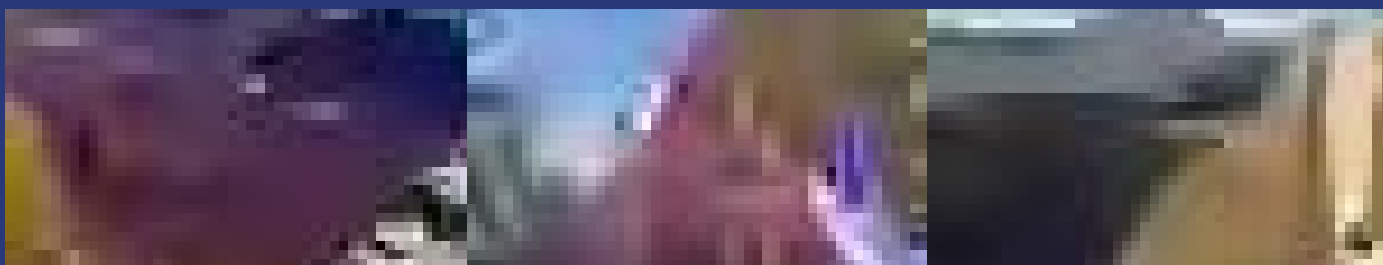


[www.medicalfreedompac.com](http://www.medicalfreedompac.com)

You're Invited

## Join us Wednesday, January 6 at the United States Capitol

A million Patriots are expected to gather on this historic occasion to celebrate America, freedom, health, and life with #1LoudVoice, as one nation, under God, indivisible, with liberty and justice for all!



## INFLUENTIAL LEADERS ADDRESS CRITICAL THREATS TO FREEDOM

Attend back-to-back rally events to hear compelling testimony & insight from featured guests as they publicly address immediate & serious





We must stand together to restore and defend such freedoms, the foundation of these being bodily sovereignty and health & medical freedoms.

Sign the petition to preserve your right to accept, delay, or decline the COVID-19 vaccine, a product not even approved by the FDA.



**PRESIDENTIAL REMARKS WILL BE  
LIVE STREAMED ON A JUMBO**





## FIND OUT MORE

United States Capitol | 300 First St NE Washington D.C. 20002

# FREEDOM RALLY

#ILoudVoice

**Wednesday, January 6 12 pm - 4pm**

							
Leigh Dundas	Del Bigtree	Dr. David Martin	George Papadopoulos	Roger Stone	Angela Stanton King	Dr. Cordie Williams	Marsha Lessard Christina Skaggs
							
Dr. Carrie Madej	Joey Gilbert	Kevin Jenkins	Pastor Greg Locke	Mikki Willis	Mike Smith	Clay Clark	Denise Aguilar Tara Thornton
							
Lori Martin Gregory							Ty & Charlene Bollinger

freedomrally2021.com



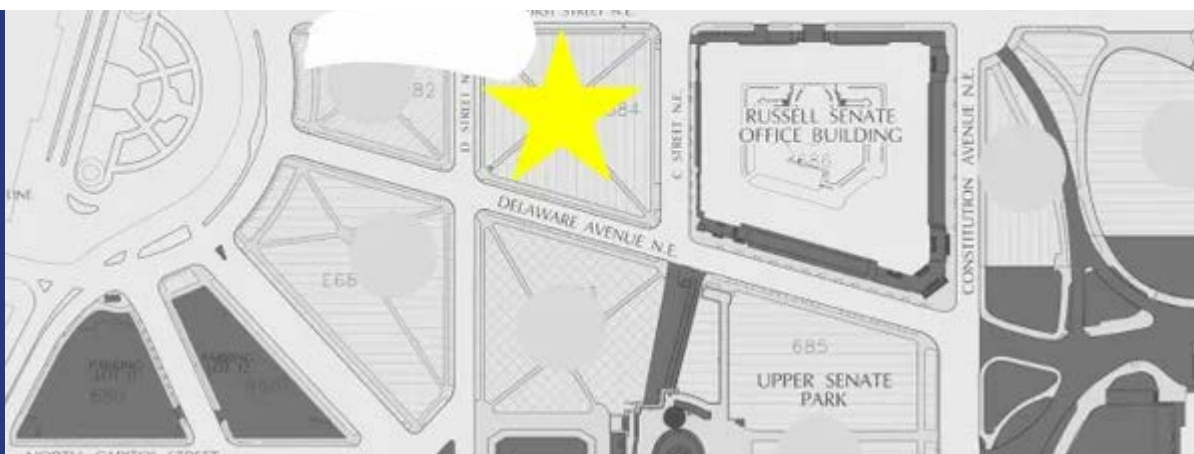
				
Bianca Gracia President Latinos for Trump	Becky La Trumpista	Gene Ho Trump 2016 Photographer	Stephen Willeford Good Guy with a Gun	Kelly SoRelle Lawyers for Trump
				
Maurice Symonette Blacks for Trump	CC Davis Blexit	Josh Macias Vets4Trump	RC Pittman Boots on the Ground Bikers for Trump	Carla Spalding Congressional Candidate
				
Alex Phillips American Priorities	Michelle Terris Jexit	Dran Reese	Keith & Kenny Lee MAGA DRAG	Jason Sullivan Wizard of Twitter



# FREEDOM RALLY

#1LoudVoice  
latinosfortrump.us

## Event Location



## 300 FIRST STREET NE, WASHINGTON DC 20002

The Global Front-Line Nurses 9am - 10am

Freedom Speakers 10am - 12pm

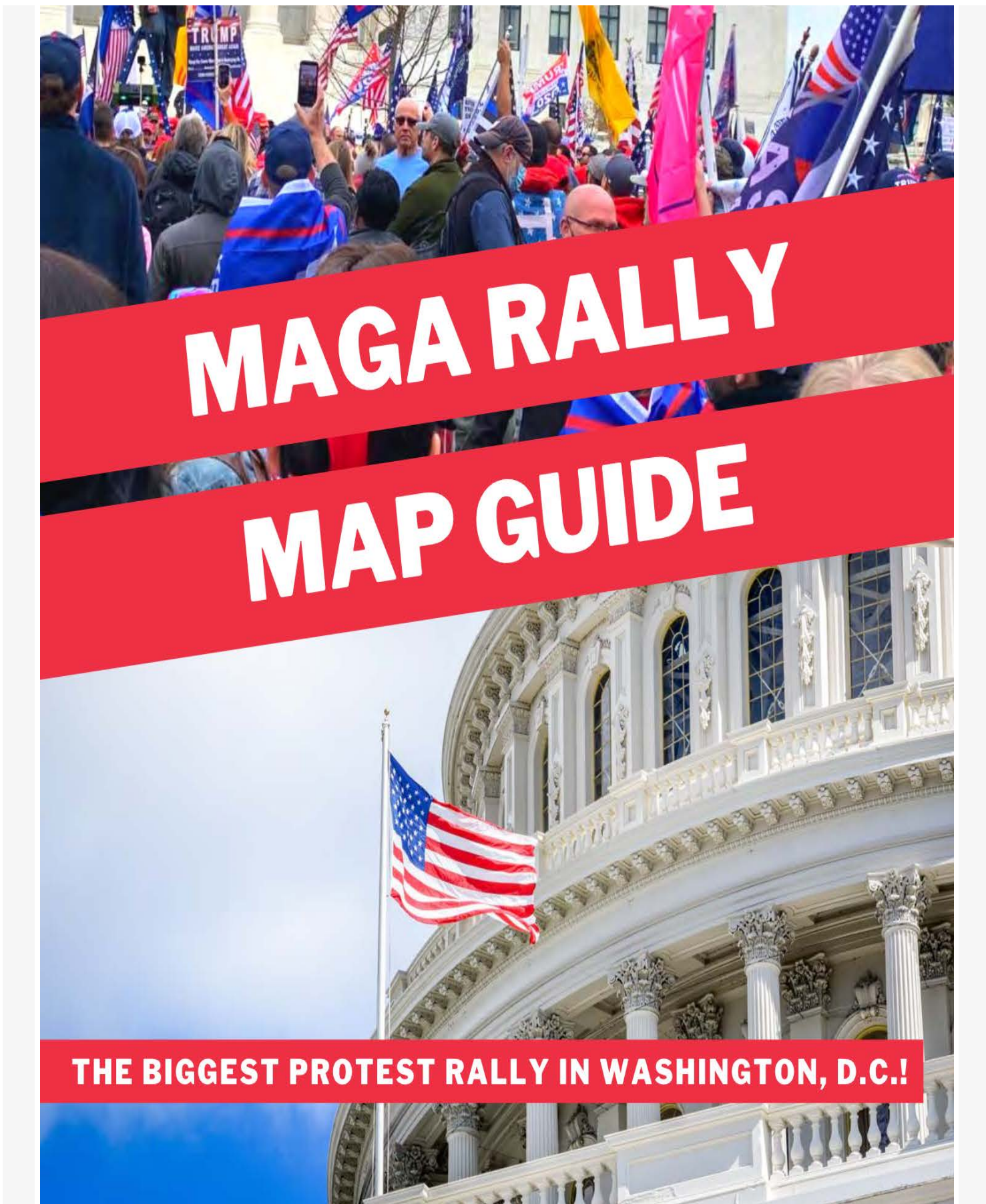
Health Freedom Speakers 12pm - 4pm

## JAN 5TH-6TH EVENT MAP & GUIDE

[bit.ly/magamapguide](https://bit.ly/magamapguide) ►









## Support FreedomRally 2021!

This event is made possible by the generous support of freedom loving patriots like you! Your financial support will help make this event & legislative efforts a success! All contributions will be applied toward event & operational costs.

Venmo @FreedomRally2021

 **DONATE NOW**



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# MAGA RALLY MAP GUIDE

**THE BIGGEST PROTEST RALLY IN WASHINGTON, D.C.!**

# Hello Patriots.

**I hope these maps help you navigate this week's D.C. events! After seeing so many different posts online I realized, "we need a map!" So I have assembled two maps for you, one for January 5th, 2021, and one for January 6th, 2021.**

**The information on each map comes from various social media posts I have seen shared. This is by no means every speaker and every event, which is why I have included the website links for the event hosts (that I know about) on the maps, in the PDF, and on the website.**

**Things change quickly! I encourage you to signup for updates at [bit.ly/magamapguide](https://bit.ly/magamapguide).**

## **Important notes:**

- I have been told by event organizers, there will be food trucks at the national mall**
- All national parks have public restrooms.**
- Bring small bills for vendors.**
- Remember to be a generous tipper. Let's bless the city of D.C. and its residents.**
- Leave the city better than how you found it. Please pick up any trash and garbage you come across.**

**See you soon patriots,  
Mercedes S.**

**For more information, visit [bit.ly/magamapguide](https://bit.ly/magamapguide)**



[bit.ly/magamapguide](https://bit.ly/magamapguide)

# MAGA RALLY MAP GUIDE

**MARCH TO SAVE AMERICA | 1:00 PM**

**PRAYER WALK**

**JERICO MARCH**

**11:45 AM - 2:00 PM**

- Supreme Court Blessing before the start of the Jericho March. | 11:45 AM
- Shofars blown, guided JERICO MARCH around Supreme Court | 12:00 PM
- Self-guided Prayer Vigil at the Russell Senate Office Building for Sen. Mitch McConnell | 1:30 PM @ 224 1st St. NE, Washington, DC
- Visits Sen. Mitch McConnell office calling on him to #DoNotCertify | 2:00 pm @ 317 Russell Senate Office Building)
- Event organizers Rob Weaver and Arina Grossu

**JERICHO MARCH.ORG**

**PRAYER WALK**

**3:00 PM - 4:00 PM**

Meet on the steps of the Lincoln Memorial at 3:00 pm for a brief corporate prayer, then join a group prayer walk around the Reflecting Pool. We will pray for safety during the rally, for our country and president, and for God's truth and justice to prevail at the congressional meeting.

**[BIT.LY/PRAYERWALKDC](https://bit.ly/prayerwalkdc)**

**MOMS FOR AMERICA | SAVE THE REPUBLIC RALLY**

**SAVE THE REPUBLIC RALLY**

**1:00 PM - 3:00 PM**

We the People must take to the US Capitol lawn and steps and tell Congress #DoNotCertify on #JAN6! Congress cannot certify this fraudulent Electoral College.

Located at the corner of Constitution Ave NE and First St NE. Across the street from the Supreme Court Building.

- Mike Lindell
- Ali Alexander
- Kim Klacik
- Kimberly Fletcher
- Jennifer Fleck
- Rose Tennwnt
- Debbie Kraulidis
- Juleen Jackson
- Dr. Rosemary Stein
- Namrata Carolan
- Annice Culp
- And More...

**MOMSFORAMERICA.US**

**ONE NATION UNDER GOD RALLY**

**ONE NATION UNDER GOD RALLY**

**2:00 PM - 5:00 PM**

Virginia Women For Trump invite you to this event intended to create the spiritual energy to touch the hearts of members of Congress and the Senate that they may become more aware of their great responsibility to preserve our Constitution the principles of our founding fathers and keep our country one nation under God. Located at the Supreme Court.

- Roger Stone
- Stephen Moore
- Joe Flynn
- Cheryl Chumley
- Alice Butler-Short
- Suzanne Monk
- Rob Weaver
- Arina Grossu
- And More!

**MARCH TO SAVE AMERICA  
FREEDOM PLAZA | 1:00PM**

**ROAD CLOSURE AREA**



**SCAN ME  
FOR LATEST**

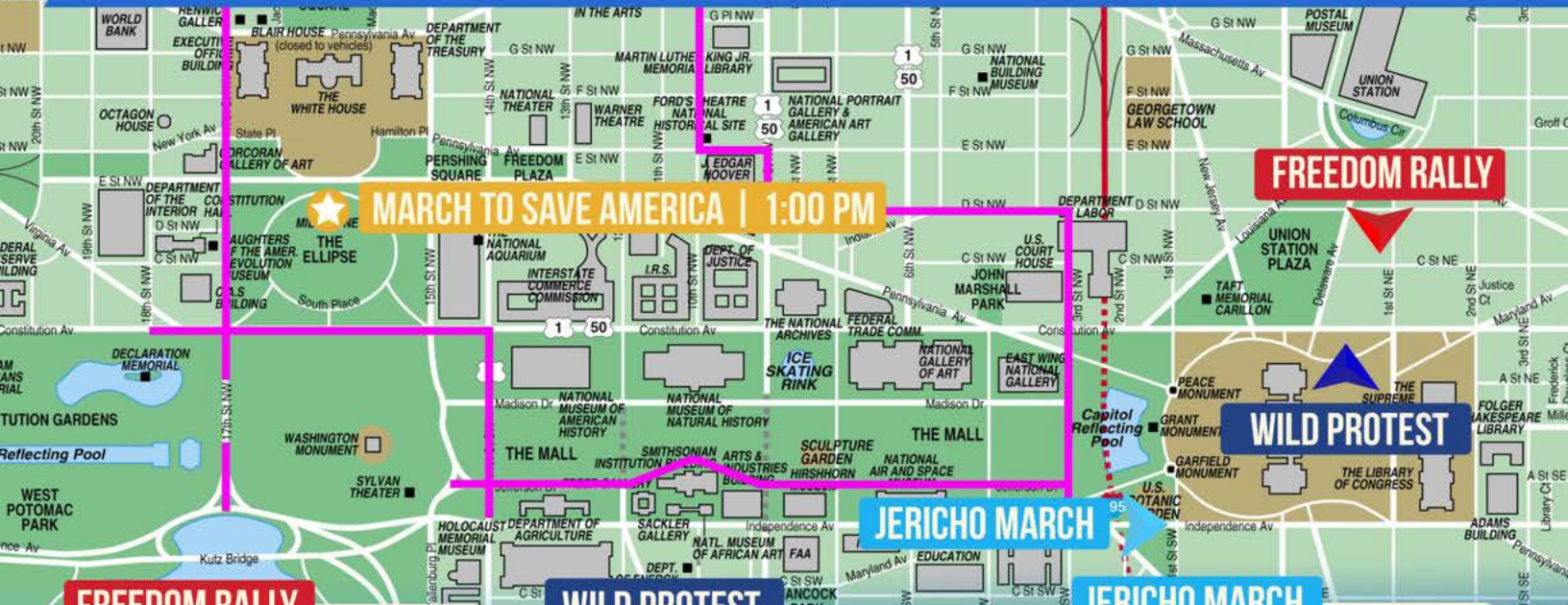
**#DONOTCERTIFY #JAN6 #STOPTHESTEAL #WILDPROTEST #1LOUDVOICE  
#HOLDTHELINE #GORIGHT #MARCHFORTRUMP #TAKEBACKAMERICA**

**FOLLOW  
SADIES**



[bit.ly/magamapguide](http://bit.ly/magamapguide)

# MAGA RALLY MAP GUIDE



## FREEDOM RALLY

10:00 AM - 4:00 PM

Join us Wednesday, January 6 at the United States Capitol for a gathering to celebrate America, freedom, health, and life with #1LoudVoice, as one nation, under God, indivisible, with liberty and justice for all!

- ▶ The Global Front-Line Nurses | 9am - 10am
- ▶ Latinos For Trump | 10am - 12pm
- ▶ Freedom Speakers | 12pm - 4pm
  - ▶ Roger Stone
  - ▶ George Papadopoulos
  - ▶ Ty Bollinger
  - ▶ Pastor Greg Locke
  - ▶ Joey Gilbert
  - ▶ And More...

[FREEDOMRALLY2021.COM](http://FREEDOMRALLY2021.COM)

## WILD PROTEST

10:00 AM - 5:00 PM

We the People must take to the US Capitol lawn and steps and tell Congress #DoNotCertify on #JAN6! Congress cannot certify this fraudulent Electoral College.

- ▶ Rep. Paul Gosar
- ▶ Ali Alexander
- ▶ Roger Stone
- ▶ Scott Presler
- ▶ Jenny Beth Martin
- ▶ State Rep. Vernon Jones
- ▶ Rep. Lance Gooden
- ▶ State Rep. Mark Finchem
- ▶ Dr. Simone Gold
- ▶ Maggie VandenBerghe
- ▶ Brandon Straka
- ▶ Kelly Ward
- ▶ Rob Weaver
- ▶ Arina Grossu
- ▶ And More...

[WILDPROTEST.COM](http://WILDPROTEST.COM)

## FREEDOM RALLY

## WILD PROTEST

## JERICO MARCH

## JERICO MARCH

11:45 AM - 12:30 PM

"Save The Republic" Pray, March, Fast, and Rally For Election Integrity

- ▶ U.S. Capitol Blessing before the start of the Jericho March | 11:45 AM
- ▶ Shofars blown, led JERICO MARCH around the U.S. Capitol | 12:00 PM
- ▶ Event organizers Rob Weaver and Arina Grossu

[JERICOMARCH.ORG](http://JERICOMARCH.ORG)

## MARCH FOR TRUMP

DOORS OPEN AT 7:00

Democrats are scheming to disenfranchise and nullify Republican votes. It's up to the American people to stop it.

- ▶ The Elipse Rally | Doors Open 7 AM | Starts 9 AM
- ▶ U.S. Capitol | 1 PM

[MARCHTOSAVEAMERICA.COM](http://MARCHTOSAVEAMERICA.COM)

ROAD CLOSURE AREA

**FOLLOW SADIES**  
#DONOTCERTIFY #JAN6 #STOPTHESTEAL #WILDPROTEST #1LOUDVOICE  
#HOLDTHELINE #GORIGHT #MARCHFORTRUMP #TAKEBACKAMERICA



SCAN ME  
FOR LATEST



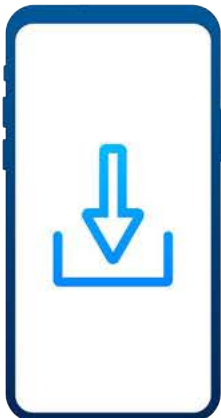
wmata.com  
Information: 202-637-7000 | TTY: 202-962-2033  
Metro Transit Police: 202-962-2121 | Text: MYMTPD (696873)

## Legend

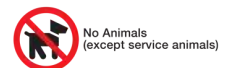
- BL** Blue Line • Franconia-Springfield / Largo Town Center
- GR** Green Line • Branch Ave / Greenbelt
- YL** Yellow Line • Huntington / Greenbelt
- SV** Silver Line • Wiehle-Reston East / Largo Town Center

- Hospital
- Airport

Connecting Rail Systems



# Download the app





**TRUMP WANTS TO SEE YOU IN DC**

JAN 5   1 PM	JAN 6   9 AM	JAN 6   1 PM
 <b>FREEDOM PLAZA</b>	 <b>THE ELLIPSE</b> PRESIDENT'S PARK	 <b>CAPITOL BLDG</b> (NORTH EAST DR)

**MARCHTOSAVEAMERICA.COM**

**PRAYER WALK**  
**Washington DC**  
**January 5, 2021**

Around the Lincoln Memorial & Reflecting Pool, to pray for the rally and Congressional meeting on Jan 6, in support of President Donald J. Trump

*Join the Fight FOR Freedom!*

**MAGA**  
**FREEDOM RALLY D.C.**

**JANUARY 6, 2021 10 AM TO 4 PM**  
**LATINOS FOR TRUMP 10 AM TO 4 PM HEALTH FREEDOM 12 PM TO 4 PM**  
**UNITED STATES CAPITOL 300 First St NE Washington, D.C. 20002**

Kevin Jenkins, Roger Stone, Ty Bollinger, Charlene Bollinger, Marsha Lessard, Del Bigtree, Mike Smith, Pastor Greg Locke, Dr. David Martin, Clay Clark, Mikki Willis, Lori Gregory

**CLICK LINK ABOVE TO REGISTER**  
FreedomRally2021.com #1LoudVoice MAGAFreedomRallyDC.com

VIRGINIA Freedom Keepers

BROUGHT TO YOU BY  
★ United Medical Freedom  
★★★ Super PAC



# Save Our Republic

Pray, March, Fast, and Rally  
for Election Integrity  
January 2-6 | Wash DC

## Saturday, January 2, 2021

**12 PM:** Self-led **JERICO MARCH** around the U.S. Capitol or Supreme Court.

**6:30-8:30 PM:** Self-led **Candlelight Prayer Vigil** at the National Christmas Tree in front of the White House for VP Pence.  
Bring your own candles! (1450 Pennsylvania Ave. NW)

## Sunday, January 3, 2021

**12 PM:** Self-led **JERICO MARCH** around the U.S. Capitol or Supreme Court.

**6:30-8:30 PM:** Self-led **Candlelight Prayer Vigil** at the U.S. Naval Observatory for VP Pence. Bring your own candles! (1 Observatory Circle)

## Monday, January 4, 2021

**12 PM:** Self-led **JERICO MARCH** around the U.S. Capitol or Supreme Court.

**1:30 PM:** Self-led **Prayer Vigil** at the Russell Senate Office Building for Sen. Mitch McConnell (224 1<sup>st</sup> St. NE, DC) followed by visits to his office calling on him to #DoNotCertify (317 Russell Senate Office Building).

**6:30-8:30 PM:** Self-led **Candlelight Prayer Vigil** at the U.S. Naval Observatory for VP Pence. Bring your own candles! (1 Observatory Circle)

## Tuesday, January 5, 2021

**11:45 AM:** **Supreme Court Blessing** before the start of the Jericho March. (Meet @ corner of 1<sup>st</sup> St. SE and East Capitol St. NE)

**12 PM:** Shofars blown, led **JERICO MARCH** around the Supreme Court (Meet @ corner of 1<sup>st</sup> St. SE and East Capitol St. NE)

**1:30 PM:** Self-led **Prayer Vigil** at the Russell Senate Office Building for Sen. Mitch McConnell (224 1<sup>st</sup> St. NE, Washington, DC) followed by visits to his office calling on him to #DoNotCertify (317 Russell Senate Office Building)

**1-3 PM:** **Moms for America® Save the Republic Rally** at the U.S. Capitol, Washington D.C. (Corner of Constitution Ave NE and 1<sup>st</sup> St NE.)

**2-5 PM:** **"ONE NATION UNDER GOD" Prayer Rally** at the Supreme Court (Hosted by Virginia Women for Trump in collaboration with Stop the Steal, AmericanPhoenix.org, and Jericho March)

**6:30-8:30 PM:** Self-led **Candlelight Prayer Vigil** at the U.S. Naval Observatory for VP Pence. Bring your own candles! (1 Observatory Circle)

## Wednesday, January 6, 2021

**11:45 AM:** **U.S. Capitol Blessing** before the start of the Jericho March. (Meet @ corner of 1<sup>st</sup> St. SW and Independence Ave. SW)

**12 PM:** Shofars blown, led **JERICO MARCH** around the U.S. Capitol (Meet @ corner of 1<sup>st</sup> St. SW and Independence Ave. SW)

**10 AM-5 PM:** **Stop the Steal's** [www.WILDPROTEST.com](http://www.WILDPROTEST.com) (Capitol Hill Northeast, Capitol Cir NE)

EVENTS BY:




ONE NATION UNDER GOD




PHYLLIS SCHLAFLY  
EAGLES







# ONE NATION UNDER GOD




## VIRGINIA WOMEN FOR TRUMP

in collaboration with

### Stop The Steal, AmercianPhoenix.Org, Jericho March

cordially invites you to this event intended to create the spiritual energy to touch the hearts of members of Congress and the Senate that they may become more aware of their great responsibility to preserve our Constitution, the Principles of our Founding Fathers and keep our country One Nation Under God.

**Date:** Tue, Jan 5th, 2021  
**Time:** 2-5PM  
**Location:** Supreme Court



**Prayer:** Bishop Leon Benjamin  
**Patriotic Music**  
**Speakers**  
**Hymns by Candlelight**

**Speakers:**  
**Roger Stone**

Stephen Moore, Economic Adviser to President Trump  
Joe Flynn, brother of General Mike Flynn  
Mary Flynn, sister of General Mike Flynn  
Cheryl Chumley - Opinion Editor of The Washington Times  
Leigh Taylor Dundas, President for Advocates for Citizens' Rights, California  
Alice Butler-Short - Founder & President, Virginia Women For Trump  
Suzanne Monk - DC Women For Trump  
Astrid Hajjar - Massachusetts Women For Trump  
Elysia Borrelli - Connecticut Women For Trump  
Lynz Piper-Loomis - South Carolina Women For Trump  
Carol Leek, President, Oregon Women For Trump  
Caroline Weatherington, Women For Trump, Florida  
Debbie Vance, United America For Trump, Indiana  
Christi McLaughlin, Congressional Candidate FL 19  
Manga Anantatmula, Congressional Candidate, VA 11  
Thomas Speciale, National Chair, Veterans For Trump  
Matt Shannon, Advisor, National Diversity Coalition For Trump  
Ali Alexander, Founder of Stop The Steal  
Alex Bruesewitz, friend of Virginia Women For Trump  
Rob Weaver & Arina Grossu, Founders of Jericho March  
American Phoenix Project: Alan Hostetter, Russ Taylor, Morton Irvine Smith

Please bring a white candle or LED votive lights. Buy some to share.



## Special Appearances from other Patriots!



Bianca Gracia

President Latinos for Trump La Trumpista



Becky

Trump 2016 Photographer



Gene Ho



Stephen Willeford

Good Guy with a Gun



Kelly SoRelle

Lawyers for Trump



Maurice Symonette  
Blacks for Trump



CC Davis  
Blexit



Josh Macias  
Vets4Trump



RC Pittman  
Boots on the Ground  
Bikers for Trump



Carla Spalding  
Congressional Candidate



Alex Phillips  
American Priorities



Michelle Terris  
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Dran Reese



Keith & Kenny Lee  
MAGA DRAG



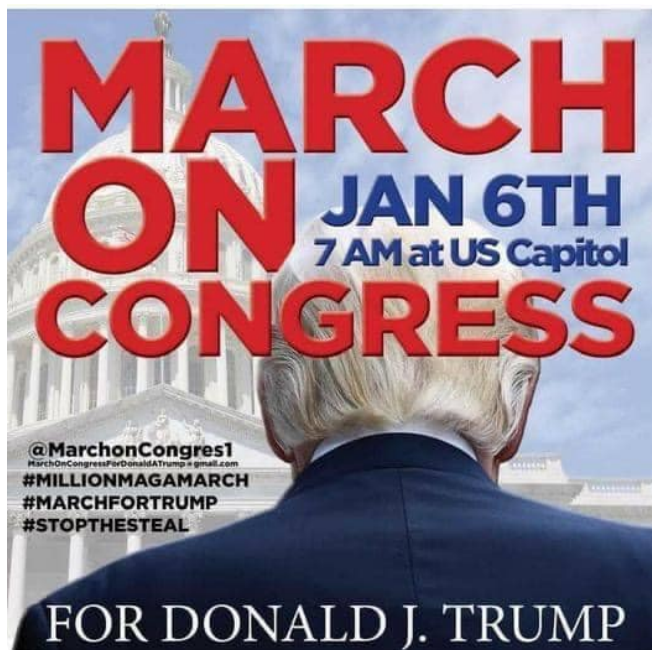
Jason Sullivan  
Wizard of Twitter



# FREEDOM RALLY

#1LoudVoice

latinosfortrump.us





# ONE NATION — UNDER GOD



**PETITION CONGRESS | JANUARY 6TH**  
**10 AM TO 2:30 PM | U.S. CAPITOL**



**AZ STATE REPRESENTATIVE  
ANTHONY KERN**



**AZ STATE REPRESENTATIVE  
MARK FINCHEM**



**GA STATE REPRESENTATIVE  
VERNON JONES**



**PA STATE SENATOR  
DOUG MASTRIANO**



**U.S. CONGRESSMAN  
LANCE GOODEN**



**U.S. CONGRESSMAN  
ANDY BIGGS**



**U.S. CONGRESSMAN  
DR. PAUL GOSAR**



**U.S. CONGRESSMAN  
JODY HICE**



**U.S. CONGRESSMAN  
MO BROOKS**



**U.S. CONGRESSMAN  
TED BUDD**



**U.S. CONGRESSWOMAN-ELECT  
LAUREN BOEBERT**



**U.S. CONGRESSWOMAN-ELECT  
MARJORIE GREENE**



# London Health Sciences Centre

People Services  
 800 Commissioners Road East  
 PO Box 5010  
 London, Ontario, Canada N6A 5W9

January 15, 2021

Kristen Nagle  
 144 Britannia Ave  
 London ON N6H 2J5

Dear Kristen,

This letter will summarize the meeting held on January 13, 2021 where I met with you to discuss concerns related to you failing to adhere to the College of Nurses Code of Conduct, Standards of Practice and LHSCs Standards for Business Conduct. Also present in this meeting was Joanna MacMillan, Manager, Employee & Labour Relations, Layla Assaf, Consultant – Nursing Professional Practice and ONA representatives James Gibbons and Rebecca Jesney.

During the meeting, we discussed your conduct and active social media posts in which you promote anti-masking and anti-distancing in public forums. You identify as a Registered Nurse working in the Neonatal Intensive Care Unit (NICU) in London, Ontario. When questioned about meeting the expectations set out by CNO's Code of Conduct which informs all Ontario nurses of their accountabilities to the public, and outlines expectations of professional behavior and conduct you replied "I believe I am following ethics that are set out in nursing". When questioned if you feel you have been a role model for the Public Health directives put in place to keep the public safe, your response was "Yes". Subsequently, when you were asked if you believe your conduct aligns with LHSC's Standards for Business Conduct, you stated "I believe I am following ethics".

Kristen, your conduct, lack of compliance and blatant disregard for the Public Health directives is extremely concerning. We have completed our investigation and determined that your public communication regarding anti-masking and anti-distancing has breached LHSCs Standards for Business Conduct, both the College of Nurses Code of Conduct and Standards of Practice and contravenes the Public Health directives. This behaviour is considered professional misconduct. As a result, you are hereby advised that your employment is terminated for cause, effective immediately.

As required by the College of Nurses mandatory reporting, the Hospital is obligated to report the termination of your employment.

Human Resources will submit your Record of Employment (ROE) electronically to Service Canada. To apply for EI benefits and to access your ROE and other claim information, go to the Service Canada website at [www.servicecanada.gc.ca/eng/home.shtml](http://www.servicecanada.gc.ca/eng/home.shtml). Any monies owing to you which you have accrued to date will be paid to you by direct deposit.

Sincerely,

Jeanette Mills  
 Manager, Children's Care  
 CC: Employee File  
 People Services  
 ONA



Court File No. CV-21-00673636-0000

**CANADIAN FRONTLINE NURSES ET AL.**

**-and -**

**CANADIAN NURSES ASSOCIATION ET AL.**

Plaintiffs  
(Responding Parties)

Defendants  
(Moving Parties)

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(PROCEEDINGS COMMENCED AT TORONTO)**

**JOINT SUPPLEMENTARY MOTION RECORD  
(Transcripts of Cross-Examinations)  
VOLUME 2 of 3**

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