

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

RESPONDING MOTION RECORD OF THE PLAINTIFFS

July 15, 2022

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INDEX

Document	Pages
Affidavit of Aditi Gupta sworn July 14, 2022	5-6
Exhibit “A” – Printout of article entitled “Enough is enough: professional nurses stand for science-based health care”, dated September 9, 2021 from Canadian Nurses Association website	7-10
Exhibit “B” – Printout of article entitled “Quack Quack! These Pro-Virus Nurses Have Dangerous Ideas”, undated, from the ComoxValley.News website	11-16
Affidavit of Kristen Nagle sworn July 14, 2022	17-27
Exhibit “A” – Printout of National Post Article dated September 12, 2021 entitled “Nurses who attended anti-COVID-measure rally in D.C. in January helping organize cross-country events in Canada”	28-35
Exhibit “B” – Printout of CBC article dated September 13, 2021 entitled “Politicians, medical groups condemn protests outside hospitals across Canada”	36-43
Exhibit “C” – Printout of London Free Press article dated September 13, 2021 entitled “Fired London nurse helping organize anti-lockdown hospital protests”	44-51
Exhibit “D” – Printout of Pique Newsmagazine article dated September 11, 2021 entitled “The nurses who organized Vancouver’s anti-vax protest aren’t who you think they are”	52-60
Exhibit “E” – Printout of September 14, 2021 Times Colonist article entitled “The nurses behind Vancouver’s anti-vax protests”	61-66
Exhibit “F” – Copy of College of Nurses of Ontario Appointment of Investigator notice dated October 7, 2021 (Nagle)	67-72
Affidavit of Sarah Choujounian sworn July 14, 2022	73-81
Exhibit “A” – Copy of letter setting out Choujounian’s termination from her employment from S.R.T. MedStaff dated January 14, 2021	82-83
Exhibit “B” – Copy of Certificate of Incorporation for Canadian Frontline Nurses dated April 6, 2021	84-88

Exhibit “C” – Printout of a digital flyer for Canada Wide Protest	89-90
Exhibit “D” – Copy of College of Nurses of Ontario Appointment of Investigator notice dated October 7, 2021 (Choujounian)	92-96
Affidavit of Kristal Pitter sworn July 14, 2022	97-100
Exhibit “A” – Copy of College of Nurses of Ontario Appointment of Investigator notice dated October 7, 2021 (Pitter)	101-106
Affidavit of Danielle Pistilli sworn July 14, 2022	107-111

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JOHN DOE

Defendants

AFFIDAVIT OF ADITI GUPTA

I, Aditi Gupta, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY:

1. I am a legal assistant at Johnstone & Cowling LLP, counsel for the Plaintiffs,
Canadian Frontline Nurses, Sarah Choujounian, Kristen Nagle and Kristal Pitter, and as
such have knowledge of the matters contained in this affidavit. Where I make statements
in this affidavit that are not within my personal knowledge, I have identified the source of
that information and belief. All the information I have deposed to, I verily believe to be
true.
2. Attached as Exhibit “A” is a printout of an article from the Canadian Nurses Association
website entitled “CNA News Room Enough is enough: professional nurses stand for

<https://www.cna-aic.ca/en/blogs/cn-content/2021/09/09/enough-is-enough-professional-nurses-stand-for-sci>

- SWORN BEFORE ME at the City of
Toronto, on July 14, 2022



Alexander Boissonneau-Lehner

~~Adit~~

Aditi Gupta

**This is Exhibit "A" referred in the Affidavit of Aditi Gupta
sworn July 14, 2022.**

A handwritten signature in black ink, appearing to read 'ALEXANDER BOISSONNEAU-LEHNER', written over a horizontal line.

Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner



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CNA News Room

Enough is enough: professional nurses stand for science-based health care

September 9, 2021 – The Canadian Nurses Association (CNA) and Canadian nurses stand strongly united behind science and the best available evidence as the basis for professional nursing practice and decision-making. Nursing is a rigorously educated, regulated and autonomous profession, and it is first a discipline based in science — not a random gathering of personal opinions and ideologies.

The reckless views of a handful of discredited people who identify as nurses have aligned in some cases with angry crowds who are putting public health and safety at risk. They have drawn in anti-science, anti-mask, anti-vaccine, anti-public health followers whose beliefs align with theirs. For some reason they would have us believe that millions of the best educated health scientists, public health experts, physicians and nurses globally have all missed something they have not. Their outlandish assertions about science would be laughable were they not so dangerous.

The media used to be filled with images of the public cheering nurses around the world; now the focus is on images of surly mobs happy to stand in front of health-care settings and harass, threaten, and even assault health-care workers coming and going in the business of saving lives. These protests have stunned and saddened exhausted health-care workers. They are demoralizing, infuriating and dangerous. The situation is completely unacceptable, and it must stop immediately.

All opinions are not equal when it comes to public safety. Nurses have worked for more than a century to build the regulatory, education, common competencies, professional and union structures that have generated one of the workforces most respected and trusted by the public. And the Canadian nursing workforce is admired around the world for its high levels of education and standards of practice. CNA is proud of these world-leading achievements. Some are willing to put all that at risk; we are not.

Anti-public health disinformation threatens to confuse a tired and bewildered public by deliberately misrepresenting personal ideology as facts, and science as conspiracy. The public should be assured that the vast majority of Canada's 448,000 regulated nurses are united in their commitment to operate from a stringent code of ethics, and they are duty-bound to use science, evidence, and facts in assessing, planning, and evaluating the care they deliver to people across Canada. This scientific approach is a fundamental ideology of modern nursing.

We will continue to monitor this situation and do all we can to maintain the trust and ensure the safety of people everywhere in Canada.

Tim Guest, M.B.A., B.Sc.N., RN

President

president@cna-aiic.ca

Michael Villeneuve, M.Sc., B.Sc.N., RN, FAAN

Chief Executive Officer

ceo-dg@cna-aiic.ca

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Canadian Nurses Association

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800-361-8404



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Association

Print

**This is Exhibit "B" referred in the Affidavit of Aditi Gupta
sworn July 14, 2022.**



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner



Quack Quack! These Pro-Virus Nurses Have Dangerous Ideas

They call themselves Canadian Frontline Nurses, but the founders are stoking fear, division, and conspiracy

10 months ago | VanIsle.News Staff

While Canadian health care workers are fighting to keep people safe, a small group of disgraced nurses is putting us in danger

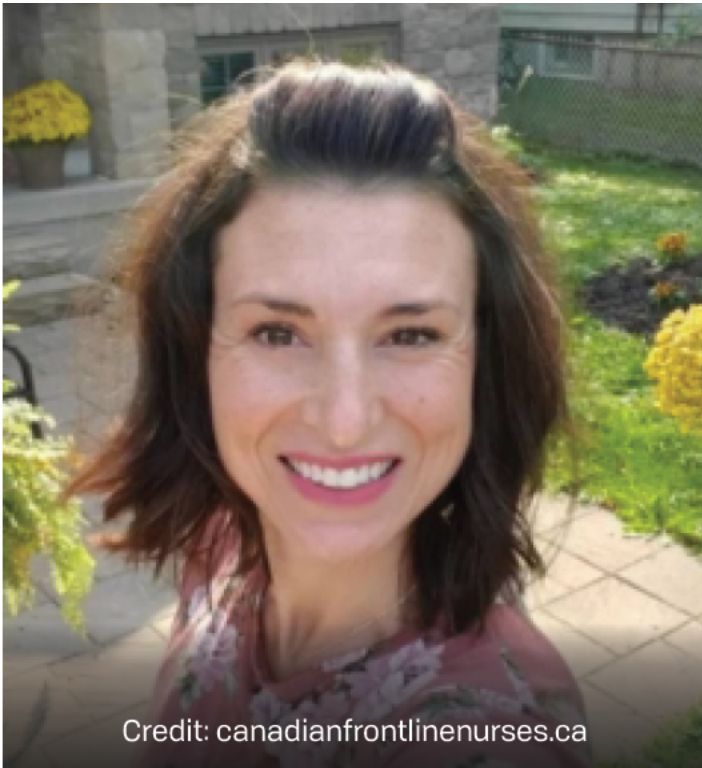
A small group of unhinged, conspiracy touting nurses appear to be the masterminds behind the recent anti-vax protests across Canada.

On September 1st, mobs of people swarmed hospitals to scream and hurl insults at frontline healthcare workers. A nurse was spat at while heading to her shift at Nanaimo General Hospital. They organized the anti-vax rally at Vancouver General Hospital earlier this month.

These protesters made it hard for the workers to do their jobs that day. They also made it harder for sick people to get the care they need.

So it's time to shine a light on the rotten roots of these protests.

For starters, let's talk about Sarah Choujounian, a former registered practical nurse, and Kristen Nagle, a former neonatal ICU nurse. The emphasis here is on the word "former," because they've both been fired.



Credit: canadianfrontlinenurses.ca



Credit: Sarah Choujounian / Twitter

(Left) Kristen Nagle (Right) Sarah Choujounian

Now they don't look like they are working as nurses, but rather as full-time anti-vax crusaders.

These two disgraced Ontario nurses are the co-founders of *Canadian Frontline Nurses*.

The organization, which launched in January 2021 (remember that date), says they stand for freedom and choice while denying the science around COVID-19.

The Canadian Frontline Nurses Facebook page was launched on January 11, 2021, its website a few days later.

They certainly had a busy January.

Do you remember what else happened in January?

That's right, a right-wing mob attacked the US Capitol Building and rioted in the streets on January 6th.

And guess who was there?

Just a few days before launching their new organization, they went down to Washington, D.C. to be part of the Trump-inspired protests

Kristen Nagle, the former baby nurse, spoke at an anti-lockdown rally before hundreds

Interesting way to spend your vacation days.

Both of these nurses were fired from their jobs for going against the non-essential travel ban to join the MAGA mob at the White House.

But that wasn't their first controversy. Both have organized and participated in rallies against wearing masks and government-mandated lockdowns during the COVID-19 pandemic.

Another nurse behind these protests is Kristal Pitter. She used to work in long-term care as a home inspector, but she was fired after spewing garbage about Bill Gates using a COVID-19 vaccine to alter people's DNA.

Wait—didn't a huge percentage of Ontario's COVID deaths occur in long-term care facilities?



Photo: Kristal Pitter / Facebook

Pitter is accused of using social media to spread health misinformation, including the myth that vaccines cause autism. She also claims the coronavirus pandemic is a huge conspiracy.

Do you think we're making this stuff up?

Read for yourself! Google their bios on ***Canadian Frontline Nurses***. They are weirdly self-incriminating.

What Nagle doesn't say in her bio—but gleefully shares in her blog and Facebook posts—are some wild, dangerous, and unfounded ideas.

For example, she doesn't think viruses exist. Any viruses, not just the coronavirus.

She believes rabies is caused by malnourishment and mistreatment—not the ***rabies virus***.

And she says there's no such thing as polio.

Hmmmm...

neonatal intensive care unit?

And then there is the question no one seems to have an answer for. Where did these conspiracy-spewing nurses who have no jobs get the money to launch a new organization with nationwide protests, fancy expensive signs, and scripted talking points?

Legitimate nursing organizations have condemned ***Canadian Frontline Nurses***. The ***Canadian Nurses Association*** attacked their anti-vax disinformation as “conspiracy” in a release entitled, “Enough is enough.”

“The reckless views of a handful of discredited people who identify as nurses have aligned in some cases with angry crowds who are putting public health and safety at risk. They have drawn in anti-science, anti-mask, anti-vaccine, anti-public health followers whose beliefs align with theirs... Their outlandish assertions about science would be laughable were they not so dangerous.”

The point is not what these science-denying nurses believe or don't believe.

We live in Canada. Freedom of expression, faith, and belief are part of our society, no matter how outside of the norm some of them may be.

But what these former nurses are saying is dangerous and unprofessional.

They are using the authority of the nursing profession to make themselves sound legitimate. They create confusion and division when people need to come together.

Choujounian, Nagle and Pitter can call these protests whatever they like. But their version of freedom would lead to more COVID cases and likely more deaths. That means they're basically pro-virus and their selfish take on freedom is mostly about putting their personal desires above protecting the health of their patients, coworkers and neighbours.

Their ME-FIRST ideas have real-world impacts.

This is not innocent speech. It's like they're yelling FIRE! in a crowded theatre. Everyone panics, but there's no fire.

Doctors can lose their licenses for spreading COVID misinformation. Nurses should, too.

I suppose, if you're like Kristen Nagle and you don't believe in viruses, then none of this

But if you care about your family and neighbours, then think twice before you trust these quacks.

They got fired because their own bosses didn't trust them.

Why should you?

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JOHN DOE

Defendants

AFFIDAVIT OF KRISTEN NAGLE

I, Kristen Nagle, of the City of London, in the Regional Municipality of Peel, make oath and say:

1. I am a Plaintiff in these proceedings and a member of Canadian Frontline Nurses. As such I have knowledge of the matters to which I hereinafter depose. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of my information and belief. All of the information I have deposed to I verily believe to be true.
2. I am a registered nurse. I am entitled to practice with no restrictions.
3. I obtained my Bachelor of Science in Nursing and graduated with Dean's Honours from the University of Western Ontario.

4. I am not presently employed as a nurse, and have not been since I was terminated from my position with the London Health Sciences Centre – Children’s Hospital of Western Ontario (“LHSC”) on January 15, 2021.

5. I am the co-founder of Canadian Frontline Nurses. Sarah Choujounian is the other co-founder of Canadian Frontline Nurses. We started Canadian Frontline Nurses in January of 2021.

6. I did not travel to Washington, D.C. on January 6, 2021 or any other date to be part of Trump-inspired protests.

7. I travelled to Washington, D.C. on January 6, 2021 to partake in a health and freedom summit organized by Global Frontline Nurses which was being held near the United States Supreme Court.

8. I had no foreknowledge that President Trump would make a speech to his supporters in Washington D.C. on January 6, 2021.

9. I was not aware that the joint session of Congress was scheduled to count the electoral college votes on January 6, 2021.

10. I had no foreknowledge that there would be an attack on the Capitol Building in Washington D.C. on January 6, 2021.

11. I did not invade the Capitol Building or any other place where the United States Congress conducts business on January 6, 2021 or on any other date.

12. I did not choose to participate in a “Trump-inspired” rally, nor did I participate in a Trump-inspired rally.

13. I did not join a MAGA mob at the White House.

14. I was not terminated from my position with LHSC for joining a MAGA mob at the White House.

15. Canadian Frontline Nurses organized a number of rallies to take place across Canada on September 1, 2021. The rallies that were organized by Canadian Frontline Nurses took place at the following locations on September 1, 2021:

- (a) Victoria – Victoria Hospitals Foundation
- (b) Vancouver – Vancouver General Hospital
- (c) Kamloops – 311 Columbia Street
- (d) Calgary – Foothills Medical Centre
- (e) Edmonton – Royal Alexandra Hospital
- (f) Saskatoon – City Hospital
- (g) Winnipeg – Health Sciences Centre
- (h) Toronto – UHN
- (i) London – LHSC Victoria Campus

- (j) Barrie – RVH
- (k) Ottawa – The Ottawa Hospital
- (l) Sudbury – Health Sciences Centre North
- (m) Montreal – Centre Hospitalier de l'Université de Montréal (CHUM)
- (n) Quebec City – Hôtel-Dieu de Québec
- (o) Moncton – George Dumont
- (p) Charlottetown – The Queen Elizabeth Hospital
- (q) Halifax – Queen Elizabeth II Health Sciences Centre
- (r) Saint John – Regional Hospital

16. I understand, from my review of various social media posts prior to September 1, 2021, and my reading of stories reported in the media after September 1, 2021, that a protest was held in front of a hospital in Nanaimo, British Columbia on September 1, 2021. Neither Canadian Frontline Nurses nor I were involved in organizing the protest in Nanaimo and I have no personal knowledge of what may have occurred during this protest on September 1, 2021.

17. My main role in organizing the Canadian Frontline Nurses September 1, 2021 rallies was to coordinate with individuals and organizations who I had met and who shared Canadian Frontline Nurses' values. I coordinated with these individuals together with Canadian Frontline Nurses' provincial representatives to arrange a simultaneous nationwide peaceful protest.

18. The protest sites were determined by me in coordination with regional representatives to ensure that the locations selected were safe for a peaceful protest and could be carried out in a manner that would not impede access to the hospitals.

19. I encouraged the Canadian Frontline Nurses representatives and partners who were assisting with the organization of their local protests to reach out to their respective local police forces in order to advise them in the protest in advance.

20. Canadian Frontline Nurses decided to organize protests on September 1, 2021 as we had become aware that hospitals across Canada were in the process of implementing – or had already implemented – policies requiring its healthcare workers to provide proof of COVID-19 vaccination if they wished to maintain active employment at the hospital.

21. Canadian Frontline Nurses stands for medical and nursing ethics and the principles of medical freedom and informed and uncoerced consent.

22. Most of our membership, myself included, do not believe that the evidence supports that COVID-19 vaccines are effective in preventing transmission.

23. Canadian Frontline Nurses and I felt that it was appropriate to protest in the vicinity of hospitals for several reasons. First, we understood that the policies that were being instituted by many hospitals across the country forced fellow nurses and healthcare workers who were not willing to voluntarily received a COVID-19 vaccine to “choose” between continuing their important work and receiving a COVID-19 vaccine that they did not want to receive. It was our

belief that protesting in the vicinity of the hospitals would bring awareness to the difficult position that the hospital policies created for nurses who did not want to receive a COVID-19 vaccine yet wished to continue their work. Second, we wished to express our solidarity with the nurses who worked in the hospitals that found themselves in this difficult position.

24. I personally took responsibility for organizing the rally that was to take place at the LHSC Victoria Campus hospital in London, Ontario on September 1, 2021 (the “London Rally”).

25. I reached out to London Police in advance of the protest to advise them of the planned London Rally and to let them know about the event in the hope that this awareness would enable the police to ensure that the peace was maintained, and that none of the roadways leading to the hospital would be impeded by the protest.

26. On September 1, 2021, I participated in the London Rally. Kristal Pitter also participated in the London Rally that day.

27. London Police was present at the London Rally. To the best of my knowledge, no individuals were detained, arrested, or charged as a result of their participation in the London Rally.

28. During the London Rally, I personally observed and spoke with nurses and other healthcare workers who emerged from the hospital to either join the rally or express gratitude for us being

there. I also observed and heard other healthcare workers who were affiliated with the hospital express that they were not in favour of the London Rally and its goals.

29. I did not harass, threaten, assault, or impede anyone at the London Rally.

30. Throughout my participation in the London Rally, I did not observe any patients, healthcare workers, or any other individuals being impeded from accessing the hospital.

31. I did not observe anyone being assaulted at the London Rally.

32. I did not observe anyone who formed part of the London Rally harass, threaten, or scream insults at healthcare workers.

33. I coordinated with Canadian Frontline Nurses representatives and individuals who had partnered with Canadian Frontline Nurses after the September 1, 2021 protests. Based on my discussions with these individuals who reported their observations of the protest to me, I verily believe that none of the September 1, 2021 protests organized by Canadian Frontline Nurses impeded healthcare workers from performing their jobs or made it more difficult for sick people to obtain the care they needed at the hospitals.

34. Canadian Frontline Nurses and I received hateful messages and threats of physical harm in the wake of the September 1, 2021 protests and the Canadian Nurses Association and Together News publications.

35. I verily believe that my personal and professional reputation have been adversely affected by the Canadian Nurses Association and the Together News publications that are set out in the Statement of Claim. The Canadian Nurses Association and Together News publications falsely characterize me as a discredited, dangerous, and unprofessional person. These publications falsely associate me and Canadian Frontline Nurses with protests where healthcare workers were being harassed and assaulted. The Together News publication falsely associates me with protests that impeded healthcare workers from doing their jobs and interfered with patients receiving the care that they needed. The Together News article suggests that I was part of a right-wing mob who attacked the US Capitol Building.

36. In addition to Together News's publication concerning me and Canadian Frontline Nurses, numerous other articles relating to Canadian Frontline Nurses refer to the Canadian Nurses Association's September 9, 2021 publication. Such articles include:

(a) A National Post Article dated September 12, 2021 entitled "Nurses who attended anti-COVID-measure rally in D.C. in January helping organize cross-country events in Canada", which is accessible at the following URL: <https://nationalpost.com/news/canada/nurses-who-attended-anti-covid-measure-rally-in-d-c-in-january-helping-organize-cross-country-events-in-canada>. A printout of this article is also attached hereto and marked as Exhibit "A".

(b) A CBC article dated September 13, 2021 entitled "Politicians, medical groups condemn protests outside hospitals across Canada" <https://www.cbc.ca/news/canada/toronto/covid-hospital-protests-canada->

[1.6173437](#). A printout of this article is also attached hereto and marked as Exhibit “B”.

(c) A London Free Press article dated September 13, 2021 entitled “Fired London nurse helping organize anti-lockdown hospital protests”, which is accessible at the following URL: <https://lfpres.com/news/local-news/fired-london-nurse-helping-organize-anti-lockdown-hospital-protests>. A printout of this article is also attached hereto and marked as Exhibit “C”.

(d) A Pique Newsmagazine article dated September 11, 2021 entitled “The nurses who organized Vancouver’s anti-vax protest aren’t who you think they are”, which is accessible at the following URL: <https://www.piquenewsmagazine.com/must-reads/the-nurses-who-organized-vancouvers-anti-vax-protest-arent-who-you-think-they-are-4324683>. A printout of this article is also attached hereto and marked as Exhibit “D”.

(e) A September 14, 2021 Times Colonist article entitled “The nurses behind Vancouver’s anti-vax protests”, which is accessible at the following URL: <https://www.timescolonist.com/local-news/the-nurses-behind-vancouvers-anti-vax-protests-4692044>. A printout of this article is also attached hereto and marked as Exhibit “E”.

37. Canadian Frontline Nurses organized another Canada-wide “silent vigil” protest across Canada, which were to take place in proximity of hospitals on September 13, 2021. The silent vigil was meant to honour and reflect upon individuals who have been adversely affected by

COVID-19 mandates. The reasons for wishing to hold our protests in the vicinity of hospitals were the same as I deposed to at paragraph 23 of this affidavit.

38. I observed that the reaction to the silent vigil protest on September 13, 2021 from the public and government officials was far more hostile than the reaction to the September 1, 2021 rallies spearheaded by Canadian Frontline Nurses. I verily believe that the significant hostility towards the protests that were organized by Canadian Frontline Nurses on September 13, 2021 were motivated in large part by: the false reports of healthcare workers being harassed, assaulted, and impeded from doing their jobs on account of the September 1, 2021 protests organized by Canadian Frontline Nurses; the false reports that these September 1, 2021 rallies interfered with patients receiving the care that they needed; and the demonization of Canadian Frontline Nurses and its membership in these false reports.

39. As a result of the hostile reaction to our September 13, 2021 protests, it became clear to me that Canadian Frontline Nurses and its membership could no longer express its peaceful dissent against COVID-19 related mandates near hospitals. I posted a livestream video to Instagram on September 13, 2021, wherein I discussed why Canadian Frontline Nurses would no longer to hold any further protests in the vicinity of hospitals. A recording of this September 13, 2021 video livestream is accessible at the following URL: <https://www.instagram.com/tv/CTxy9Owq1WY/>

40. On October 7, 2021, an investigator was appointed by the College of Nurses of Ontario (“CNO”) to ascertain whether I have committed an act of professional misconduct or if I am incompetent in respect of demonstration of knowledge, skill and judgment, use of a protected title,

professional conduct outside of the workplace, and fulfilling reporting obligations to the CNO. A copy of the Appointment of Investigator form dated October 7, 2021 is attached hereto and marked as Exhibit "F".

41. I am aware, through my review of the confidential disclosure package that was sent by the CNO on June 10, 2022 relating to the CNO's October 7, 2021 investigation, that there have been complaints from the public arising from my participation and Canadian Frontline Nurses' participation in the September 1, 2021 protests.

42. I am also aware, through my review of the confidential disclosure package, that the Canadian Nurses Association's September 9, 2021 publication formed part of the basis of some of the complaints made to the CNO concerning me.

43. The Canadian Nurses Association and Together News publications, and the damage that these publications have caused to my reputation, have caused me significant mental distress.

Sworn or Affirmed before me: ☐ in person OR ☒ by video conference

by Kristen Nagle of the City of London, in)
the Regional Municipality of Peel, before)
me at the City of Toronto on July 14, 2022)
in accordance with O. Reg. 431/20)
Administering Oath or Declaration)
Remotely.)

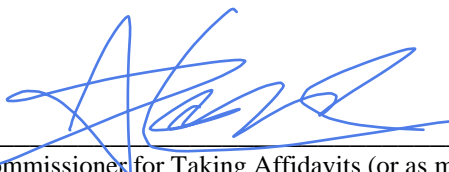
Commissioner for Taking Affidavits)



Alexander Boissonneau-Lehner


Kristen Nagle

This is Exhibit “A” referred in the Affidavit of Kristen Nagle
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

Nurses who attended anti-COVID-measure rally in D.C. in January helping organize cross-country events in Canada

Kristen Nagle and Sarah Choujounian have both long been active in the protests against public-health measures during the COVID-19 pandemic and were present at a rally in Washington on Jan. 6, the same day that pro-Donald Trump agitators stormed the Capitol building

[Tyler Dawson](#)

Sep 12, 2021 • September 12, 2021 • 4 minute read • 695 Comments



Sarah Choujounian and Kristen Nagle Photo by File

Cross-country protests rejecting vaccine passports and COVID-19 public health measures are planned for Monday, a series of demonstrations by a group that features among its organizers two Ontario nurses who travelled to Washington on the day of the infamous Jan. 6 riots at the Capitol building.

Story continues below

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The protests, scheduled for cities from Victoria to St. John's and organized by a group calling itself Canadian Frontline Nurses, echo those that have rippled across Canada in recent weeks in response to government

announcements that they would initiate some variety of vaccine passport system, which would limit the access unvaccinated Canadians have to public spaces.

Kristen Nagle and Sarah Choujounian, two of the organizers for the group, have both long been active in the protests against public-health measures during the COVID-19 pandemic and were present at a rally in Washington on Jan. 6, the same day that pro-Donald Trump agitators stormed the Capitol building.

In November 2020, Nagle was charged for organizing rallies in violation of Ontario's public health measures. She was, according to news reports at the time, put on paid leave from her job at the London Health Sciences Centre for actions "not aligned" with her employer's values. An investigation into her conduct wrapped up by mid-January 2021, and she was fired.

Story continues below

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"Kristen is passionate about children's health and empowering families to trust their bodies and immune systems, to support and not suppress symptoms and to live a more natural life in harmony with the Earth with full body sovereignty," says her bio on the group's website.

Choujounian was the founder of Nurses Against Lockdowns, which has since merged with Canadian Frontline Nurses. She has, according to her bio on the group's website, been fired from both her nursing jobs in Ontario.

Both women travelled to Washington last January for a rally organized by Global Frontline Nurses, an organization that claims there is no evidence that social distancing is helpful in reducing the spread of COVID-19 and that

"lockdowns do not work," both positions widely disputed by public-health experts.

Story continues below

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Sarah Choujounian, co-founder of Canadian Frontline Nurses, speaks at the North Bay 'Freedom Rally,' Monday.
Photo by File

In Washington, Choujounian said she was fired from her nursing job for posting online about her beliefs about lockdowns, and said restrictions on visiting nursing homes are "crimes against humanity."

Choujounian and Nagle are also both under investigation by the College of Nurses of Ontario for their conduct. The college did not respond to a request

for comment on Sunday.

The Post reached out to Canadian Frontline Nurses for comment on Sunday, but the organization did not respond by press time.

There have been protests around the country relating to vaccine passports in recent weeks, reinvigorating a movement that had, previously, held rallies across the country condemning mask mandates and lockdown measures taken in many provinces to curb the spread of COVID-19.


Story continues below

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Last week, the Canadian Nursing Association issued a strongly worded statement condemning the protests, saying the protests "have stunned and saddened exhausted health-care workers."

"The reckless views of a handful of discredited people who identify as nurses have aligned in some cases with angry crowds who are putting public health and safety at risk," said a statement. "Their outlandish assertions about science would be laughable were they not so dangerous."

Kristen Nagle



Kristen Nagle Photo by File

On Sunday, Toronto Mayor John Tory also came out against the protests, saying on Twitter "We all have a right to protest but abusing that right in order to harass people outside a hospital and spread misinformation about vaccines in the middle of the pandemic is unacceptable and beyond the pale."

Story continues below

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News reports from across the country detail verbal and physical abuse from protesters during the last major round of protests, including reports that ambulances and patients struggled to get through thousands of

demonstrators to get into hospitals.

On Sunday, Alberta Health Services said it is planning for the "increased" presence of protective services and police around the hospital when the protests occur Monday in order to "support staff and patients at the Royal Alexandra Hospital to feel safe when entering or leaving the hospital tomorrow."

Monday's protest, according to a Canadian Frontline Nurses Facebook post, are "more of a silent vigil where healthcare professionals and the general public are welcome to show their support for those against medical tyranny and to pay tribute to those affected by the measures put in place since last year."

Story continues below

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The protests have escalated to the extent that the presidents of the Ontario Medical Association and the Canadian Medical Association penned a joint statement earlier this month saying the protests are "precluding access to much needed health care settings and demoralizing health care workers."

"The health care workers who have worked tirelessly for months on end are being bullied and harassed for doing their jobs. This is wrong and unacceptable – full stop," the statement said.

With files from Tom Blackwell and The Canadian Press.

• Email: tdawson@postmedia.com / Twitter: [tylerrdawson](https://twitter.com/tylerrdawson)

This is Exhibit “B” referred in the Affidavit of Kristen Nagle
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

Politicians, medical groups condemn protests outside hospitals across Canada

A series of protests — against vaccine mandates and other COVID-19-related public health measures — held outside hospitals across Canada on Monday was condemned by politicians and health-care organizations as unacceptable and unfair to staff and patients.



Protesters linked arms outside of the Ontario Legislature in Toronto for several minutes, ahead of demonstrations against COVID-19 measures at local hospitals. Similar protests took place across the country on Monday. (Patrick Morrell/CBC)

A series of protests — against vaccine mandates and other COVID-19-related public health measures — held outside hospitals across Canada on Monday was condemned by politicians and health-care organizations as unacceptable and unfair to staff and patients.

The protests were organized by Canadian Frontline Nurses, a group founded by two Ontario nurses who have promoted conspiracy theories about COVID-19 and [attended rallies in the U.S. for those who think the pandemic is a "fraud."](#)

The group says the "silent vigils," expected in all 10 provinces, are meant to critique public health measures put in place to curb the spread of COVID-19.

Organizers oppose what they call "tyrannical measures and government overreach," adding that they are not encouraging nurses to walk out on their shifts or abandon patients.

One of the group's founders, registered practical nurse Sarah Choujounian, was at the Toronto protest.

"We have thousands with us across Canada, but obviously, we're only a few speaking because we've been fired," said Choujounian, who formerly worked at a local long-term care home.

Ontario Premier Doug Ford, whose government drew similar protests after he announced plans for a proof-of-vaccine system, condemned the latest round on Sunday in a tweet, describing such events as "selfish, cowardly and reckless."

WATCH / Protesters opposed to vaccine mandates rally outside hospitals:

Protesters rally against vaccine mandates, passports outside hospitals

With neither popular opinion nor science on their side, protesters rallied against COVID-19 vaccine mandates and passports outside hospitals across the country on Monday, making access difficult for patients and health-care workers.

The Registered Nurses Association of Ontario and Ontario Medical Association issued a joint statement "strongly condemning" the disruptions and calling for designated safe zones around health-care facilities to protect staff and patients — a proposal the province's New Democrats have also floated.

"Nurses, doctors and other health-care workers have been working around the clock on the front lines of the pandemic for 18 months helping to keep our communities safe," the joint statement said.

The University Health Network, which runs Toronto General Hospital, said staff who have cared for people dying of COVID-19 are particularly disheartened, noting health-care workers have been caring for COVID-19 patients for 18 months despite risks to themselves and their families.

"To see protests in front of hospitals is demoralizing for all who work here but particularly for the staff who have cared for the people dying of COVID-19, often without all of their family and loved ones around them," the network said in a statement.

Dozens of people in Calgary also took part in a protest against COVID-19-related public health measures. (Nancy Walters/CBC)

'COVID-19 heroes' need support, doctor says

Alberta Premier Jason Kenney condemned the protests at hospitals in Edmonton and Calgary, saying peaceful demonstrations are a constitutional right but they also have limits.

In a statement, he raised the possibility of the protesters facing legal action, "including the potential use of the Critical Infrastructure Defence Act," an act passed in 2020 which allows fines against anyone who blocks, damages or enters without reason any "essential infrastructure."

Dr. Kwadwo Kyerementang, head of critical care at The Ottawa Hospital, said it's important to not let the small numbers who are protesting undermine the positive reaction health workers have received from most Canadians.

"I don't want the select few to be the loud voice," he said. "Our staff, they've hustled, they've put in the extra mile there. And I know most of Canadians, most of Ontarians, most of the people in Ottawa are so appreciative of our efforts. We hear it daily."

"These COVID-19 heroes need the resources and supports to continue the battle — now in the thick of a fourth wave. They cannot and must not be distracted, or worse, discouraged by protests at the doorsteps of their workplaces."

WATCH | Head of Canadian Nurses Association speaks about protests:

Health-care workers, associations condemn hospital protests

Tim Guest, president of the Canadian Nurses Association, joins Power & Politics to discuss the protests that took place at hospitals around the country.

At least one Toronto emergency nurse agrees.

"There's been harassment and bullying," said Vikky Leung, who created a petition over the weekend also calling for the creation of safety zones around hospitals.

"There's been emails telling my colleagues not to wear scrubs or anything

that identifies them as health-care workers and I think that's truly upsetting and scary."

Leung is on maternity leave, but said she has felt fear and frustration after hearing from her colleagues about their experiences.

"People [are] stressed out and disheartened and really feeling unappreciated," she told *Metro Morning* on Monday.

WATCH | Trudeau says hospitals should be free of threats:

Trudeau vows to criminalize healthcare protests

Liberal leader Justin Trudeau announces that, if elected, his government would make it 'a criminal offence to block access to buildings that provide healthcare' or to threaten or intimidate healthcare workers.

"It's hard to see that, when you're going into work and leaving work, these people spending their time and energy to promote that kind of propaganda."

Meanwhile, Liberal Leader Justin Trudeau vowed to criminalize blocking access to hospitals amid the protests, saying in a tweet: "There is no place for intimidation or threats at our hospitals and clinics."

NDP Leader Jagmeet Singh agreed it is wrong to protest at hospitals.

"No health-care worker, no patient, no one seeking health care should in any way be limited or have a barrier to getting the care they need," he said while campaigning in Sioux Lookout, Ont.

Conservative Leader Erin O'Toole also expressed frustration.

"This type of harassment and protest in front of hospitals is completely unacceptable," he said.

Past protests have centred on both public health measures and the prospect of proof-of-vaccination systems that would limit access to many public settings for those who have not been immunized against COVID-19.


British Columbia's system took effect on Monday, while Ontario's is set to launch on Sept. 22.


Quebec's rolled out earlier this month, Manitoba began issuing vaccine cards in June, and both Nova Scotia and Yukon have said proof-of-vaccination systems are in the works.


Demonstrators stood outside of Victoria Hospital in London, Ont., to protest the province's vaccine mandate. (James Chaarani/CBC)

Protesters are shown demonstrating in front of the Manitoba Legislative Assembly in Winnipeg on Monday afternoon. (Jaison Empson/CBC)


Protesters rally outside The Ottawa Hospital Civic Campus. (Francis Ferland/CBC)





Doug Ford 
@fordnation · [Follow](#)



The protests we're seeing outside of hospitals are selfish, cowardly and reckless. Our health care workers have sacrificed so much to keep us all safe during this pandemic. They don't deserve this kind of treatment — not now, not ever. Leave our health care workers alone.

2:14 PM · Sep 12, 2021 

 6.9K  See the latest COVID-19 information on Twitter

[Read 3.9K replies](#)

Justin Trudeau 

@JustinTrudeau · [Follow](#)

Officiel du gouvernement - Canada



There is no place for intimidation or threats at our hospitals and clinics. That's why we'll make it an offence to obstruct access to any building providing health services. We'll also make it an offence to intimidate/threaten any health care worker or anyone seeking treatment.

3:52 PM · Sep 13, 2021



 15K  Reply  Share this Tweet

[Read 1.7K replies](#)

Erin O'Toole 

@erinotoole · [Follow](#)



No one should be permitted to obstruct access to a hospital. If necessary, law enforcement should be deployed to prevent this.

1:18 PM · Sep 13, 2021



 3.8K  Reply  Share this Tweet

[Read 854 replies](#)

With files from The Canadian Press

This is Exhibit “C” referred in the Affidavit of Kristen Nagle
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

Fired London nurse helping organize anti-lockdown hospital protests

Cross-country hospital protests against vaccine passports and COVID-19 public health measures are planned for Monday, organized by a group led in part by two Ontario nurses – one from London – who travelled to Washington on the day of the infamous Jan. 6 Capitol riots.

Sep 13, 2021 • September 13, 2021 • 4 minute read • 144 Comments



Kristen Nagle. Photograph taken on Tuesday September 22, 2020. (Mike Hensen/The London Free Press)

Cross-country hospital protests against vaccine passports and COVID-19 public health measures are planned for Monday, organized by a group led in part by two Ontario nurses – one from London – who travelled to Washington on the day of the infamous Jan. 6 Capitol riots.

Story continues below

The protests, scheduled for cities from Victoria to St. John's and organized by a group calling itself Canadian Frontline Nurses, echo those that have rippled across Canada in recent weeks in response to government announcements of vaccine passports, which would limit the access

unvaccinated Canadians have to public spaces.

Their targets include London's Victoria Hospital.

Kristen Nagle and Sarah Choujounian, two of the organizers for the group, have both long been active in the protests against public-health measures during the COVID-19 pandemic and were present at a rally in Washington on Jan. 6, the same day pro-Donald Trump agitators stormed the Capitol building.

In November 2020, Nagle was charged for organizing rallies in violation of Ontario's public health measures. She was put on paid leave from her job at the London Health Sciences Centre for actions "not aligned" with her employer's values. An investigation into her conduct wrapped up by mid-January 2021, and [she was fired](#).

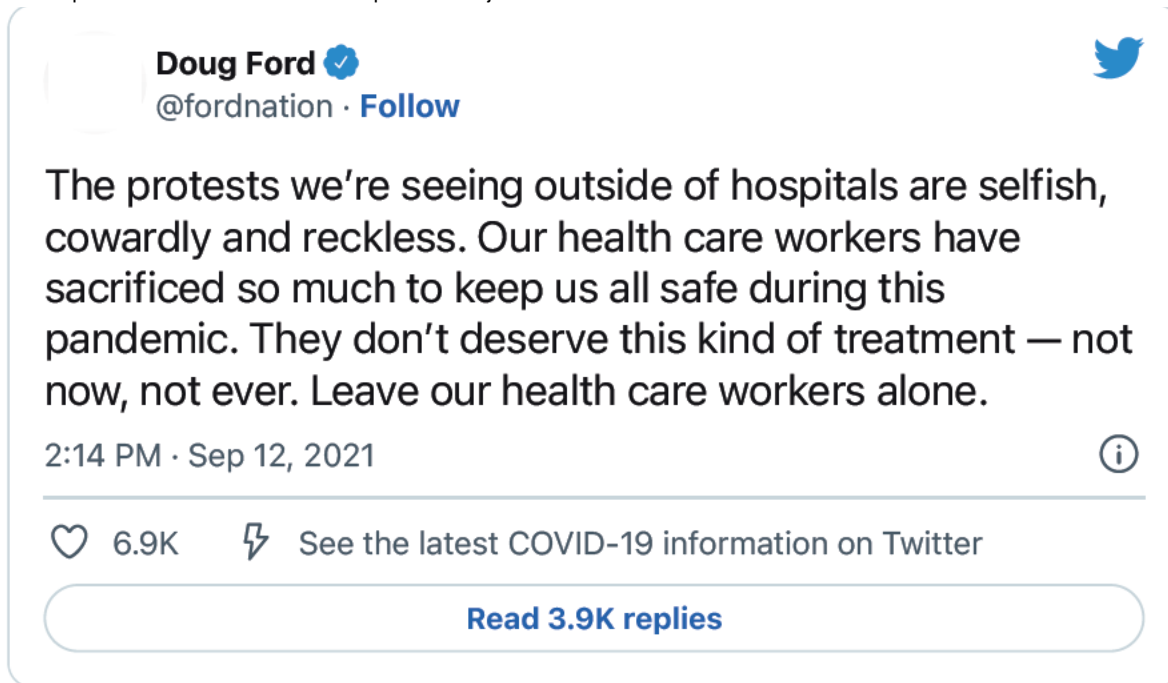
Story continues below

Nagle, a registered nurse since 2006, said at the D.C. rally nurses were being threatened for speaking out or holding contrary views but said that would not stop them standing up for the truth. She also slammed policies she said isolate new mothers at a critical time.

"We are sharing truth with you whatever the cost may be," Nagle said.

"Nurses, it is our time to rise."

Her bio on the Canadian Frontline Nurses website reads: "Kristen is passionate about children's health and empowering families to trust their bodies and immune systems, to support and not suppress symptoms and to live a more natural life in harmony with the Earth with full body sovereignty."



Story continues below

Choujounian was the founder of Nurses Against Lockdowns, which has since merged with Canadian Frontline Nurses. She has, according to her bio on the group's website, been fired from both her nursing jobs in Ontario.

Both women travelled to Washington last January for a rally organized by Global Frontline Nurses, an organization that claims there is no evidence that social distancing is helpful in reducing the spread of COVID-19 and that "lockdowns do not work," both positions widely disputed by public-health experts.

In Washington, Choujounian said she was fired from her nursing job for posting online about her beliefs about lockdowns, and said restrictions on visiting nursing homes are "crimes against humanity."

Story continues below

Choujounian and Nagle are also both under investigation by the College of Nurses of Ontario for their conduct. The college did not respond to a request

for comment on Sunday.

The National Post reached out to Canadian Frontline Nurses for comment on Sunday, but the organization did not respond by press time.

There have been protests around the country relating to vaccine passports in recent weeks, reinvigorating a movement that had, previously, held rallies across the country condemning mask mandates and lockdown measures taken in many provinces to curb the spread of COVID-19.

Last week, the Canadian Nursing Association issued a strongly worded statement condemning the protests, saying the protests "have stunned and saddened exhausted health-care workers."

Story continues below

"The reckless views of a handful of discredited people who identify as nurses have aligned in some cases with angry crowds who are putting public health and safety at risk," read a statement. "Their outlandish assertions about science would be laughable were they not so dangerous."

Sunday, Toronto Mayor John Tory also came out against the protests, writing on Twitter: "We all have a right to protest but abusing that right in order to harass people outside a hospital and spread misinformation about vaccines in the middle of the pandemic is unacceptable and beyond the pale."

News reports from across the country detail verbal and physical abuse from protesters during the last major round of protests, including reports that ambulances and patients struggled to get through thousands of demonstrators to get into hospitals.



Story continues below

On Sunday, Alberta Health Services said it is planning for the "increased" presence of protective services and police around a hospital when the protests occur Monday in order to "support staff and patients at the Royal Alexandra Hospital to feel safe when entering or leaving the hospital tomorrow."

Monday's protest, according to a Canadian Frontline Nurses Facebook post, are "more of a silent vigil where health care professionals and the general public are welcome to show their support for those against medical tyranny and to pay tribute to those affected by the measures put in place since last year."

The protests have escalated to the extent that the presidents of the Ontario Medical Association and the Canadian Medical Association penned a joint statement earlier this month saying the protests are "precluding access to much-needed health care settings and demoralizing health care workers."

"The health care workers who have worked tirelessly for months on end are being bullied and harassed for doing their jobs. This is wrong and unacceptable – full stop," the statement said.

With files from Tom Blackwell and The Canadian Press.

tdawson@postmedia.com

This is Exhibit “D” referred in the Affidavit of Kristen Nagle
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

The nurses who organized Vancouver's anti-vax protest aren't who you think they are

An organization claiming to represent the nurses of Canada were recently condemned by the Canadian Nurses Association

[Cameron Thomson](#) Sep 11, 2021 1:27 PM



The Canadian Frontline Nurses website was created shortly after the January 6 Capitol riots in Washington, D.C. Canadian Frontline Nurses/Facebook

An organization claiming to represent Canadian nurses which spreads dangerous misinformation about the coronavirus (COVID-19) were recently condemned by the national voice for healthcare workers.

Online, it may be easy to see the Canadian Frontline Nurses' (CFN) name

and logo and come under the impression that there really is a large subset of nurses fighting against the words and policies laid out by Canada's top health officials.

The organization's white nurse cap logo with its bright red maple leaf has been seen on posters and flyers promoting anti-vaccine rallies since the start of 2021. The group's most recent work includes the anti-vaccine/anti-government/freedom rally [held outside Vancouver General Hospital](#) and Vancouver City Hall earlier this month.

However, in speaking with the [Canadian Nurses Association](#) which has represented nurses across Canada for nearly 100 years, *Vancouver Is Awesome* has found the use of the word "nurse" in the bios of CFN's founders and the group's name itself lends a misplaced impression of credibility.

Canadian Frontline Nurses 🇨🇦

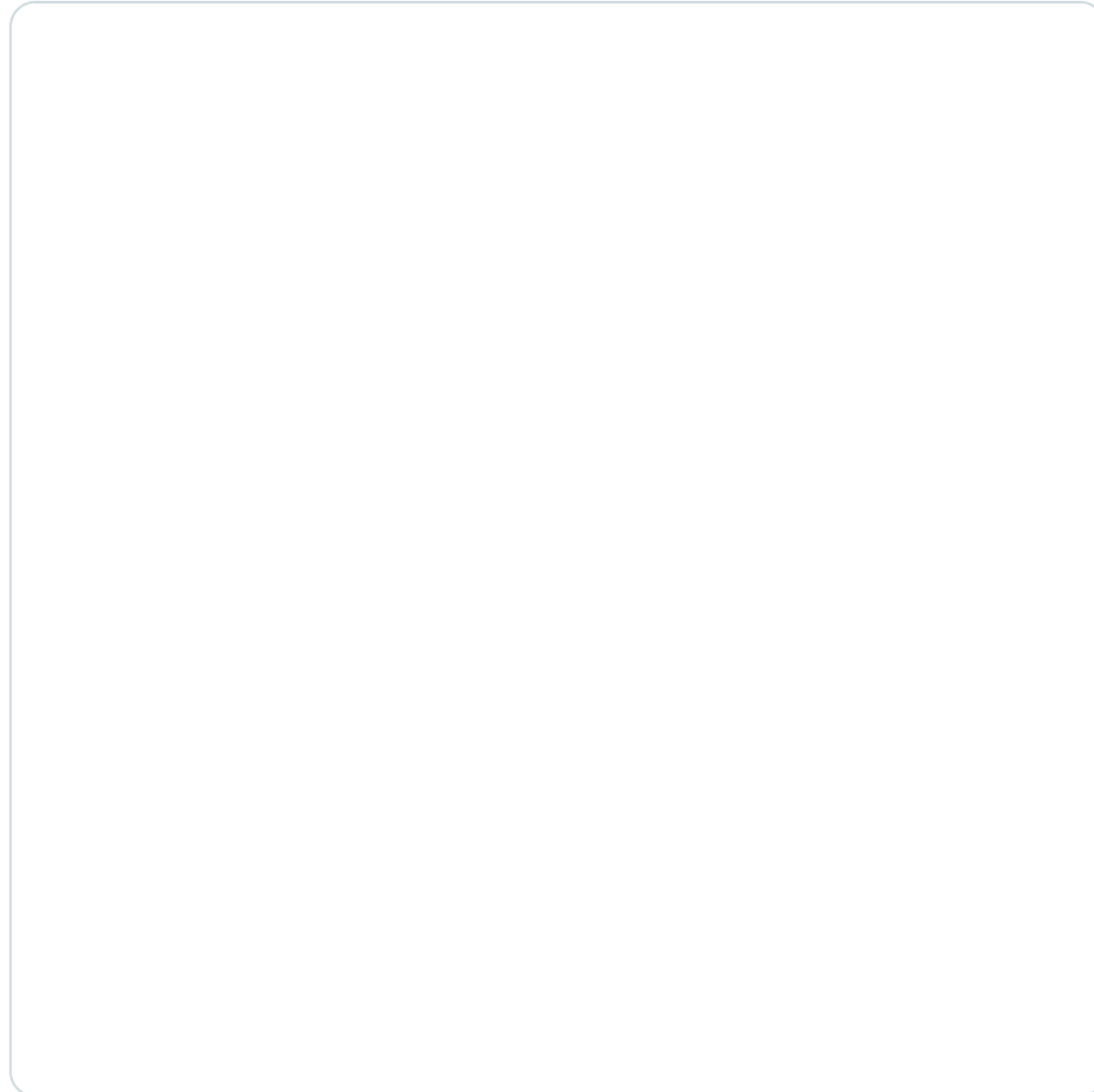
@NursesCanadian · [Follow](#)



Here we go again!!!!

Uniting at hospitals to show our support for medical
freedom 🦋, pro choice & informed consent 📖...

Let's do this 🙌



8:29 PM · Sep 8, 2021



88



Reply



Share this Tweet

[Read 64 replies](#)

V.I.A. has also found that the group is relatively new, made up of some fired nurses, and represents a small minority of Canada's healthcare workers. It has also been widely denounced by those working with COVID-19 patients across the country.

Who are Canadian Frontline Nurses?

Canadian Frontline Nurses is an offshoot of [Global Frontline Nurses](#), which predates CFN by one year. The foundations for CFN were built mainly on social media by women like Kristen Nagle, a neonatal ICU nurse and Sarah Choujounian, a registered practical nurse both from Ontario.

Before the pandemic, Kristen Nagle's [Instagram](#) was filled with photos of her children, healthy recipe ideas and dieting tips. But on Aug. 10, 2020, Nagle made one of her first posts about the pandemic, in which she [likened the use of masks and social distancing to Munchhousens](#), arguing the mentality created by these measures was making more people sick than the virus was.

undefined

Over the next few months, she [spoke at city council meetings](#) spreading misinformation about masks and went on to [attend, organize and speak at anti-mask rallies](#) in Ontario. For these actions, [Nagle was eventually fired from her job](#), according to the CBC.

Still, her protests continued into the start of 2021, when she and Sarah Choujounian [met at Pearson Airport](#) awaiting a flight to Washington, D.C.

Three months before that flight, Choujounian made the first post to the Instagram account [nursesagainstockdowns](#) which merged with the [Canadian Frontline Nurses Instagram](#) account in May of this year. During that time she too attended and spoke at anti-mask and anti-vaccine rallies in

Ontario.

The pair, like-minded in their cause, was headed to Washington to unite with the Global Frontline Nurses (GFN) and partake in a Freedom Health Summit on Jan. 6.

The January 6 Capitol Riot

Nagle and Choujounian, along with other members of the GFN movement, [met on the steps of Capitol Hill](#) hours before thousands of supporters of former U.S. President Donald Trump broke into the Capitol to try to stop the presidential electoral vote count.

In the aftermath, the College of Nurses of Ontario confirmed to the Canadian Press that both Nagle and Choujounian were [already under investigation](#) for speaking at anti-mask rallies.

Neither woman is reported to have been part of the pro-Donald Trump mob that stormed the Capitol.

undefined

Four days after the Capitol riots, the CFN [Facebook page](#) was created, sharing a similar logo to that of the Global Frontline Nurses. Around the same time, a [website for CFN](#) was also created, listing Choujounian as one of the group's founding members.

According to Choujounian's bio she, like Nagle, was fired from both her nursing jobs at care homes in Ontario.

According to the website, three more are listed as members of the organization. Kristal Pitter, a RN who is still entitled to practice with no restrictions but is no longer employed as a nurse, according to the [College of](#)

[Nurses of Ontario](#). Jessica Faraone, a RN from Quebec is also entitled to practice but [is no longer doing so](#). Finally, there is Nordia German, another RN from Quebec who according to the [Order of Nurses of Quebec](#) is still entitled to practice until 2022.



Nordia German, Kristen Nagle, Sarah Choujounian and Kristal Pitter speaking at a anti-vaccine rally. By Canadian Frontline Nurses/Facebook

A loud minority

Michael Villeneuve is the CEO of the Canadian Nurses Association (CNA) and speaking from his Ontario home on Friday (Sept. 10), he laid out exactly why Canadian Frontline Nurses represents a small but loud minority.

Villeneuve explained the CNA has been keeping tabs on CFN because the group doesn't represent the values of nursing.

"It's dangerous to put that title out there, meaning a nurse title, which obviously carries meaning for the public and then misrepresents truth or science," Villeneuve said.



Michael Villeneuve is the CEO of the Canadian Nurses Association says Canadian Frontline Nurses represent only a small minority of Canadian nurses. By Michael Villeneuve/Twitter

With protests held by CFN at healthcare centres across the country in recent weeks, the CNA released a scathing letter directed to the protest's participants and organizers titled ["Enough is enough."](#)

"The reckless views of a handful of discredited people who identify as nurses have aligned in some cases with angry crowds who are putting public health and safety at risk. They have drawn in anti-science, anti-mask, anti-vaccine, anti-public health followers whose beliefs align with theirs. For some reason they would have us believe that millions of the best educated health scientists, public health experts, physicians and nurses globally have

all missed something they have not. Their outlandish assertions about science would be laughable were they not so dangerous."

'I've never seen nurses and doctors so tired'

The letter goes on to say anti-public health disinformation threatens to confuse a tired and bewildered public by misrepresenting personal ideology as facts, and science as conspiracy. The letter also attempts to assure Canadians the vast majority of Canada's nurses are duty-bound to use science and evidence to evaluate the care they give.

Villeneuve says in any group, including the hundreds of thousands of nurses across Canada, there are bound to be a few people that don't agree with the rest.

"The problem is when the group is 448,000, half a percent is still a couple thousand people, and they could be very vocal using social media," he explains.

In Villeneuve's 40-plus years in the healthcare industry, he said he has never seen the public's vitriol take such a toll on healthcare workers.

"I've never seen nurses and doctors so tired," he said. "So shaken, and shocked by fellow Canadians lining up and yelling at them."

To sum up, Villeneuve says this about those who claim to represent Canada's nurses while also spreading misinformation about a global pandemic.

"They represent everything that we don't."

This is Exhibit “E” referred in the Affidavit of Kristen Nagle
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

The nurses behind Vancouver's anti-vax protests

Anyone who has seen the Canadian Frontline Nurses' white nurse cap logo with its bright red cross on posters and flyers promoting anti-vaccine rallies might be wondering how this group — whose name suggests that it represents nurses — came to be fighting

Sep 14, 2021 6:00 AM



An ambulance passes through a crowd of people protesting COVID-19 vaccine passports and mandatory vaccinations for health-care workers in Vancouver on Sept. 1, 2021. The protest began outside Vancouver General Hospital and police estimated the crowd gathered to be as many as 5,000 people. THE CANADIAN PRESS/Darryl

Dyck

Anyone who has seen the Canadian Frontline Nurses' white nurse cap logo with its bright red cross on posters and flyers promoting anti-vaccine rallies might be wondering how this group — whose name suggests that it represents nurses — came to be fighting policies laid out by Canada's top health officials.

The relatively new group helped organize an anti-vaccine rally held outside Vancouver General Hospital and Vancouver City Hall this month.

With a membership including some fired nurses, Canadian Frontline Nurses actually represents a small minority of Canada's health-care workers and has been widely denounced by those working with COVID-19 patients across the country.

Who are Canadian Frontline Nurses?

Canadian Frontline Nurses is an offshoot of Global Frontline Nurses, which predates CFN by one year. The foundations for CFN were built mainly on social media by women like Kristen Nagle, a neonatal ICU nurse, and Sarah Choujounian, a registered practical nurse, both from Ontario.

Before the pandemic, Kristen Nagle's Instagram was filled with photos of her children, healthy recipe ideas and dieting tips. But on Aug. 10, 2020, Nagle made one of her first posts about the pandemic, in which she argued public health measures were creating an atmosphere that was making more people sick than the virus was.

Over the next few months, she spoke at city council meetings spreading misinformation about masks, and went on to attend, organize and speak at anti-mask rallies in Ontario. For these actions, Nagle was eventually fired from her job, according to the CBC.

Still, her protests continued into the start of 2021, when she and Sarah Choujounian met at Pearson Airport awaiting a flight to Washington, D.C.

Three months before that flight, Choujounian made the first post to the Instagram account nursesagainstockdowns, which merged with the Canadian Frontline Nurses Instagram account in May of this year. During that time, she, too, attended and spoke at anti-mask and anti-vaccine rallies in Ontario.

When they met, the two were headed to Washington to unite with the Global Frontline Nurses and participate in a Freedom Health Summit on Jan. 6.

Nagle and Choujounian, along with other members of the GFN movement, met on the steps of Capitol Hill hours before thousands of supporters of former U.S. president Donald Trump broke into the Capitol to try to stop the presidential electoral vote count.

In the aftermath, the College of Nurses of Ontario confirmed to the Canadian Press that both Nagle and Choujounian were already under investigation for speaking at anti-mask rallies.

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The website indicates the organization has three more members: Kristal

Pitter, a RN who is still entitled to practise with no restrictions but is no longer employed as a nurse, according to the College of Nurses of Ontario; Jessica Faraone, an RN from Quebec is also entitled to practise but is no longer doing so; and Nordia German, another RN from Quebec, who, according to the Order of Nurses of Quebec, is entitled to practise until 2022.

A loud minority

Michael Villeneuve, CEO of the Canadian Nurses Association, which has represented nurses across Canada for nearly 100 years, says the Canadian Frontline Nurses represents a loud but small minority.

He said the CNA has been keeping tabs on Canadian Frontline Nurses because the group doesn't represent the values of nursing.

"It's dangerous to put that title out there, meaning a nurse title, which obviously carries meaning for the public and then misrepresents truth or science," said Villeneuve, whose group released a scathing letter directed at participants and organizers of the recent anti-vaccine-card protests.

Titled "Enough is enough," it says: "The reckless views of a handful of discredited people who identify as nurses have aligned in some cases with angry crowds who are putting public health and safety at risk. They have drawn in anti-science, anti-mask, anti-vaccine, anti-public health followers whose beliefs align with theirs. For some reason they would have us believe that millions of the best educated health scientists, public health experts, physicians and nurses globally have all missed something they have not. Their outlandish assertions about science would be laughable were they not so dangerous."

The letter says anti-public-health disinformation threatens to confuse a tired

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"I've never seen nurses and doctors so tired," he said. "So shaken, and shocked by fellow Canadians lining up and yelling at them."

Villeneuve says those who claim to represent Canada's nurses while also spreading misinformation about a global pandemic "represent everything that we don't."

This is Exhibit “F” referred in the Affidavit of Kristen Nagle
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner



**COLLEGE OF NURSES
OF ONTARIO**
**ORDRE DES INFIRMIÈRES
ET INFIRMIERS DE L'ONTARIO**

**THE STANDARD OF CARE.
L'EXCELLENCE EN SOINS**

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Téléphone 416 928-0900
Sans frais (Canada) 1 800 387-5526
Télécopieur 416 928-6507

**Investigation under the *Health Professions Procedural Code*
Regarding KRISTEN NAGLE, #06278510**

Appointment of Investigator

I, Anne L. Coghlan, Executive Director and CEO of the College of Nurses of Ontario, appoint Alexandra Peros to inquire into and examine the conduct or actions of Kristen Nagle, pursuant to sections 75 to 79 of the *Health Professions Procedural Code*, to ascertain whether Kristen Nagle has committed an act of professional misconduct or is incompetent in respect of:

- Demonstration of knowledge, skill and judgment
- Professional conduct outside of the workplace
- Fulfilling reporting obligations to the College of Nurses

The Inquiries, Complaints and Reports Committee of the College of Nurses of Ontario has approved this appointment under subsection 75(1)(a) of the *Health Professions Procedural Code*.

A copy of sections 75 - 79 and subsection 93(1) of the *Health Professions Procedural Code* is attached to this appointment.

October 7, 2021

Date

Anne L. Coghlan, RN, MScN
Executive Director and CEO
College of Nurses of Ontario

Sections 75-79 and ss. 93(1) of the *Health Professions Procedural Code*

Investigators

75. (1) The Registrar may appoint one or more investigators to determine whether a member has committed an act of professional misconduct or is incompetent if,

(a) the Registrar believes on reasonable and probable grounds that the member has committed an act of professional misconduct or is incompetent and the Inquiries, Complaints and Reports Committee approves of the appointment;

(b) the Inquiries, Complaints and Reports Committee has received information about a member from the Quality Assurance Committee under paragraph 4 of subsection 80.2 (1) and has requested the Registrar to conduct an investigation; or

(c) the Inquiries, Complaints and Reports Committee has received a written complaint about the member and has requested the Registrar to conduct an investigation. 2007, c. 10, Sched. M, s. 53.

Emergencies

(2) The Registrar may appoint an investigator if,

(a) the Registrar believes on reasonable and probable grounds that the conduct of the member exposes or is likely to expose his or her patients to harm or injury, and that the investigator should be appointed immediately; and

(b) there is not time to seek approval from the Inquiries, Complaints and Reports Committee. 2007, c. 10, Sched. M, s. 53.

Report

(3) Where an investigator has been appointed under subsection (2), the Registrar shall report the appointment of the investigator to the Inquiries, Complaints and Reports Committee within five days. 2007, c. 10, Sched. M, s. 53.

Application of *Public Inquiries Act, 2009*

76. (1) An investigator may inquire into and examine the practice of the member to be investigated and section 33 of the *Public Inquiries Act, 2009* applies to that inquiry and examination. 2009, c. 33, Sched. 6, s. 84.

Reasonable inquiries

(1.1) An investigator may make reasonable inquiries of any person, including the member who is the subject of the investigation, on matters relevant to the investigation. 2009, c. 6, s. 1.

Idem

(2) An investigator may, on the production of his or her appointment, enter at any reasonable time the place of practice of the member and may examine anything found

there that is relevant to the investigation. 1991, c. 18, Sched. 2, s. 76 (2); 2007, c. 10, Sched. M, s. 54.

Obstruction prohibited

(3) No person shall obstruct an investigator or withhold or conceal from him or her or destroy anything that is relevant to the investigation. 1991, c. 18, Sched. 2, s. 76 (3).

Member to co-operate

(3.1) A member shall co-operate fully with an investigator. 2009, c. 6, s. 1.

Conflicts

(4) This section applies despite any provision in any Act relating to the confidentiality of health records. 1991, c. 18, Sched. 2, s. 76 (4).

Entries and searches

77. (1) A justice of the peace may, on the application of the investigator made without notice, issue a warrant authorizing an investigator to enter and search a place and examine any document or thing specified in the warrant if the justice of the peace is satisfied that the investigator has been properly appointed and that there are reasonable and probable grounds established upon oath for believing that,

(a) the member being investigated has committed an act of professional misconduct or is incompetent; and

(b) there is something relevant to the investigation at the place. 2007, c. 10, Sched. M, s. 55.

Hours of execution

(2) A warrant issued under subsection (1) may be executed only between 8 a.m. and 8 p.m. unless the warrant specifies otherwise. 2007, c. 10, Sched. M, s. 55.

Application for dwelling

(2.1) An application for a warrant under subsection (1) to enter a dwelling shall specifically indicate that the application relates to a dwelling. 2007, c. 10, Sched. M, s. 55.

Assistance and entry by force

(3) An investigator entering and searching a place under the authority of a warrant issued under subsection (1) may be assisted by other persons and may enter a place by force. 1991, c. 18, Sched. 2, s. 77 (3).

Investigator to show identification

(4) An investigator entering and searching a place under the authority of a warrant issued under subsection (1) shall produce his or her identification, on request, to any person at the place. 1991, c. 18, Sched. 2, s. 77 (4).

Copying of documents and objects

78. (1) An investigator may copy, at the College's expense, a document or object that an investigator may examine under subsection 76 (2) or under the authority of a warrant issued under subsection 77 (1).

Removal for documents and objects

- (2) An investigator may remove a document or object described in subsection (1) if,
- (a) it is not practicable to copy it in the place where it is examined; or
 - (b) a copy of it is not sufficient for the purposes of the investigation.

Return of documents and objects or copies

- (3) If it is practicable to copy a document or object removed under subsection (2), the investigator shall,
- (a) if it was removed under clause (2) (a), return the document or object within a reasonable time; or
 - (b) if it was removed under clause (2) (b), provide the person who was in possession of the document or object with a copy of it within a reasonable time.

Copy as evidence

(4) A copy of a document or object certified by an investigator to be a true copy shall be received in evidence in any proceeding to the same extent and shall have the same evidentiary value as the document or object itself.

Definition

- (5) In this section,
- "document" means a record of information in any form and includes any part of it. 1991, c. 18, Sched. 2, s. 78.

Report of investigation

- 79.** The Registrar shall report the results of an investigation to,
- (a) the Inquiries, Complaints and Reports Committee if the investigator was appointed under clause 75 (1) (a) or (b) or subsection 75 (2);
 - (b) the Inquiries, Complaints and Reports Committee if the investigator was appointed under clause 75 (1) (c), at the request of the Inquiries, Complaints and Reports Committee; or
 - (c) the Board if the investigator was appointed under clause 75 (1) (c) by the Board exercising the Registrar's powers under subsection 28 (6). 2007, c. 10, Sched. M, s. 56.

Offences

93. (1) Every person who contravenes an order made under subsection 7 (3) or section 45 or 47, or who contravenes subsection 76 (3), 82 (2) or (3), 85.2 (1), 85.5 (1) or (2) or 85.14 (2) or section 92.1 is guilty of an offence and on conviction is liable,

(a) in the case of an individual to a fine of not more than \$25,000 for a first offence and not more than \$50,000 for a second or subsequent offence; or

(b) in the case of a corporation to a fine of not more than \$50,000 for a first offence and not more than \$200,000 for a second or subsequent offence. 2007, c. 10, Sched. M, s. 72; 2009, c. 26, s. 24 (17).

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

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**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

AFFIDAVIT OF SARAH CHOUJOUNIAN

I, Sarah Choujounian, of the City of Mississauga, in the Regional Municipality of Peel, make oath and say:

1. I am a Plaintiff in these proceedings and a member of Canadian Frontline Nurses. As such I have knowledge of the matters to which I hereinafter depose. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of my information and belief. All of the information I have deposed to I verily believe to be true.
2. I am a registered nurse. I am entitled to practice with no restrictions.
3. I obtained my Practical Nursing Diploma from Humber College in 2004.

4. I am not presently employed as a nurse, and have not been employed as a nurse since I was terminated from my position with S.R.T. MedStaff on January 14, 2021.

5. I am the co-founder of Canadian Frontline Nurses. Kristen Nagle is the other co-founder of Canadian Frontline Nurses. We started Canadian Frontline Nurses in January of 2021.

6. I did not travel to Washington, D.C. on January 6, 2021 or any other date to be part of Trump-inspired protests.

7. I travelled to Washington, D.C. on January 6, 2021 to partake in a health and freedom summit organized by Global Frontline Nurses which was being held near the United States Supreme Court.

8. I had no foreknowledge that President Trump would make a speech to his supporters in Washington D.C. on January 6, 2021.

9. I was not aware that the joint session of Congress was scheduled to count the electoral college votes on January 6, 2021.

10. I had no foreknowledge that there would be an attack on the Capitol Building in Washington D.C. on January 6, 2021.

11. I did not invade the Capitol Building or any other place where the United States Congress conducts business on January 6, 2021 or on any other date.

12. I did not choose to participate in a “pro-Trump” or “Trump-inspired” rally. I was however within the vicinity of the Capitol on January 6, 2021 and personally observed a large crowd of people forming in front of the Capitol Building on that date.

13. I did not join a MAGA mob at the White House.

14. I was not fired from my position with S.R.T. MedStaff for joining a MAGA mob at the White House.

15. The reason S.R.T. MedStaff provided for my termination was that I had publicly advocated against healthcare measures mandated by Public Health, which S.R.T. MedStaff viewed as negatively impacting on its organization. S.R.T. MedStaff’s termination letter explicitly sets out that the decision to terminate my employment was unrelated to the fact that I was in the vicinity of the Capitol. Attached and marked as Exhibit “A” is a copy of a letter dated January 14, 2021 from S.R.T. MedStaff setting out the reasons for my termination from that position.

16. Canadian Frontline Nurses was incorporated under the *Canada Not-for-profit Corporations Act* on April 6, 2021. A copy of the Certificate of Incorporation for Canadian Frontline Nurses is attached hereto and marked as Exhibit “B”.

17. Canadian Frontline Nurses organized a number of rallies to take place across the country on September 1, 2021. The rallies that were organized by Canadian Frontline Nurses took place at the following locations on September 1, 2021:

- (a) Victoria – Victoria Hospitals Foundation
- (b) Vancouver – Vancouver General Hospital
- (c) Kamloops – 311 Columbia Street
- (d) Calgary – Foothills Medical Centre
- (e) Edmonton – Royal Alexandra Hospital
- (f) Saskatoon – City Hospital
- (g) Winnipeg – Health Sciences Centre
- (h) Toronto – UHN
- (i) London – LHSC Victoria Campus
- (j) Barrie – RVH
- (k) Ottawa – The Ottawa Hospital
- (l) Sudbury – Health Sciences Centre North
- (m) Montreal – Centre Hospitalier de l'Université de Montréal (CHUM)
- (n) Quebec City – Hôtel-Dieu de Québec
- (o) Moncton – George Dumont
- (p) Charlottetown – The Queen Elizabeth Hospital
- (q) Halifax – Queen Elizabeth II Health Sciences Centre
- (r) Saint John – Regional Hospital

18. My main role in organizing the Canadian Frontline Nurses September 1, 2021 rallies was to spread awareness of them through various social media platforms.

19. A printout of a digital flyer that was broadcast by Canadian Frontline Nurses on various social media channels relating to the September 1, 2021 rallies is attached hereto and marked as Exhibit “C”.

20. I understand, from my review of various social media posts prior to September 1, 2021, and my reading of stories reported in the media after September 1, 2021, that a protest was held in front of a hospital in Nanaimo, British Columbia on September 1, 2021. Neither Canadian Frontline Nurses nor I were involved in organizing the protest in Nanaimo and I have no personal knowledge of what may have occurred during this protest on September 1, 2021.

21. Canadian Frontline Nurses decided to organize protests on September 1, 2021 as we had become aware that hospitals across Canada were in the process of implementing, or had already implemented, policies requiring its healthcare workers to provide proof of COVID-19 vaccination if they wished to maintain active employment at the hospital.

22. Canadian Frontline Nurses stands for medical and nursing ethics and the principles of medical freedom and informed and uncoerced consent.

23. Most of our membership, myself included, do not believe that the evidence supports that COVID-19 vaccines are effective in preventing transmission.

24. Canadian Frontline Nurses and I felt that it was appropriate to protest in the vicinity of hospitals for two reasons. First, we understood that the policies that were being instituted by many hospitals across the country forced fellow nurses and healthcare workers who were not willing to voluntarily receive a COVID-19 vaccine to “choose” between continuing their important work and receiving a COVID-19 vaccine that they did not want to receive. It was our belief that protesting in the vicinity of the hospitals would bring awareness to the difficult position that the hospital policies created for nurses who did not want to receive a COVID-19 vaccine yet wished to continue their work. Second, we wished to express our solidarity with the nurses who worked in the hospitals that found themselves in this difficult position.

25. On September 1, 2021, I participated in the rally that took place in the vicinity of Centre Hospitalier de l’Université de Montréal (the “Montreal Rally.”)

26. I am informed through my discussions with Nordia German, a member of Canadian Frontline Nurses who also participated in the Montreal Rally, that she reached out to the Montreal Police in advance of the Montreal Rally to advise them of the planned Montreal Rally in the hope that this awareness would enable the police to ensure that the peace was maintained, and that none of the roadways leading to the hospital would be impeded by the protest.

27. Montreal police were present at the Montreal Rally. To the best of my knowledge, no individuals were detained, arrested, or charged as a result of their participation in the Montreal Rally.

28. On September 1, 2021, I observed and spoke to a few nurses who emerged from the Hospital to join the Montreal Rally. I also witnessed and heard other individuals who emerged from the hospital expressed that they were not supportive of the Montreal Rally.

29. I did not harass, threaten, assault, or impede anyone at the Montreal Rally.

30. Throughout my participation in the Montreal Rally, I did not observe any patients, healthcare workers, or any other individuals being impeded from accessing the hospital.

31. I did not observe anyone being assaulted at the Montreal Rally.

32. I did not observe anyone who formed part of the Montreal Rally harass, threaten, or scream insults at healthcare workers. I did however observe individuals who emerged from the hospital scream insults at us.

33. Canadian Frontline Nurses and I received hateful messages and threats of physical harm in the wake of the September 1, 2021 protests and the Canadian Nurses Association and Together News publications.

34. On September 13, 2021 my personal address was shared by an unknown individual on social media. I, and other members of Canadian Frontline Nurses, received numerous death threats in and around this same time.

35. I verily believe that my personal and professional reputation have been adversely affected by the Canadian Nurses Association and the Together News publications that are set out in the Statement of Claim. The Canadian Nurses Association and Together News publications falsely characterize me as a discredited, dangerous, and unprofessional person. These publications falsely associate me with protests where healthcare workers were being harassed and assaulted. The Together News publication falsely associates me with protests that impeded healthcare workers from doing their jobs and interfered with patients receiving the care that they needed. The Together News article suggests that I was part of a right-wing mob who attacked the US Capitol Building.

36. On October 7, 2021, an investigator was appointed by the College of Nurses of Ontario (“CNO”) to ascertain whether I have committed an act of professional misconduct or if I am incompetent in respect of demonstration of knowledge, skill and judgment, use of a protected title, and professional conduct outside of the workplace. A copy of the Appointment of Investigator form dated October 7, 2021 is attached hereto and marked as Exhibit “D”.

37. I am aware, through my review of the confidential disclosure package that was sent by the CNO on June 10, 2022 relating to the CNO’s October 7, 2021 investigation, that there have been complaints from the public arising from my participation and Canadian Frontline Nurses’ participation in the September 1, 2021 protests.

38. I am also aware, through my review of the confidential disclosure package, that the Canadian Nurses Association's September 9, 2021 publication formed part of the basis of some of the complaints made to the CNO concerning me.

39. The Canadian Nurses Association and Together News publications, and the damage that these publications have caused to my reputation, have caused me significant mental distress.

Sworn or Affirmed before me: ☐ in person OR ☒ by video conference

by Sarah Choujounian of the City of)
Mississauga, in the Regional Municipality)
of Peel, before me at the City of Toronto)
on July 14, 2022 in accordance with O.)
Reg. 431/20 Administering Oath or)
Declaration Remotely.)

Commissioner for Taking Affidavits)

)

Alexander Boissonneau-Lehner


Sarah Choujounian

This is Exhibit “A” referred in the Affidavit of Sarah Choujounian
sworn July 14, 2022.

A handwritten signature in black ink, appearing to read 'ALEX', is positioned above a horizontal line.

Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

S·R·T·MedStaff

January 14, 2021

DELIVERED BY COURIER AND REGULAR MAIL

Sarah Choujounian
7294 Lancaster Ave.
L4T 2L7

Re: Your Employment with S.R.T. Med-Staff

This is to advise that your employment with S.R.T. Med-Staff is terminated, effective immediately, for cause.

It has recently come to our attention that you have been engaged in off-duty conduct which is fundamentally contrary to your continued employment with our organization.

You have acknowledged that you are part of the Global Frontline Network and that you travelled to Washington to speak on at one of the organization's events.

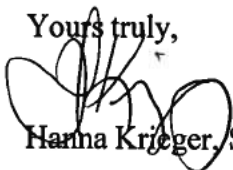
Both at that event and others you have publicly sought to undermine confidence in the healthcare system in relation to the care and treatment of people with COVID-19. You have also publicly advocated against healthcare measures mandated by Public Health (including the wearing of masks).

Through your registration with the College of Nurses of Ontario you are publicly associated with your employment at S.R.T. Med-Staff. Your public activities have negatively impact on our organization and your employment is therefore terminated.

Your Record of Employment, as well as any outstanding wages that may be owed to you as of today's date, will be provided to you in due course.

Given your comments in our call with you we want to be clear that this decision is unrelated to whether or not you chose to attend a 'pro-Trump rally' and we accept that you were in the vicinity and went to the Capitol because of curiosity about the events taking place there. This decision is unrelated to the nature of that event.

Yours truly,



Hanna Krieger, Sr. Manager Client Services

cc. Carolyn Acton, VP Patient Services and Operations

This is Exhibit “B” referred in the Affidavit of Sarah Choujounian
sworn July 14, 2022.

A handwritten signature in black ink, appearing to read 'A. Boissonneau-Lehner', written over a horizontal line.

Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

Certificate of Incorporation

Canada Not-for-profit Corporations Act

Certificat de constitution

Loi canadienne sur les organisations à but non lucratif

Canadian Frontline Nurses

Corporate name / Dénomination de l'organisation

1290156-1

Corporation number / Numéro de
l'organisation

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the *Canada Not-for-profit Corporations Act*.

JE CERTIFIE que l'organisation susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la *Loi canadienne sur les organisations à but non lucratif*.



Raymond Edwards

Director / Directeur

2021-04-06

Date of Incorporation (YYYY-MM-DD)
Date de constitution (AAAA-MM-JJ)

Form 4001
Articles of Incorporation
Canada Not-for-profit Corporations
Act (NFP Act)

Formulaire 4001
Statuts constitutifs
Loi canadienne sur les
organisations à but non lucratif
(Loi BNL)

1	Corporate name Dénomination de l'organisation Canadian Frontline Nurses
2	The province or territory in Canada where the registered office is situated La province ou le territoire au Canada où est maintenu le siège ON
3	Minimum and maximum number of directors Nombres minimal et maximal d'administrateurs Min. 1 Max. 10
4	Statement of the purpose of the corporation Déclaration d'intention de l'organisation To unite nurses across Canada and bring the ethics back into healthcare.
5	Restrictions on the activities that the corporation may carry on, if any Limites imposées aux activités de l'organisation, le cas échéant None
6	The classes, or regional or other groups, of members that the corporation is authorized to establish Les catégories, groupes régionaux ou autres groupes de membres que l'organisation est autorisée à établir See attached schedule / Voir l'annexe ci-jointe
7	Statement regarding the distribution of property remaining on liquidation Déclaration relative à la répartition du reliquat des biens lors de la liquidation See attached schedule / Voir l'annexe ci-jointe
8	Additional provisions, if any Dispositions supplémentaires, le cas échéant None
9	Declaration: I hereby certify that I am an incorporator of the corporation. Déclaration : J'atteste que je suis un fondateur de l'organisation.

Name(s) - Nom(s)

Original Signed by - Original signé par

Kristen Marie Nagle

Kristen Marie Nagle

Kristen Marie Nagle

Sarah Anahid Choujounian

Sarah Anahid Choujounian

Sarah Anahid Choujounian

A person who makes, or assists in making, a false or misleading statement is guilty of an offence and liable on summary conviction to a fine of not more than \$5,000 or to imprisonment for a term of not more than six months or to both (subsection 262(2) of the NFP Act)

La personne qui fait une déclaration fausse ou trompeuse, ou qui aide une personne à faire une telle déclaration, commet une infraction et encourt, sur déclaration de culpabilité par procédure sommaire, une amende maximale de 5 000 \$ et un emprisonnement maximal de six mois ou l'une de ces peines (paragraphe 262(2) de la Loi BNL)

You are providing information required by the NFP Act. Note that both the NFP Act and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la Loi BNL. Il est à noter que la Loi BNL et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

Schedule / Annexe

Classes of Members / Catégories de membres

The corporation is authorized to establish Class A members and Class B members as follows:

- (1) The Class A members shall be entitled to receive notice of and to attend all meetings of the members of the Corporation and each Class A member shall have one (1) vote at each such meeting, except for meetings at which only members of another class are entitled to vote separately as a class.
- (2) Except as otherwise provided by the Canada Not-for-Profit Corporations Act, S.C. 2009, c.23 the Class B members shall not be entitled to receive notice of, attend or vote at meetings of the members of the Corporation.

Schedule / Annexe

Distribution of Property on Liquidation / Répartition du reliquat des biens lors de la liquidation

Any property remaining on liquidation of the Corporation, after discharge of liabilities, shall be distributed to one or more qualified donees within the meaning of subsection 248(1) of the Income Tax Act.

This is Exhibit “C” referred in the Affidavit of Sarah Choujounian
sworn July 14, 2022.



Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner

CANADA WIDE PROTEST

HEALTH FREEDOM



09.01.21 • 1PM

STAND UP FOR FREEDOM NOW OR LOSE EVERYTHING

LOCATIONS

BC

Victoria - Victoria Hospitals Foundation
Vancouver - Vancouver General Hospital
Kamloops - 311 Columbia St.

Alberta

Calgary - Foothills Medical Centre
Edmonton - Royal Alexandra Hospital

Saskatchewan

Saskatoon - City Hospital

Manitoba

Winnipeg - Health Sciences Centre

Ontario

Toronto - UHN
London - LHSC Victoria Campus
Barrie - RVH
Ottawa - The Ottawa Hospital
Sudbury - Health Sciences Centre North

Quebec

Montreal - Centre Hospitalier de
l'Université de Montréal (CHUM)
Quebec City - Hôtel-Dieu de Québec

New Brunswick

Moncton - George Dumont

PEI

Charlottetown - The Queen Elizabeth
Hospital

Nova Scotia

Halifax - Queen Elizabeth II Health
Sciences Centre

Newfoundland

Saint John - Regional Hospital

**VAXXED OR
UNVAXXED
MASKED OR
UNMASKED**

**ALL ARE
WELCOME**

IT'S TIME!!

**STAND TOGETHER
REJECT THE
TYRANNY OF
MANDATORY
VACCINES**

This is Exhibit “D” referred in the Affidavit of Sarah Choujounian
sworn July 14, 2022.

A handwritten signature in black ink, appearing to read 'A. Boissonneau-Lehner', written over a horizontal line.

Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner



**COLLEGE OF NURSES
OF ONTARIO**
**ORDRE DES INFIRMIÈRES
ET INFIRMIERS DE L'ONTARIO**

**THE STANDARD OF CARE.
L'EXCELLENCE EN SOINS**

101 Davenport Road, Toronto, Ontario
Canada M5R 3P1 www.cno.org
Telephone 416 928-0900
Toll Free (Canada) 1 800 387-5526
Facsimile 416 928-6507

101, chemin Davenport, Toronto (Ontario)
Canada M5R 3P1 www.cno.org
Téléphone 416 928-0900
Sans frais (Canada) 1 800 387-5526
Télécopieur 416 928-6507

**Investigation under the *Health Professions Procedural Code*
Regarding SARAH A CHOUJOUNIAN-ABULU, #JD83453**

Appointment of Investigator

I, Anne L. Coghlan, Executive Director and CEO of the College of Nurses of Ontario, appoint Alexandra Peros to inquire into and examine the conduct or actions of Sarah A Choujounian-Abulu, pursuant to sections 75 to 79 of the *Health Professions Procedural Code*, to ascertain whether Sarah A Choujounian-Abulu has committed an act of professional misconduct or is incompetent in respect of:

- Demonstration of knowledge, skill and judgment
- Professional conduct outside of the workplace

The Inquiries, Complaints and Reports Committee of the College of Nurses of Ontario has approved this appointment under subsection 75(1)(a) of the *Health Professions Procedural Code*.

A copy of sections 75 - 79 and subsection 93(1) of the *Health Professions Procedural Code* is attached to this appointment.

October 7, 2021

Date

Anne L. Coghlan, RN, MScN
Executive Director and CEO
College of Nurses of Ontario

Sections 75-79 and ss. 93(1) of the *Health Professions Procedural Code*

Investigators

75. (1) The Registrar may appoint one or more investigators to determine whether a member has committed an act of professional misconduct or is incompetent if,

(a) the Registrar believes on reasonable and probable grounds that the member has committed an act of professional misconduct or is incompetent and the Inquiries, Complaints and Reports Committee approves of the appointment;

(b) the Inquiries, Complaints and Reports Committee has received information about a member from the Quality Assurance Committee under paragraph 4 of subsection 80.2 (1) and has requested the Registrar to conduct an investigation; or

(c) the Inquiries, Complaints and Reports Committee has received a written complaint about the member and has requested the Registrar to conduct an investigation. 2007, c. 10, Sched. M, s. 53.

Emergencies

(2) The Registrar may appoint an investigator if,

(a) the Registrar believes on reasonable and probable grounds that the conduct of the member exposes or is likely to expose his or her patients to harm or injury, and that the investigator should be appointed immediately; and

(b) there is not time to seek approval from the Inquiries, Complaints and Reports Committee. 2007, c. 10, Sched. M, s. 53.

Report

(3) Where an investigator has been appointed under subsection (2), the Registrar shall report the appointment of the investigator to the Inquiries, Complaints and Reports Committee within five days. 2007, c. 10, Sched. M, s. 53.

Application of *Public Inquiries Act, 2009*

76. (1) An investigator may inquire into and examine the practice of the member to be investigated and section 33 of the *Public Inquiries Act, 2009* applies to that inquiry and examination. 2009, c. 33, Sched. 6, s. 84.

Reasonable inquiries

(1.1) An investigator may make reasonable inquiries of any person, including the member who is the subject of the investigation, on matters relevant to the investigation. 2009, c. 6, s. 1.

Idem

(2) An investigator may, on the production of his or her appointment, enter at any reasonable time the place of practice of the member and may examine anything found

there that is relevant to the investigation. 1991, c. 18, Sched. 2, s. 76 (2); 2007, c. 10, Sched. M, s. 54.

Obstruction prohibited

(3) No person shall obstruct an investigator or withhold or conceal from him or her or destroy anything that is relevant to the investigation. 1991, c. 18, Sched. 2, s. 76 (3).

Member to co-operate

(3.1) A member shall co-operate fully with an investigator. 2009, c. 6, s. 1.

Conflicts

(4) This section applies despite any provision in any Act relating to the confidentiality of health records. 1991, c. 18, Sched. 2, s. 76 (4).

Entries and searches

77. (1) A justice of the peace may, on the application of the investigator made without notice, issue a warrant authorizing an investigator to enter and search a place and examine any document or thing specified in the warrant if the justice of the peace is satisfied that the investigator has been properly appointed and that there are reasonable and probable grounds established upon oath for believing that,

(a) the member being investigated has committed an act of professional misconduct or is incompetent; and

(b) there is something relevant to the investigation at the place. 2007, c. 10, Sched. M, s. 55.

Hours of execution

(2) A warrant issued under subsection (1) may be executed only between 8 a.m. and 8 p.m. unless the warrant specifies otherwise. 2007, c. 10, Sched. M, s. 55.

Application for dwelling

(2.1) An application for a warrant under subsection (1) to enter a dwelling shall specifically indicate that the application relates to a dwelling. 2007, c. 10, Sched. M, s. 55.

Assistance and entry by force

(3) An investigator entering and searching a place under the authority of a warrant issued under subsection (1) may be assisted by other persons and may enter a place by force. 1991, c. 18, Sched. 2, s. 77 (3).

Investigator to show identification

(4) An investigator entering and searching a place under the authority of a warrant issued under subsection (1) shall produce his or her identification, on request, to any person at the place. 1991, c. 18, Sched. 2, s. 77 (4).

Copying of documents and objects

78. (1) An investigator may copy, at the College's expense, a document or object that an investigator may examine under subsection 76 (2) or under the authority of a warrant issued under subsection 77 (1).

Removal for documents and objects

- (2) An investigator may remove a document or object described in subsection (1) if,
- (a) it is not practicable to copy it in the place where it is examined; or
 - (b) a copy of it is not sufficient for the purposes of the investigation.

Return of documents and objects or copies

- (3) If it is practicable to copy a document or object removed under subsection (2), the investigator shall,
- (a) if it was removed under clause (2) (a), return the document or object within a reasonable time; or
 - (b) if it was removed under clause (2) (b), provide the person who was in possession of the document or object with a copy of it within a reasonable time.

Copy as evidence

(4) A copy of a document or object certified by an investigator to be a true copy shall be received in evidence in any proceeding to the same extent and shall have the same evidentiary value as the document or object itself.

Definition

(5) In this section,

"document" means a record of information in any form and includes any part of it. 1991, c. 18, Sched. 2, s. 78.

Report of investigation

- 79.** The Registrar shall report the results of an investigation to,
- (a) the Inquiries, Complaints and Reports Committee if the investigator was appointed under clause 75 (1) (a) or (b) or subsection 75 (2);
 - (b) the Inquiries, Complaints and Reports Committee if the investigator was appointed under clause 75 (1) (c), at the request of the Inquiries, Complaints and Reports Committee; or
 - (c) the Board if the investigator was appointed under clause 75 (1) (c) by the Board exercising the Registrar's powers under subsection 28 (6). 2007, c. 10, Sched. M, s. 56.

Offences

93. (1) Every person who contravenes an order made under subsection 7 (3) or section 45 or 47, or who contravenes subsection 76 (3), 82 (2) or (3), 85.2 (1), 85.5 (1) or (2) or 85.14 (2) or section 92.1 is guilty of an offence and on conviction is liable,

(a) in the case of an individual to a fine of not more than \$25,000 for a first offence and not more than \$50,000 for a second or subsequent offence; or

(b) in the case of a corporation to a fine of not more than \$50,000 for a first offence and not more than \$200,000 for a second or subsequent offence. 2007, c. 10, Sched. M, s. 72; 2009, c. 26, s. 24 (17).

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

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**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

AFFIDAVIT OF KRISTAL PITTER

I, Kristal Pitter, of the Town of Tillsonburg, in the County of Oxford, make oath and say:

1. I am a Plaintiff in these proceedings and a member of Canadian Frontline Nurses. As such I have knowledge of the matters to which I hereinafter depose. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of my information and belief. All of the information I have deposed to I verily believe to be true.

2. I am a registered nurse. I am entitled to practice with no restrictions.

3. I obtained my Registered Nursing Diploma from Conestoga College of Applied Arts and Technology in 1996. I also obtained a Bachelor of Science in Nursing Degree from the University

of Western Ontario in 2000 and obtained a certificate in Primary Health Care Nurse Practitioner with distinction from this same institution in 2007.

4. I am not presently employed as a nurse, and have not been employed as a nurse since I was terminated from my position with the Ministry of Long-Term Care on March 10, 2021.

5. I did not cause or contribute to COVID-19 related deaths in long-term care facilities.

6. I joined Canadian Frontline Nurses in and around March of 2021.

7. On September 1, 2021, Canadian Frontline Nurses organized rallies across Canada. One of the rallies organized by Canadian Frontline Nurses took place at LHSC Victoria Campus hospital, in London, Ontario (the “London Rally”)

8. On September 1, 2021, I participated in the London Rally. Kristen Nagle also participated in the London Rally that day.

9. I did not harass, threaten, assault, or impede anyone at the London Rally.

10. Throughout my participation in the London Rally, I did not observe any patients, healthcare workers, or any other individuals being impeded from accessing the hospital.

11. I did not observe anyone being assaulted at the London Rally.

12. I did not observe anyone who formed part of the London Rally harass, threaten, or scream insults at healthcare workers.

13. Canadian Frontline Nurses and I received hateful messages and threats of physical harm in the wake of the September 1, 2021 protests.

14. I verily believe that my personal and professional reputation have been adversely affected by the Canadian Nurses Association and the Together News publications that are set out in the Statement of Claim. The Canadian Nurses Association and Together News publications falsely characterize me as a discredited, dangerous, and unprofessional person. These publications falsely associate me with protests where healthcare workers were being harassed and assaulted. The Together News publication falsely associates me with protests that impeded healthcare workers from doing their jobs and interfered with patients receiving the care that they needed.

15. On October 7, 2021, an investigator was appointed by the College of Nurses of Ontario (“CNO”) to ascertain whether I have committed an act of professional misconduct or if I am incompetent in respect of demonstration of knowledge, skill and judgment, use of a protected title, and professional conduct outside of the workplace. A copy of the Appointment of Investigator form dated October 7, 2021 is attached hereto and marked as Exhibit “A”.

16. I am aware, through my review of the confidential disclosure package that was sent by the CNO on June 10, 2022 relating to the CNO’s October 7, 2021 investigation, that there have been

complaints from the public arising from my participation and Canadian Frontline Nurses' participation in the September 1, 2021 protests.

17. I am also aware, through my review of the confidential disclosure package, that the Canadian Nurses Association's September 9, 2021 publication formed part of the basis of some of the complaints made to the CNO concerning me.

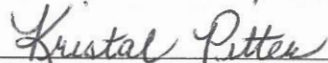
18. The Canadian Nurses Association and Together News publications, and the damage that these publications have caused to my reputation, have caused me significant mental distress.

Sworn or Affirmed before me: ☐ in person OR ☒ by video conference

by Kristen Pitter of the Town of
Tillsonburg, in the County of Oxford
before me in Toronto on July 14, 2022 in
accordance with O. Reg. 431/20
Administering Oath or Declaration
Remotely.

Commissioner for Taking Affidavits


Alexander Boissonneau-Lehner


Kristal Pitter

This is Exhibit “A” referred in the Affidavit of Kristal Pitter
sworn July 14, 2022.

A handwritten signature in black ink, appearing to read 'A. Boissonneau-Lehner', is written over a horizontal line.

Commissioner for Taking Affidavits (or as may be)

Alexander Boissonneau-Lehner



**COLLEGE OF NURSES
OF ONTARIO**
**ORDRE DES INFIRMIÈRES
ET INFIRMIERS DE L'ONTARIO**

THE STANDARD OF CARE.
L'EXCELLENCE EN SOINS

101 Davenport Road, Toronto, Ontario
Canada M5R 3P1 www.cno.org
Telephone 416 928-0900
Toll Free (Canada) 1 800 387-5526
Facsimile 416 928-6507

101, chemin Davenport, Toronto (Ontario)
Canada M5R 3P1 www.cno.org
Téléphone 416 928-0900
Sans frais (Canada) 1 800 387-5526
Télécopieur 416 928-6507

**Investigation under the *Health Professions Procedural Code*
Regarding KRISTAL NICOLE PITTER, #9662374**

Appointment of Investigator

I, Anne L. Coghlan, Executive Director and CEO of the College of Nurses of Ontario, appoint Alexandra Peros to inquire into and examine the conduct or actions of Kristal Nicole Pitter, pursuant to sections 75 to 79 of the *Health Professions Procedural Code*, to ascertain whether Kristal Nicole Pitter has committed an act of professional misconduct or is incompetent in respect of:

- Demonstration of knowledge, skill and judgment
- Use of a protected title
- Professional conduct outside of the workplace

The Inquiries, Complaints and Reports Committee of the College of Nurses of Ontario has approved this appointment under subsection 75(1)(a) of the *Health Professions Procedural Code*.

A copy of sections 75 - 79 and subsection 93(1) of the *Health Professions Procedural Code* is attached to this appointment.

October 7, 2021

Date

Anne L. Coghlan, RN, MScN
Executive Director and CEO
College of Nurses of Ontario

Sections 75-79 and ss. 93(1) of the *Health Professions Procedural Code*

Investigators

75. (1) The Registrar may appoint one or more investigators to determine whether a member has committed an act of professional misconduct or is incompetent if,

(a) the Registrar believes on reasonable and probable grounds that the member has committed an act of professional misconduct or is incompetent and the Inquiries, Complaints and Reports Committee approves of the appointment;

(b) the Inquiries, Complaints and Reports Committee has received information about a member from the Quality Assurance Committee under paragraph 4 of subsection 80.2 (1) and has requested the Registrar to conduct an investigation; or

(c) the Inquiries, Complaints and Reports Committee has received a written complaint about the member and has requested the Registrar to conduct an investigation. 2007, c. 10, Sched. M, s. 53.

Emergencies

(2) The Registrar may appoint an investigator if,

(a) the Registrar believes on reasonable and probable grounds that the conduct of the member exposes or is likely to expose his or her patients to harm or injury, and that the investigator should be appointed immediately; and

(b) there is not time to seek approval from the Inquiries, Complaints and Reports Committee. 2007, c. 10, Sched. M, s. 53.

Report

(3) Where an investigator has been appointed under subsection (2), the Registrar shall report the appointment of the investigator to the Inquiries, Complaints and Reports Committee within five days. 2007, c. 10, Sched. M, s. 53.

Application of *Public Inquiries Act, 2009*

76. (1) An investigator may inquire into and examine the practice of the member to be investigated and section 33 of the *Public Inquiries Act, 2009* applies to that inquiry and examination. 2009, c. 33, Sched. 6, s. 84.

Reasonable inquiries

(1.1) An investigator may make reasonable inquiries of any person, including the member who is the subject of the investigation, on matters relevant to the investigation. 2009, c. 6, s. 1.

Idem

(2) An investigator may, on the production of his or her appointment, enter at any reasonable time the place of practice of the member and may examine anything found

there that is relevant to the investigation. 1991, c. 18, Sched. 2, s. 76 (2); 2007, c. 10, Sched. M, s. 54.

Obstruction prohibited

(3) No person shall obstruct an investigator or withhold or conceal from him or her or destroy anything that is relevant to the investigation. 1991, c. 18, Sched. 2, s. 76 (3).

Member to co-operate

(3.1) A member shall co-operate fully with an investigator. 2009, c. 6, s. 1.

Conflicts

(4) This section applies despite any provision in any Act relating to the confidentiality of health records. 1991, c. 18, Sched. 2, s. 76 (4).

Entries and searches

77. (1) A justice of the peace may, on the application of the investigator made without notice, issue a warrant authorizing an investigator to enter and search a place and examine any document or thing specified in the warrant if the justice of the peace is satisfied that the investigator has been properly appointed and that there are reasonable and probable grounds established upon oath for believing that,

(a) the member being investigated has committed an act of professional misconduct or is incompetent; and

(b) there is something relevant to the investigation at the place. 2007, c. 10, Sched. M, s. 55.

Hours of execution

(2) A warrant issued under subsection (1) may be executed only between 8 a.m. and 8 p.m. unless the warrant specifies otherwise. 2007, c. 10, Sched. M, s. 55.

Application for dwelling

(2.1) An application for a warrant under subsection (1) to enter a dwelling shall specifically indicate that the application relates to a dwelling. 2007, c. 10, Sched. M, s. 55.

Assistance and entry by force

(3) An investigator entering and searching a place under the authority of a warrant issued under subsection (1) may be assisted by other persons and may enter a place by force. 1991, c. 18, Sched. 2, s. 77 (3).

Investigator to show identification

(4) An investigator entering and searching a place under the authority of a warrant issued under subsection (1) shall produce his or her identification, on request, to any person at the place. 1991, c. 18, Sched. 2, s. 77 (4).

Copying of documents and objects

78. (1) An investigator may copy, at the College's expense, a document or object that an investigator may examine under subsection 76 (2) or under the authority of a warrant issued under subsection 77 (1).

Removal for documents and objects

- (2) An investigator may remove a document or object described in subsection (1) if,
- (a) it is not practicable to copy it in the place where it is examined; or
 - (b) a copy of it is not sufficient for the purposes of the investigation.

Return of documents and objects or copies

- (3) If it is practicable to copy a document or object removed under subsection (2), the investigator shall,
- (a) if it was removed under clause (2) (a), return the document or object within a reasonable time; or
 - (b) if it was removed under clause (2) (b), provide the person who was in possession of the document or object with a copy of it within a reasonable time.

Copy as evidence

(4) A copy of a document or object certified by an investigator to be a true copy shall be received in evidence in any proceeding to the same extent and shall have the same evidentiary value as the document or object itself.

Definition

- (5) In this section,
- "document" means a record of information in any form and includes any part of it. 1991, c. 18, Sched. 2, s. 78.

Report of investigation

- 79.** The Registrar shall report the results of an investigation to,
- (a) the Inquiries, Complaints and Reports Committee if the investigator was appointed under clause 75 (1) (a) or (b) or subsection 75 (2);
 - (b) the Inquiries, Complaints and Reports Committee if the investigator was appointed under clause 75 (1) (c), at the request of the Inquiries, Complaints and Reports Committee; or
 - (c) the Board if the investigator was appointed under clause 75 (1) (c) by the Board exercising the Registrar's powers under subsection 28 (6). 2007, c. 10, Sched. M, s. 56.

Offences

93. (1) Every person who contravenes an order made under subsection 7 (3) or section 45 or 47, or who contravenes subsection 76 (3), 82 (2) or (3), 85.2 (1), 85.5 (1) or (2) or 85.14 (2) or section 92.1 is guilty of an offence and on conviction is liable,

(a) in the case of an individual to a fine of not more than \$25,000 for a first offence and not more than \$50,000 for a second or subsequent offence; or

(b) in the case of a corporation to a fine of not more than \$50,000 for a first offence and not more than \$200,000 for a second or subsequent offence. 2007, c. 10, Sched. M, s. 72; 2009, c. 26, s. 24 (17).

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

ONTARIO
SUPERIOR COURT OF JUSTICE

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

AFFIDAVIT OF DANIELLE PISTILLI

I, Danielle Pistilli, of the City of North Vancouver, in the Province of British Columbia, make oath
and say:

1. I assisted Canadian Frontline Nurses with the organization of the September 1, 2021 protest that started near the Vancouver General Hospital and made its way to City Hall (the “Vancouver Nurses Protest”). I also attended the Vancouver Nurses Protest on September 1, 2021. As such I have knowledge of the matters to which I hereinafter depose. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of my information and belief. All of the information I have deposed to I verily believe to be true.

2. I currently work in the alternative wellness industry as a sales manager for a wholesale wellness company. I have been in a sales management role for approximately 25 years.

3. I am a co-founder of group that is known as Freedom Rally World. Freedom Rally World is not an incorporated organization. I would describe Freedom Rally World as a loose affiliation of likeminded individuals.

4. Freedom Rally World's mission is to serve as a community building hub for resources, advocates, and grass root movements fighting for the freedom of all Canadians and humanity as a whole.

5. I am not a member of Canadian Frontline Nurses, but I support Canadian Frontline Nurses' mission.

6. I have known Kristen Nagle ("Nagle") and Sarah Choujounian ("Choujounian") since February 2021. Nagle and Sarah have spoken at two of Freedom Rally World rallies: one in February 2021 and one in Summer 2021.

7. Nagle connected me with Christina Mets ("Mets"), a retired nurse who is a representative of Canadian Frontline Nurses in British Columbia. Mets required my assistance with the planning of the Vancouver Nurses Protest. I have experience in organizing protests, so I was happy to lend assistance to Mets and Canadian Frontline Nurses.

8. I utilized my full experience and skillset to support the planning of the logistics and smooth execution of the Vancouver Nurses Protest. Upon Mets' acceptance of my offer to support the

Vancouver Nurses Protest, I was able to arrange for several well-known individuals and healthcare professionals to speak at City Hall. I assisted with communicating and coordinating the plan to begin the Vancouver Nurses Protest at the Vancouver General Hospital (the “Hospital”) and for the gathering to make their way to City Hall from the Hospital.

9. I coordinated with the Vancouver Police Department ahead of the Vancouver Nurses Protest, particularly with Constable Cesar Young. Constable Young has been extremely helpful in coordinating protests that I had assisted in organizing prior to Vancouver Nurses Protest. Constable Young is a member of the Vancouver Police Department’s Emergency and Operational Planning Section Unit.

10. Constable Young and I worked collaboratively to execute a plan that would allow for an orderly protest. We also worked collaboratively to take into account other protests that were to take place in the City on the same date as the Vancouver Nurses Protest in order to minimize potential conflict and confusion throughout the City. We concluded that it would be in the Vancouver Nurses Protest and the City’s best interest to direct the participants in the Vancouver Nurses Protest to march from the vicinity of the Hospital towards City Hall which is a block away.

11. I understand from my discussions with a number of officers of the Vancouver Police Department that they have been impressed with the organization of protests that Freedom Rally World has coordinated. I also believe we have a mutual respect for our respective professionalism and partnership towards forwarding our common objective of keeping the peace and maintaining public safety.

12. I attended the Vancouver Nurses Protest on September 1, 2021 where thousands of peaceful protestors attended in support of frontline nurses.

13. I observed that many participants in the Vancouver Nurses Protests were emotionally overwhelmed by the turnout and support. I witnessed many individuals shed tears. I also observed many physical expressions of solidarity amongst the protestors, including hugging, hand holding, and signs of support.

14. The crowd of individuals partaking in the Vancouver Nurses Protest started in the vicinity of the Hospital, and made their way down to City Hall as planned.

15. Members of the Vancouver Police Department were also present at the Vancouver Nurses Protest.

16. To the best of my knowledge, no individuals were detained, arrested, or charged as a result of their participation in the Vancouver Nurses Protest.

17. I did not harass, threaten, assault, or impede anyone at the Vancouver Nurses Protest.

18. Throughout my participation in the Vancouver Nurses Protest, I did not observe any patients, healthcare workers, or any other individuals being impeded from accessing the hospital.

Furthermore, the entrance for ambulances at the Hospital is located at 10th Avenue, which is located two avenues North of the Vancouver Nurses Protest location on 12th Avenue.

19. I did not observe anyone being assaulted at the Vancouver Nurses Protest.

20. I did not observe anyone who formed part of the Vancouver Nurses Protest harass, threaten, or scream insults at healthcare workers.

21. After the Vancouver Nurses Protest, I had a follow-up call with Constable Young and received no negative feedback with respect to Vancouver Nurses Protest. I also understood from this follow-up call with Constable Young that the Vancouver Police Department estimated that more than 10,000 individuals participated in the Vancouver Nurses Protest.

22. I also received feedback from a number of participants in the Vancouver Nurses Protest after it had concluded. This feedback was universally positive.

Sworn or Affirmed before me remotely

by Danielle Pistilli of the City of North Vancouver, in)
the Province of British Columbia, before me at the)
City of Toronto, in the Province of Ontario on July 15,)
2022 in accordance with O. Reg. 431/20)
Administering Oath or Declaration Remotely.)

Commissioner for Taking Affidavits)

DocuSigned by:

Alexander Boissonneau-Lehner
Alexander Boissonneau-Lehner

DocuSigned by:

D. Pistilli
Danielle Pistilli

Court File No. CV-21-00673636-00

CANADIAN FRONTLINE NURSES et. al.	-and-	CANADIAN NURSES ASSOCIATION et. al
Plaintiffs		Defendants

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
TORONTO

RESPONDING MOTION RECORD OF THE PLAINTIFF

JOHNSTONE & COWLING LLP
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Lawyers for the Plaintiff s