

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

SUPPLEMENTARY MOTION RECORD OF THE PLAINTIFFS

August 15, 2022

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Horter)

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TAB 1

Court File No. CV-21-00673636-0000

ONTARIO
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B E T W E E N:

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

Plaintiffs

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

Defendants

UNDERTAKINGS
given at the Cross-Examination of Sarah Choujounian held on July 22, 2022

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
1.	16-17	27-28	To provide the “case number for this particular appointment of investigator” at “Exhibit D to [Ms. Choujounian’s] affidavit”.	2021-CR-26858.
2.	18-19	30	To provide the other “appointment of investigator document” and to advise	Both investigations were commenced pursuant to Section 75(1)(a) of the <i>Health Professions Procedural Code</i> (i.e. on the grounds that <u>the Registrar</u> believes on reasonable and probable grounds that the member has committed an act of

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
			what “both [investigations] are relating to”.	<p>professional misconduct or is incompetent and the Inquiries, Complaints and Reports Committee approves of the appointment). Note that these are not investigations initiated pursuant to Section 75(1)(c) which deals with complainant-initiated investigations (i.e. when the Inquiries, Complaints and Reports Committee has received a <u>written complaint</u> about the member and has requested the Registrar to conduct an investigation.)</p> <p>As set out in the attached Appointment of Investigator, dated December 10, 2020, the investigation related to an inquiry and examination of the conduct or actions of Sarah A. Choujounian-Abulu to ascertain whether Sarah A. Choujounian-Abulu has committed an act of professional misconduct in respect of:</p> <ul style="list-style-type: none"> • Contravening a standard of practice of the profession • Professional conduct in or outside of the workplace • Providing information or a document to [sic] that the member knows or ought to know contains a false or misleading statement <p>As set out in the Appointment of Investigator, dated October 7, 2021, found at Exhibit “D” to Choujounian’s Affidavit sworn July 14, 2022, the investigation related to an inquiry and examination of the conduct or actions of Sarah A. Choujounian-Abulu to ascertain whether Sarah A. Choujounian-Abulu has committed an act of professional misconduct in respect of:</p> <ul style="list-style-type: none"> • Demonstration of knowledge, skill and judgment • Professional conduct outside the workplace
3.	21	38-39	With respect to the “appointment of two investigators about [Ms. Choujounian’s conduct], to advise “who the complainants were in both of those investigations”.	<p>This was not the undertaking.</p> <p>Ms. Choujounian’s evidence was that she thought “it’s the College that is investigating [her] more than anyone complaining about [her]”. (P 21, Q 37, L3-5).</p> <p>The follow up question was: “Well, the complaint triggers the appointment of the investigator, and so somebody had them do something, had The College do something that resulted in the appointment of two investigators about your conduct. And I’m wondering who the complainants were in both of those investigations.” (P 21, Q 38, L 6-12)</p>

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
				<p>Her response to this question was “I can’t answer that” (P 21, Q 38, L 13”</p> <p>The follow-up question to which the undertaking was given was “You can’t answer it now, but will you look it up for me?” (P 21, Q 39, L 14-15).</p> <p>Ms. Choujounian has looked it up.</p> <p>These two investigations were not complainant-initiated investigations pursuant to section 75(1)(c) of the <i>Health Professions Procedural Code</i>. They were Registrar initiated investigations pursuant to section 75(1)(a) of the <i>Health Professions Procedural Code</i>. See answer to UT #2 above.</p> <p>One could say that the “complainant”, in the sense that “somebody had The College do something that resulted in the appointment of two investigators” is Anne L. Coghlan, who was the Executive Director and CEO of the College of Nurses at the time that the investigations were initiated.</p> <p>For further information regarding the investigation process, please see the Plaintiffs’ counsel’s explanation found at page 31 of Ms. Nagle’s transcript.</p>
4.	21-23	40-44	To advise whether, “on the first investigation”, the “investigator issue[d] a report”, and whether, if such a report exists, it “went to the Inquiries, Complaints and Reports Committee”.	<p>The Plaintiff is not aware of whether the investigator “issued a report”. The disclosure package provided to Choujounian does include a “summary of incidents” which was presumably, but not explicitly, authored by the investigator.</p> <p>The matter went to the Inquiries, Complaints, and Reports Committee. Ms. Choujounian cannot independently confirm whether a report was provided to the Inquiries, Complaints and Reports Committee. The Inquiries, Complaints and Reports Committee referred the matter to the Professional Discipline committee.</p>
5.	37	83	To produce “the city digital flyers or notices” that were distributed “for each city that looked alike but that was just for that city.”	<p>A cloud share containing the digital flyers/notices are available at the following URL:</p> <p>https://johnstonecowling-my.sharepoint.com/:f/p/alehner/EsHwxsg2u-IGv_JB_81H1YUB6uwGHRsPNgODwpAYuclX2w?e=8ta5LQ</p>
6.	37-39	87-90	To produce the “video recording of the Montreal rally” that Ms. Choujounian took, and to make best efforts to	<p>A cloud share containing the videos is accessible at the following URL:</p>

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
			produce “actual video footage of those protests that took place in those cities on that date”, with respect to the “September 1st, 2021 protests that are listed in Exhibit C digital flier”.	<p>https://johnstonecowling-my.sharepoint.com/:f:/p/alehner/EI9OxgunCC1CkGr9EmpnlakB2ZbdwaftkAJRxsGR-mt87g?e=2vf3PS</p> <p>Ms. Choujounian’s video recording of the Montreal rally is included in the “Montreal” folder of the cloud share.</p> <p>The balance of the “actual video footage” of the rallies that the Plaintiffs have made best effort to obtain are organized by city in the cloud share. Some still photographs are included as well.</p>
7.	47	109-112	To “make inquiries to find out” who “provide[d] Colin Butler with [the Plaintiffs’] Statement of Claim” “sometime before January 7, 2022”, and to produce “the email that [Mr. Boissonneau-Lehner’s] office” received from “Mr. Butler as well asking for a comment”.	<p>The Plaintiffs’ counsel sent an email to Colin Butler and also left him a voicemail to inquire who provided him with the Statement of Claim or how he obtained the Statement of Claim. We are awaiting a response. The Plaintiffs will advise of Colin Butler’s response should they receive one.</p> <p>The Plaintiffs confirm that they did not, directly or indirectly, provide Colin Butler with a copy of the Statement of Claim.</p> <p>The Plaintiffs do not know how Colin Butler obtained a copy of the Statement of Claim at this time.</p> <p>The email that was sent to the Plaintiff’s counsel requesting a comment for his article is attached.</p>



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**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 Ackeisha Hamilton 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 in respect of:

- Contravening a standard of practice of the profession
- Professional conduct in or outside of the workplace
- Providing information or a document to that the member knows or ought to know contains a false or misleading statement

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.

December 10, 2020

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).

Subject: \$1M libel suit vs CNA and Together Media Inc

Date: Friday, January 7, 2022 at 1:48:22 PM Eastern Standard Time

From: Colin Butler

To: alehner@johnstonecowling.com

Hi Alex,

Thanks for taking my call today.

I'm interested in a couple of things. Here's the list:

- 1) Who is paying for this lawsuit?
- 2) What are your clients doing now in terms of work?
- 3) Why are your clients so certain these articles were about them when they weren't named?
- 4) Is this a case of the pot calling the kettle black? Each of these women has had allegations leveled against them for making false statements about the pandemic and now they allege false statements have been made about them.

In terms of deadlines, my editors have said they want to go with this whether or not we hear back.

I would need to get something by the end of the business day for it to run in this article, but as we discussed over the phone, there is always the possibility of a follow up.

Please let me know your thoughts on the possibility of your clients agreeing to an interview. I'm always open to hearing from you and them.

Thanks,

Colin

--

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TAB 2

Court File No. CV-21-00673636-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**CANADIAN FRONTLINE NURSES
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And KRISTAL PITTER**

Plaintiffs

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o/a COMOXVALLEY.NEWS and o/a VANISLE.NEWS,
and JOHN DOE**

Defendants

**UNDERTAKINGS
given at the Cross-Examination of Kristen Nagle held on July 22, 2022**

No.	Pg.	Q.	Specific Question	Answer
1.	56-57	133	Paragraph 17 of Ms. Nagle's affidavit states: "My main role in organizing the Canadian Frontline Nurses September 1, 2021, rallies was to coordinate with individuals and organizations who I met and who shared Canadian Frontline Nurses values."	The following are the organizations that Ms. Nagle recalls coordinating with to organize the September 1, 2021 rally (more accurately, she coordinated with individuals affiliated with these organizations): <ul style="list-style-type: none">• Freedom Rally World• Action4Canada• Vaccine Choice Canada• No More Lockdowns Canada• All Fired Up for Freedom• Common Law Education and Right Initiative (CLEAR)

No.	Pg.	Q.	Specific Question	Answer
			To provide “the names of organizations [Ms. Nagle is] referring to in paragraph 17 of [her] affidavit.”	
2.	59	142-143	To produce “any video recordings of the London rally on September 1, 2021” that Ms. Nagle has.	The London rally videos that are in Ms. Nagle’s are in the “London” folder of the cloud share which is accessible at the following URL: https://johnstonecowling-my.sharepoint.com/:f/p/alehner/EI9OxgunCC1CkGr9EmpnlakB2ZbdwaftkAJRxSGR-mt87g?e=2vf3PS
3.	60	146	To “make best efforts to produce videos” from “individuals who participated in the Canadian Frontline Nurses protest” and to produce any videos that can be obtained, “including the Plaintiff’s videos to the extent that they’re retrievable.”	Videos that were obtained through the Plaintiffs’ best efforts that are in the possession of this witness are in cloud share which is accessible at the following URL: https://johnstonecowling-my.sharepoint.com/:f/p/alehner/EI9OxgunCC1CkGr9EmpnlakB2ZbdwaftkAJRxSGR-mt87g?e=2vf3PS

QUESTIONS TAKEN UNDER ADVISEMENT
at the Cross-Examination of Kristen Nagle held on July 22, 2022

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
4.	13-15	25	To advise whether Case File Number 2020-CR-19984 was “initiated or triggered because of complaints from the London Health Science Centre” and to produce “the appointment of the investigator” relating to that case.	While this question is not relevant to the matters at issue on the motion or Kristen Nagle’s affidavit, Case File Number 2020-CR-19984 is a Registrar-initiated investigation (for an explanation of what this means, see the answers to undertakings 2 and 3 in Ms. Choujounian’s undertaking chart). The appointment of investigator is attached.

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
5.	18-19	32-33	To confirm whether “Doris Grinspun’s complaint” is part of what Ms. Nagle has “received from The College” in the “2020 case or the 2021 case”.	Refused on the basis of relevance – any complaint that may or may not have been made by Doris Grinspun to the College of Nurses is not relevant to the matters at issue on this motion or the affidavit of Kristen Nagle. Also refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18.
6.	23-24	45	To produce “whatever information The College provided to Ms. Nagle regarding the complaint from the Registered Nurses Association of Ontario and specifically Doris Grinspun”.	Refused on the basis of relevance – any complaint that may or may not have been made by Doris Grinspun to the College of Nurses is not relevant to the matters at issue on this motion or the affidavit of Kristen Nagle. Also refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18.

QUESTIONS REFUSED
at the Cross-Examination of Kristen Nagle held on July 22, 2022

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
7.	21	39-41	To produce the “investigator’s report that was reviewed by a panel of the Inquiries, Complaints and Reports Committee on October 6, 2021”.	Refused on the basis of relevance. The “investigator’s report” is not relevant to the matters at issue on this motion or the affidavit of Kristen Nagle. Also refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18
8.	49-50	107-108	To “make efforts to find out what the event was that led to the April 26, 2021 charges and what it is [Ms. Nagle] did or said that caused [her] to be charged twice for violating the Emergency Management and Civil Protection Act.”	Answer: The April 26, 2021 charges related to Kristen Nagle’s attendance at a religious service at the Church of God in Aylmer, Ontario. At the time, the <i>Emergency Management and Civil Protection Act</i> limited attendance at church services to no more than 10 people. There were more than 10 people who attended the service at the Church of God with Nagle on April 26, 2021.



**COLLEGE OF NURSES
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**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 Ackeisha Hamilton 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 in respect of:

- Contravening a standard of practice of the profession
- Providing information and documentation to the College
- Providing information that the member knows or ought to know contains false or misleading statement

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.

December 10, 2020

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).

TAB 3

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

**QUESTIONS TAKEN UNDER ADVISEMENT
at the Cross-Examination of Kristal Pitter held on July 22, 2022**

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
1.	12-13	25-27	To produce the Facebook posts “that caused The College to appoint an investigator about [Ms. Pitter’s] conduct”.	Refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18.
2.	14-15	36	To provide a written copy and video of Ms. Pitter’s “speech that was given outside of The College of Nurses in April of 2021”.	While this question is not relevant to the matters raised in this Application or Kristal Pitter’s affidavit, the video, and a transcription of the video, is accessible at the following URL: https://johnstonecowling-my.sharepoint.com/:f/p/alehner/EiTHOkd5D49FvozNeff0vbkBMMfVWwHIdHb3ma7vDtarZg?e=NwFEsY

No.	Pg.	Q.	Specific Question	Answer or Precise Basis for Refusal
3.	24	55-56	<p>Paragraph 2(a) of Exhibit 12 to Ms. Pitter's examination states:</p> <p>(a) A panel of the Inquiries, Complaints and Reports Committee (the "ICRC Panel") of the College of Nurses of Ontario ("CNO") reviewed reports of investigations into the Applicant's nursing practices pursuant to section 79(a) of the <i>Health Professions Procedural Code</i>, which is Schedule 2 to the <i>Regulated Health Professions Act, 1991</i>, S.O. 1991, c. 18.</p> <p>To produce copies of "investigator report[s] into [Ms. Pitter's] nursing practices".</p>	Refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18.
4.	24	57	<p>Paragraph 2(b) of Exhibit 12 to Ms. Pitter's examination states:</p> <p>(b) On November 18, 2021, the ICRC Panel released its decision (the "Decision").</p> <p>To produce a copy of the "November 18, 2021, ICRC panel decision".</p>	Refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18.
5.	25	58-59	<p>Paragraph 2(c) of Exhibit 12 to Ms. Pitter's examination states:</p> <p>(c) In the Decision, the ICRC Panel found that Ms. Pitter "failed to maintain the profession's standards by making public statements on a social media platform, Facebook, which were false, inaccurate, or seriously misleading with respect to the COVID-19 virus, vaccines, and/or pandemic response, and in which [she] identified [herself] as a Nurse Practitioner."</p> <p>To produce the Facebook posts referenced in paragraph 2(c).</p>	Refused on the basis of Section 36(3) of the <i>Regulated Health Professions Act, 1991</i> , SO 1991, c 18.
6.	43	99	To produce "any Facebook posts dealing with Bill Gates" that Ms. Pitter "referred to".	The post that Kristal Pitter referred to (at pages 42-43 of the transcript) is no longer retrievable from her Facebook profile. However, a screenshot of the post which she shared on Facebook is attached.

Shared post-
"Because RNA vaccines let your body do n
of the work, they don't require much mater
That makes them much faster to manufact
There's a catch, though: we don't know for
yet if RNA is a viable platform for vaccin
Since COVID would be the first RNA vaccin
of the gate, we have to prove both that the
platform itself works and that it creates
immunity. It's a bit like building your compl
system and your first piece of software at t
same time." ~ Bill Gates

"Two new technologies are in the COVID tr
pipeline as we speak: DNA and RNA vaccin
They have never been released for public use.
DNA technology is actually gene therapy.
Genes are injected into the body, and they
permanently alter the genetic makeup of the
recipient in unknown ways.

RNA vaccines would carry the danger of
triggering autoimmune reactions, meaning the
body basically goes to war against itself.

The vaccine that is being tapped by the US
government... under its National Institutes of
Health...through drug company Moderna...HAS
NEVER BEEN USED ON THE PUBLIC BEFORE.
IT IS NOT LICENSED FOR PUBLIC USE.
RNA VACCINES AND THE TECHNOLOGY T
USE ARE ENTIRELY EXPERIMENTAL.
AND THIS IS THE TYPE OF VACCINE BEIN
RUSHED INTO EXISTENCE IN 90 DAYS.

What in the world could possibly go wrong
One way to find out is to unleash it on milli
of people, stand back, and see." ~Jon
Rappoport

Are ready for your family and your children
be used as guinea pigs in the largest globa
health experiment ever conducted? See le

BILL GATES EXPLAINS THAT
THE COVID VACCINE WILL
USE EXPERIMENTAL
TECHNOLOGY AND
PERMANENTLY ALTER YOUR
DNA

May 15, 2020



TAB 4

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

UNDERTAKINGS

given at the Cross-Examination of Michael Villeneuve held on July 21, 2022

No.	Pg.	Q.	Specific Question	Answer
1.	16	29	To check if Mr. Villeneuve “replied to any of the private messages that he’s referring to in the September 4th, 2021 e-mail between September 4, 2021 and end of day September 9, 2021”, and if so, to produce the replies.	Mr. Villeneuve's replies, dated between September 4, 2021 and the end of September 9, 2021, to private messages he referred to in Exhibit 28 to his affidavit are attached: <ul style="list-style-type: none">• An email from Mr. Villeneuve to Wendy Nicklin dated September 9, 2021.• An email from Mr. Villeneuve to Sofia Lytwynec dated September 9, 2021.

No.	Pg.	Q.	Specific Question	Answer
2.	17	32	To check whether "there were any emails exchanged with Linda Silas between September 4, 2021 and September 9, 2021", and if so, to produce them.	<p>Mr. Villeneuve's email correspondence with Ms. Silas between September 4, 2021 and September 9, 2021 is attached, all contained in one email chain:</p> <ul style="list-style-type: none"> • An email from Mr. Villeneuve to many recipients, including to Ms. Silas, dated September 9, 2021 at 3:55 PM; • A reply email from Ms. Silas to Mr. Villeneuve dated September 9, 2021 at 4:08 PM; • A reply email from Mr. Villeneuve to Ms. Silas dated September 9, 2021 at 4:17pm.
3.	58-59	155	With respect to Paragraph 19(a) of Mr. Villeneuve's affidavit, to advise "which mainstream media reports at Exhibit 5 of Mr. Villeneuve's affidavit indicate that the crowds that protested in front of health care settings were unfriendly", and to advise whether Mr. Villeneuve or CNA took "any steps to verify the truth of those reports".	<p>Mainstream media reports contained in Exhibits 5 and 7 to Mr. Villeneuve's affidavit are responsive to this question. A summary of the mainstream media reports indicating that the crowds that protested in front of health care settings were unfriendly is included as Table 1 of Appendix A to these Answers. The mainstream media articles identified in Appendix A report that the crowds that protested in front of health care settings were unfriendly. These protests were not limited to the protests Canadian Frontline Nurses has admitted to organizing, and are the protests referred to in the CNA Statement.</p> <p>Mr. Villeneuve reviewed the statements released by various public health authorities and observed the news being reported on mainstream news outlets on television and in print. Mr. Villeneuve also received corroborating information from trusted leaders in nursing at hospitals across the country, who he spoke to prior to the publication of the CNA Statement.</p>
4.	59	155	With respect to Paragraph 19(c) of Mr. Villeneuve's affidavit, to advise "which mainstream media reports found at Exhibit 5 to Mr. Villeneuve's affidavit reference anti-science statements", and to advise whether Mr. Villeneuve or CNA "took any steps to verify the truth of those reports".	<p>Mainstream media reports contained in Exhibits 5 and 7 to Mr. Villeneuve's affidavit are responsive to this question. A summary of the mainstream media reports that "some of the protesters made anti-science" statements are included as Table 2 of Appendix A. The mainstream media articles identified in Appendix A report that some of the protesters made anti-science statements.</p> <p>Mr. Villeneuve reviewed the statements released by various public health authorities and observed the news being reported on mainstream news outlets on television and in print. Mr. Villeneuve also received corroborating information from trusted</p>

No.	Pg.	Q.	Specific Question	Answer
				leaders in nursing at hospitals across the country, who he spoke to prior to the publication of the CNA Statement.
5.	60	155	With respect to Paragraph 19(d) of Mr. Villeneuve's affidavit, to advise "which mainstream media reports at Exhibit 5 reference harassment of health care workers", and to advise whether Mr. Villeneuve or CNA "took any steps to verify the truth of reports referencing harassment of health care workers".	<p>Mainstream media reports contained in Exhibits 5 and 7 to Mr. Villeneuve's affidavit are responsive to this question. A summary of the mainstream media reports that "reference harassment of healthcare workers" is included as Table 3 of Appendix A. The mainstream media articles identified in Appendix A report that healthcare workers were harassed by and / or during the protests. These protests were not limited to the protests Canadian Frontline Nurses has admitted to organizing, and are the protests referred to in the CNA Statement.</p> <p>Mr. Villeneuve reviewed the statements released by various public health authorities and observed the news being reported on mainstream news outlets on television and in print. Mr. Villeneuve also received corroborating information from trusted leaders in nursing at hospitals across the country, who he spoke to prior to the publication of the CNA Statement. In response to this request, Mr. Villeneuve also relies on the statements summarized in Tables 1-5 of Appendix A, and generally on the articles referenced in those Tables.</p>
6.	60-61	155	With respect to Paragraph 19(d) of Mr. Villeneuve's affidavit, to advise "which mainstream media reports at Exhibit 5 reference health care workers being inhibited" from accessing hospitals, and to advise whether Mr. Villeneuve or CNA took "any steps to verify the truth of those reports".	<p>Mainstream media reports contained in both Exhibits 5 and 7 to Mr. Villeneuve's affidavit are responsive to this question. A summary of the mainstream media reports which "reference healthcare workers being inhibited from accessing hospitals" is included as Table 4 of Appendix A. The mainstream media articles identified in Appendix A report that some of the protesters impeded access to hospitals for health care workers, patients, and members of the public. These protests were not limited to the protests Canadian Frontline Nurses has admitted to organizing, and are the protests referred to in the CNA Statement.</p> <p>Mr. Villeneuve reviewed the statements released by various public health authorities and observed the news being reported on mainstream news outlets on television and in print. Mr. Villeneuve also received corroborating information from trusted leaders in nursing at hospitals across the country who he spoke to prior to the publication of the CNA Statement.</p>

No.	Pg.	Q.	Specific Question	Answer
7.	61-62	155	With respect to Paragraph 19(d) of Mr. Villeneuve's affidavit, to advise "which mainstream media reports at Exhibit 5 to Mr. Villeneuve's affidavit reference health care workers being threatened", and to advise whether Mr. Villeneuve or CNA took "any step to verify the truth of reports of health care workers being threatened at the protest".	<p>The mainstream media reports referenced in the answer to Undertaking #5 and summarized at Table 3 of Appendix A are also directly responsive to this question. The mainstream media articles identified in Appendix A report that health care workers were threatened by protesters, and / or felt threatened by protesters. These protests were not limited to the protests Canadian Frontline Nurses has admitted to organizing, and are the protests referred to in the CNA Statement.</p> <p>Mr. Villeneuve reviewed the statements released by various public health authorities and observed the news being reported on mainstream news outlets on television and in print. Mr. Villeneuve also received corroborating information from trusted leaders in nursing at hospitals across the country who he spoke to prior to the publication of the CNA Statement.</p>

Appendix A

Table 1 (Undertaking # 3 – The unfriendly crowds that protested in front of healthcare settings)

Article	Statement	Pinpoint (MR)
More than 200 people protest COVID-19 vaccine mandates outside Saskatoon hospital Global News, Sep 1, 2021	More than 200 people protested outside Saskatoon's City Hospital, shouting how they dislike masks, vaccines and vaccine mandates.	p. 566
Vax card protesters take over streets near Kelowna General Hospital Kelowna Capital News, Sep 1, 2021	The event began around 1 p.m. The large and aggressive crowd has taken over most sidewalks surrounding the hospital and several cars are driving by blaring their horns. Throughout the event, people were chanting "freedom."	p. 574
Anti-vaccine protesters gather outside Kingston General Hospital Global News, Sep 7, 2021	At one point, a woman driving by the hospital stopped her vehicle, and shouted to the group that she had cancer. Many from the group shouted back to her, some screaming "freedom," in unison.	p. 621
LETTER: 'We see you' says ICU nurse to Kelowna General Hospital protesters Kelowna Capital News, Sep 3, 2021	To the 1,000 or so protesting outside Kelowna General Hospital on Wednesday — we see you. How could we not? The screaming, yelling, honking. It's hard to miss. To the people yelling, swearing, and fingering hospital staff on the skywalk — we see you. To the people shouting at staff that we were 'part of the problem' — we see you.	p. 634-635
'Don't hurt the helpers': Healthcare workers react to reports of assault, verbal harassment at protests Chek, Sep 2, 2021	In Vancouver, police estimate 5,000 protesters spilled onto the streets outside Vancouver General Hospital, forcing ambulances to slow down outside, with chants of 'lock her up' in reference to Dr. Bonnie Henry. "It makes me very sad that people would do that to others, watching the ambulance try to get through made me very upset and sad. Taking it out on me is something I have been living with as some of you know for some time," Dr. Henry said Thursday. "What upsets me is the amount of anger and vitriol that has been directed at others in public health and my team and my staff, and that's inexcusable and very upsetting."	p. 670

Table 2 (Undertaking #4 – some of the protesters made anti-science statements)

Article	Statement	Pinpoint (MR)
Reports of assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C. CBC News, Sep 1, 2021	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." In posters for the event, dubbed "worldwide walkout," the group urged supporters to "stand up for freedom" and "reject the tyranny of mandatory vaccines."	p. 550
B.C. officials decry targeting of health-care workers as thousands protest vaccine passports CBC News, Sep 1, 2021		p. 560
Reports of 1 assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C. Radio-canada.ca, Sep 1, 2021		p. 599
More than 200 people protest COVID-19 vaccine mandates outside Saskatoon hospital Global News, Sep 1, 2021	One speaker at the event repeatedly made debunked claims about masks, vaccinations and COVID-19, which has killed more than four million people around the world, to the applause of many of the people gathered together. The statement also said the SHA does not support opinions that cast doubt on the seriousness of COVID-19, the validity of science, the pandemic and the effectiveness of vaccinations. "This kind of communication feeds conspiracy theories and misinformation, as well as sends the false message that our health care workers at the front line are somehow faking or making up the loss of life and trauma occurring as a result of COVID," it read."	p. 566, 567
'Truly disheartening:' Ontario Hospital Association says anti-vaccine protests outside hospitals went too far CP24, Sep 3, 2021	Hundred of demonstrators blocked traffic along University Avenue at College Street on Wednesday as they protested vaccine mandates and shared misinformation about COVID-19 vaccines outside the entrances to Toronto General and Mt. Sinai hospitals. "By denying the effectiveness of COVID-19 vaccines they also inflicted moral injury on health care workers who are working tirelessly on the frontlines caring for patients sick and dying from this dangerous virus," he said. "It is a bitter irony that should any of these anti-vaccine protesters get sick or seriously ill from COVID, it will be hospitals and frontline workers that they turn to for care, perhaps even to save their life." [CEO Anthony Dale of the Ontario Hospital Association]	p. 638

<p>Medical groups denounce bullying, attacks on health-care workers as protests target hospitals</p> <p>CBC News, Sep 3, 2021</p>	<p>The B.C. 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 United States for those who think the pandemic is a "fraud."</p> <p>In a strongly worded joint press release from the Canadian Medical Association (CMA) and Ontario Medical Association (OMA) released on Friday, CMA president Dr. Katharine Smart and OMA president Dr. Adam Kassam said the escalation in anti-vaccine messaging in recent weeks was "precluding access to much-needed health-care settings and demoralizing health-care workers."</p> <p>"We have confronted uncertainty, exposed ourselves to risks and worked prolonged hours, weeks and months all in support of our patients and the public we serve. We have not signed up for bullying, attacks and violence, at the hands of those who do not subscribe to science or health advice," the statement said.</p> <p>"They impeded patient access to the hospitals themselves. By denying the effectiveness of COVID-19 vaccines, they also inflicted moral injury on health-care workers who are working tirelessly on the front lines caring for patients sick and dying from this dangerous virus," [CEO Anthony Dale of the Ontario Hospital Association] said.</p>	<p>p. 648-650</p>
<p>Anti-vaccine protesters harassing health care workers, patients: AHS president</p> <p>Calgary Herald, Sep 3, 2021</p>	<p>Even so, those protesters say they're determined to press on in the face of what they call "criminal" and "unscientific" measures that violate their civil rights.</p> <p>Some protesters refer to vaccinations as clotshots, following reports of extremely rare blood clotting following immunizations.</p> <p>Another nurse at the protest said she's already had COVID-19 which makes vaccination for her unnecessary, though epidemiologists say that's far from certain, particularly with the more contagious Delta variant.</p>	<p>p. 657</p>

Table 3 (Undertaking #5 – harassment and threatening of healthcare workers)

Article	Statement	Pinpoint (MR)
Crowd protesting vaccine mandates causes chaos outside of Health Sciences Centre CBC News, Sep 1, 2021	A spokesperson said patients had difficulty getting in, were "aggressively harassed" for wearing masks, and some cancelled their appointments rather than approach the protesters standing near entrances.	p. 546
Reports of assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C. CBC News, Sep 1, 2021	By the early evening, one health authority was reporting a physical assault against a health-care worker. Island Health's president and CEO Kathy MacNeil said some of the protests on Vancouver Island had disrupted people's safe access to health care. "Members of Island Health care teams were verbally abused as they came to and left work during these protests, and in at least one case, a health-care team member was physically assaulted," MacNeil said in a written statement.	p. 550, 552
B.C. officials decry targeting of health-care workers as thousands protest vaccine passports CBC News, Sep 1, 2021	Premier John Horgan called out what he described as "harassment" of health-care workers during the protests. "While everyone has the right to peaceful protest, the targeting and harassment of health-care workers at health-care facilities today is completely unacceptable. We stand by our health-care workers and support them fully," he said in a written statement.	p. 560, 562
Reports of 1 assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C. Radio-canada.ca, Sep 1, 2021		p. 600
Hundreds gather to protest vaccine mandate, passports outside of Winnipeg's largest hospital Winnipeg Sun, Sep 1, 2021	Shared Health said the protest slowed the public and staff's ability to access HSC on Wednesday afternoon. "Today's demonstration... was disappointing to witness and profoundly disrespectful to the dedicated health-care workers who have continuously put the health and well-being of Manitobans first " a spokesperson said. "We have heard from staff and patients who experienced difficulty accessing our facility or who were aggressively harassed for wearing masks. We know of some patients who opted to cancel their appointments rather than approach the protesters standing near our entrances." "While we respect the freedom of individuals to protest public health orders, we urge them to do so in a peaceful manner that does not disrupt people's access to medical care."	p. 592-593
Vaccine protests threaten to disrupt essential services as crowds gather outside hospitals, police headquarters The Globe and Mail, Sep 2, 2021	[Toronto Police Service spokesperson Connie Osborne] added that people have the right to protest, but that everyone has the right not to be harassed. "Officers will try to engage with all groups of protesters and will remind them of the expected behaviour. If crimes are committed, officers can make arrests at the time, where warranted," she said.	p. 597

Article	Statement	Pinpoint (MR)
Protester spat at Nanaimo nurse outside hospital, RCMP say Victoria Times-Colonist, Sep 2, 2021	A nurse heading to work was spat at during a protest Wednesday, Nanaimo RCMP say. The woman told police the man was participating in an anti- vaccine-card rally outside Nanaimo Regional General Hospital, Const. Gary O'Brien said. The protester spit in the direction of the woman but it did not reach her. Kathy MacNeil, president and CEO of the Island Health, said Wednesday that some workers at health-care facilities were verbally abused as they came to and from work, and at least one staff member was physically assaulted.	p. 603-604
Anti-vaccine protesters gather outside Kingston General Hospital Global News, Sep 7, 2021	A man not taking part in the protest came to speak while wearing a mask. "I do not believe in harassing people who are just trying to do their job and take care of others," he said.	p. 622
LETTER: 'We see you' says ICU nurse to Kelowna General Hospital protesters Kelowna Capital News, Sep 3, 2021	To the people yelling, swearing, and fingering hospital staff on the skywalk — we see you. To the people shouting at staff that we were 'part of the problem' — we see you. To the four vehicles circling the block repeatedly honking your horns to make it seem like there were more supportive vehicles than there actually were — we see you.	p. 635
Medical groups denounce bullying, attacks on health-care workers as protests target hospitals CBC News, Sep 3, 2021	National and provincial medical groups are decrying an increase in "bullying, attacks and violence" directed at health-care workers, as hospitals are targeted by large groups of anti-vaccine protesters and those opposed to mandatory vaccination.	p. 646
Anti-vaccine protesters harassing health care workers, patients: AHS president Calgary Herald, Sep 3, 2021	While those opposed to restrictions and vaccination requirements have a right to protest, some have gone beyond that to accost patients and health-care workers at those sites, said AHS President Dr. Verna Yiu. "I am aware of instances where AHS employees were yelled at, and subjected to harassment. Some did not feel safe walking to and from their workplace," she said in a statement Friday. "To target health-care workers with anger and vitriol is not acceptable, particularly now."	p. 655-656
'How dare you': Healthcare workers react to rally against COVID vaccine cards at Kelowna General Infonews.ca, Sep 2, 2021	Myriah Acheson wrote on Facebook that while working at the Kelowna hospital yesterday, she sat and listened to the honks, yells and jeers of protestors and cried while on her break.	p. 664

Article	Statement	Pinpoint (MR)
<p>'Don't hurt the helpers': Healthcare workers react to reports of assault, verbal harassment at protests</p> <p>Chek, Sep 2, 2021</p>	<p>But as vaccine passport protests grew outside hospitals around B.C. Wednesday, healthcare workers became targets of harassment and assault.</p> <p>“Trying to walk into the hospital, there’s a sea of people around. No one has a mask on. It didn’t even feel like a safe thing to get through,” said Marcia Kent, a nurse at Nanaimo Regional General Hospital (NRGH).</p> <p>At the same hospital, police received a report that one anti-vaccine passport protester even spit at a nurse on her way to work.</p> <p>“She was not hit with the spit. She wanted to report it just for information purposes in the event it happened again. She gave a full description of who that person is,” said Nanaimo RCMP Constable Gary O’Brien.</p> <p>Island Health says multiple members of their teams were verbally abused as they came to and left work during the protests, with only one case so far where a healthcare team member was physically assaulted.</p> <p>“You have an absolute right to protest, but you don’t have a right to be abusive and harass. And why you’d be particularly abusive to the people who may well have to take care of you because you’ve chosen not to be vaccinated when you become sick, is beyond me,” said Dr. David Forrest, an infectious disease physician at NRGH.</p>	<p>p. 668, 669</p>
<p>Anti-vaccine protesters harassing health care workers, patients: AHS president</p> <p>Calgary Herald, Sep 3, 2021</p>	<p>“It’s hard to describe the emotions — they go from being hurt to anger to despondency,” said Dr. Noel Gibney.</p> <p>Health-care workers, he said, are being “insulted by these crazy people while they’re trying to save the lives of these people.”</p>	<p>p. 657</p>

Table 4 (Undertaking #6 – Health care workers inhibited from accessing hospitals)

Article	Statement	Pinpoint (MR)
<p>Crowd protesting vaccine mandates causes chaos outside of Health Sciences Centre</p> <p>CBC News, Sep 1, 2021</p>	<p>Hundreds of people protesting vaccine mandates swarmed Winnipeg's largest hospital Wednesday afternoon, slowing traffic and some confronting people as they tried to enter. Crowds gathered on the sidewalk outside Health Sciences Centre, hampering foot traffic into the 820 Sherbrook St. entrance and impeding vehicles turning into the drop-off loop for the rehabilitation and clinic areas.</p> <p>Several patients trying to get into the hospital chastised the protesters for getting in the way. The protest created traffic congestion that obstructed the arrival of ambulances, with sirens blaring, to the emergency department.</p> <p>A spokesperson said patients had difficulty getting in, were "aggressively harassed" for wearing masks, and some cancelled their appointments rather than approach the protesters standing near entrances.</p>	p. 545-546
<p>Reports of assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C.</p> <p>CBC News, Sep 1, 2021</p>	<p>Protesters clogged the streets of Vancouver as part of widespread demonstrations outside hospitals in Vancouver, Kelowna, Kamloops, Victoria, Prince George, Nanaimo and in other Canadian cities. The rallies were organized by Canadian Frontline Nurses, a group that has promoted conspiracy theories about COVID-19. (image caption)</p> <p>Protesters block traffic outside Vancouver General Hospital and Vancouver City Hall. (image caption)</p>	p. 550-553
<p>B.C. officials decry targeting of health-care workers as thousands protest vaccine passports</p> <p>CBC News, Sep 1, 2021</p>		p. 560-562
<p>Reports of assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C.</p> <p>CBC News, Sep 1, 2021</p>	<p>By 3 p.m., police estimated that as many as 5,000 people were blocking traffic at the intersection of Cambie Street and 12th Avenue.</p>	p. 554
<p>B.C. officials decry targeting of health-care workers as thousands protest vaccine passports</p> <p>CBC News, Sep 1, 2021</p>		p. 563

Article	Statement	Pinpoint (MR)
Reports of 1 assault, verbal abuse as thousands protest vaccine passports outside hospitals across B.C. Radio-canada.ca, Sep 1, 2021		p. 601
Protesters take their case against vaccine requirements to Vancouver General Hospital, city hall Vancouver Sun, Sep 1, 2021	A large crowd gathered outside Vancouver General Hospital at 1 p.m., then made its way to Vancouver City Hall and across the Cambie Bridge to Downtown Vancouver, causing traffic and transit delays. Vancouver Mayor Kennedy Stewart took to Twitter to voice his unhappiness with the protesters, saying he is proud that more than 90 per cent of Vancouver residents have had at least one vaccine dose. "So, when I see folks blocking health-care workers who are working flat-out to save people dying of COVID, it makes me sick," said Stewart. The protest resulted in "some slowdowns" as paramedics had to navigate clogged roads near VGH and St. Paul's Hospital, said a spokeswoman for B.C. Emergency Health Services. However, no ambulances had to be redirected.	p. 580, 584
Hundreds gather to protest vaccine mandate, passports outside of Winnipeg's largest hospital Winnipeg Sun, Sep 1, 2021	"Shared Health said the protest slowed the public and staff's ability to access HSC on Wednesday afternoon. "Today's demonstration... was disappointing to witness and profoundly disrespectful to the dedicated health-care workers who have continuously put the health and well-being of Manitobans first " a spokesperson said. "We have heard from staff and patients who experienced difficulty accessing our facility or who were aggressively harassed for wearing masks. We know of some patients who opted to cancel their appointments rather than approach the protesters standing near our entrances." "While we respect the freedom of individuals to protest public health orders, we urge them to do so in a peaceful manner that does not disrupt people's access to medical care.""	p. 592-593
Vaccine protests threaten to disrupt essential services as crowds gather outside hospitals, police headquarters The Globe and Mail, Sep 2, 2021	Hundreds of protesters were blocking the intersection in front of the hospital. "Cars weren't able to go anywhere, which is a big problem for us because our ambulance bay is actually right at that intersection," Dr. Sahota said."	p. 596
LETTER: 'We see you' says ICU nurse to Kelowna General Hospital protesters Kelowna Capital News, Sep 3, 2021	To the people blocking the sidewalks and roads impeding patients/staff/visitors from getting to the hospital — we see you.	p. 635

Article	Statement	Pinpoint (MR)
'Truly disheartening:' Ontario Hospital Association says anti-vaccine protests outside hospitals went too far CP24, Sep 3, 2021	Hundred of demonstrators blocked traffic along University Avenue at College Street on Wednesday as they protested vaccine mandates and shared misinformation about COVID-19 vaccines outside the entrances to Toronto General and Mt. Sinai hospitals. The protest continued for hours, forcing some healthcare workers to go through the throngs of mask-less demonstrators to get to work.	p. 638
'My last straw': Vancouver paramedic on brink of quitting due to hospital protests CBC News, Sep 3, 2021	"I watched someone start to bleed to death when they didn't have to, when time would have made all the difference in the world," she said. "That was my last straw." The paramedic and her team had picked up the patient — who had been critically injured in an industrial accident and had an arterial bleed — from a site on Vancouver's waterfront. They headed to St. Paul's Hospital in downtown Vancouver. But a trip that would have normally taken around eight minutes took more than twice as long due to traffic. "When we did finally get to St. Paul's, there were protesters blocking the driveway — they've got signs and they're yelling. So it's the first we knew about anything going on," she said. Police were able to move the protesters out of the way, she said, and the patient was finally taken to surgery. But in any emergency, time is of the essence — and the paramedic says precious time was lost because of the activity around the hospital. The largest protest took place in Vancouver, with police estimating that as many as 5,000 people were blocking traffic at the intersection of Cambie Street and 12th Avenue. Though Vancouver Coastal Health said there were no disruptions to patient care, B.C. Ambulance Service says there were several reports of slowdowns as paramedics navigated the congestion. "This is Vancouver. We have protests ... every second day downtown. Somebody will protest something and we just work around as emergency response vehicles. But don't block the entrances to our hospitals," said the paramedic.	p. 642-643
Medical groups denounce bullying, attacks on health-care workers as protests target hospitals CBC News, Sep 3, 2021	In a similarly frank statement from the Ontario Hospital Association, president and CEO Anthony Dale said the protests were "truly disheartening." "They impeded patient access to the hospitals themselves. By denying the effectiveness of COVID-19 vaccines, they also inflicted moral injury on health-care workers who are working tirelessly on the front lines caring for patients sick and dying from this dangerous virus," he said.	p. 650
Anti-vaccine protesters harassing health care workers, patients: AHS president	Patients and staff have also been obstructed from entering hospitals, which "is uncalled for and extremely unsettling," she added.	p. 656, 658

Article	Statement	Pinpoint (MR)
Calgary Herald, Sep 3, 2021	"It is demoralizing for nurses and other health care workers working in hospitals and other health-care settings, risking burnout and COVID-19 infection, to see these people oppose vaccination efforts and interfere with access to health-care facilities."	

To:

Linda Silas[lsilas@nursesunions.ca]

From

Electronically filed / Déposé par voie électronique : 15-Aug-2022
(FYD Toronto Superior Court of Justice / Cour supérieure de justice)

Sent:

1 hr 9/9/2021 4:17:13 PM (UTC-04:00)

Subject:

RE: [EXTERNAL]RE: Enough is enough...

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

Some letters where final sentence is, “So fuck off, and ... “ and on it goes. Just appalling.
Thanks for support. And yes it does feel good – you should have seen my first draft, LoL. This is the polite, tame one...
Mike

Michael Villeneuve, RN, M.Sc, FAAN | inf. aut., M. Sc., FAAN
Chief Executive Officer | Directeur général
Executive Office | Bureau exécutif

Canadian Nurses Association | Association des infirmières et infirmiers du Canada
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From:

Linda Silas <lsilas@nursesunions.ca>

Sent:

September-09-21 4:08 PM

To:

Michael J. Villeneuve <mvilleneuve@cna-aiic.ca>

Subject:

[EXTERNAL]RE: Enough is enough...

Bonjour...wow didn’t know it was that bad...Im sharing it and we will come with a supportive message
Also checking with our folks to see if we got lots of negative comments or treats...will let you know
Doesn’t it feel good to get pissed off sometimes ☺
Stay safe
Linda

From:

Michael J. Villeneuve [mailto:mvilleneuve@cna-aiic.ca]

Sent:

September 9, 2021 3:55 PM

To:

All CNA <AICNA@cna-aiic.ca>; Amaris Poznikoff <amaris.poznikoff@gmail.com>; Brousseau, Sylvain <Sylvain.Brousseau@uqo.ca>; CNA President <president@cna-aiic.ca>; CNA President Elect <presidentelect@cna-aiic.ca>; Donna Dewar <ddewar@cna-aiic.ca>; 'Elaine Warren' <elaine.warren61@gmail.com>; Jennifer Pearce (jenniferpearce3@hotmail.com) <jenniferpearce3@hotmail.com>; Lorelei Gibson <Lorelei.Gibson@interiorhealth.ca>; 'loreleyfehr@gmail.com' <loreleyfehr@gmail.com>; Michael J. Villeneuve <mvilleneuve@cna-aiic.ca>; Nada Hammude <nhammude@cna-aiic.ca>; Nicole Letourneau <nicole.letourneau@ucalgary.ca>; Parisa Jamali <parisa.jamali@ryerson.ca>; Sheri Roach <sheri.roach@dal.ca>; 'tim.guest@bellaliant.net' <tim.guest@bellaliant.net>; 'Valerie Hughes' <vjhughes@ihis.org>; Cheryl Cusack (ccusack@arnm.ca) <ccusack@arnm.ca>; Cindy Smith (csmith@srna.org) <csmith@srna.org>; Denise Bowen (ed@rnanntnu.ca) <ed@rnanntnu.ca>; Jerome Marburg (ceo@yrna.ca) <ceo@yrna.ca>; Joy Peacock - CARNA (jpeacock@nurses.ab.ca) <jpeacock@nurses.ab.ca>; Laurie Janes (ljanes@nanb.nb.ca) <ljanes@nanb.nb.ca>; Lynn Power (lpower@crnnl.ca) <lpower@crnnl.ca>

Cc:

(rcbetker@gmail.com) <rcbetker@gmail.com>; Barb Shellian <Barb.Shellian@albertahealthservices.ca>; Velji, Karima <veljik@ontarioshores.ca>; Laurie Gottlieb, Dr. <laurie.gottlieb@mcgill.ca>; Joan Almost <joan.almost@queensu.ca>; Salma Debs-Ivall <salma.diconsulting@gmail.com>; lisa@lisalittleconsulting.ca; Cynthia Baker <CBaker@casn.ca>; Linda Silas <lsilas@nursesunions.ca>; Kathleen <kathleen.macmillan@bellaliant.net>; Victoria Marchand <president@cnsa.ca>; Chantal Leonard <cleonard@cnps.ca>; asboal@hotmail.com; rachelmariealice <rachelmariealice@gmail.com>; Lucille Auffrey <lauffrey@rogers.com>; Judith Oulton <jaoulton@gmail.com>; Christine Buckley <cbuckley@cnf-fiic.ca>; Prodan-Bhalla, Natasha L HLTH:EX <Natasha.Prodan-Bhalla@gov.bc.ca>; Jennifer Berry (jberry@gov.nu.ca) <jberry@gov.nu.ca>; Peggy White <pwhite@hobic-outcomes.ca>; Nagle Lynn <lnagle@nagleassoc.ca>; Dianne Foster Kent <dkent@longwoods.com>; Dianne Martin <dmartin@werpn.com>; Wendy Peterson <wpeterso@uottawa.ca>; Wendy Gifford <wgifford@uottawa.ca>; Wendy Nicklin <wendynicklin2189@gmail.com>

Subject:

Enough is enough...

Importance:

High

Colleagues,
FYI, our statement in response to the protests against nurses and other HCWs. Please share with your networks as you wish.

<https://www.cna-aiic.ca/en/news-room/news-releases/2021/enough-is-enough-professional-nurses-stand-for-science-bas>

Electronically filed / Déposé par voie électronique : 15-Aug-2022

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

Toronto Superior Court of Justice / Cour supérieure de justice

We are taking some heat here due to our stances, mostly tying me/us to alliances with various fascist and communist regimes, and of course revealing our “radical agenda” – none of which anyone has been able to explain to me. I cannot begin to tell you the tone of some of it, and the complexity of the chain of ideas leading to their allegations and conclusions really is Shakespearean in imagination and scope. (COVID stats all fake. COVID vaccines killing thousands around the world; all being hidden. Hospitals here are not tied up at all, it’s all fake to fuel “your” radical agenda; everyone is lying. Shall I go on?) And the vulgarity of the language and tone. Oh my...

So we have our fire-retardant suits on because this statement will draw more. We will not read too much of it... Thanks for support and sharing this as you wish. We live in dangerous, or at least very angry times, eh? Sad to see a tiny number of nurses being so vocal in support of all that.

Mike

Michael Villeneuve, RN, M.Sc, FAAN | inf. aut., M. Sc., FAAN

Chief Executive Officer | Directeur général

Executive Office | Bureau exécutif

Canadian Nurses Association | Association des infirmières et infirmiers du Canada

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To: lytwynec@gmail.com[lytwynec@gmail.com]
From: Electronically filed / Déposé par voie électronique : 15-Aug-2022
(FYD Toronto Superior Court of Justice / Cour supérieure de justice
Sent: 1 hr 9/9/2021 3:32:48 PM (UTC-04:00)
Subject: Concerns from a Nurse in Ontario

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

Thanks for your note, Sofia. The protests are disturbing indeed. We did not write to PM etc. because all the leaders have been calling out this wicked behaviour and condemning it - so they are doing their part, I think. It's appalling.

FYI at least two of the three nurses leading that tiny group have been fired and at least one is under investigation; certainly the College is well aware of them.

FYI, our statement released today: <https://www.cna-aiic.ca/en/news-room/news-releases/2021/enough-is-enough-professional-nurses-stand-for-science-based-health-care>

Thank you again for being in touch about this issue that is making us all feel perplexed and demoralized.

Mike

Michael Villeneuve, RN, M.Sc, FAAN | inf. aut., M. Sc., FAAN
Chief Executive Officer | Directeur g?n?ral
Executive Office | Bureau ex?cutif

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-----Original Message-----
From: S Lytwynec <lytwynec@gmail.com>
Sent: September 2, 2021 2:27 PM
To: Reception <reception@cna-aiic.ca>
Subject: [EXTERNAL]Concerns from a Nurse in Ontario

To whom it may concern:

I was appalled to read about the abusive & vitriolic protest outside of a B.C. hospital targeting nurses and health care staff! It is deeply disturbing to see these abusive, threatening, and unacceptable actions aimed at those who are not only our first ,but last line of defence against Covid-19 and the fourth wave.

They need public respect and support to hold them up during this time as they continue the fight against this terrible virus, despite being tired, short-staffed, and working overtime with little recognition.

The Progressive Conservative government and all federal, provincial, local and municipal governments need to step up and denounce these outrageous behaviours, publicly defend our caregivers, and keep them safe.

The "frontline nurses" leading these protests,(who may or may not be practising or even genuine,) need to be investigated and removed promptly & permanently from the professional colleges of nurses roster.

There is no room in Canada for those who advocate for misinformation and hatred toward those who are facing a fourth wave and trying to protect and care for patients and families.

Sincerely Yours,

Sofia Lytwynec, (RegN.BScN.)
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EmailfooterExternalEmail.

To: Wendy Nicklin[wendynicklin2189@gmail.com]
From: Electronically filed / Déposé par voie électronique : 15-Aug-2022
(FYD Toronto Superior Court of Justice / Cour supérieure de justice)
Sent: 1 hr 9/9/2021 8:23:29 PM (UTC-04:00)
Subject: RE: [EXTERNAL]'enough is enough

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

It's the raw, vaguely threatening vulgarity of it all, OMG Wendy. I mean I talk a lot of trash and I'm not afraid of "those" words – but when people wield them as weapons it's oddly jarring. Can you imagine closing a letter, for example, with, "So F. Off, and I hope you live in shame" – that sort of stuff. Just harsh. The underbelly of "Canadian" really has caught me off guard, I admit.

Thanks for kind support,

Mike

Michael Villeneuve, RN, M.Sc, FAAN | inf. aut., M. Sc., FAAN
Chief Executive Officer | Directeur général
Executive Office | Bureau exécutif

Canadian Nurses Association | Association des infirmières et infirmiers du Canada
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From: Wendy Nicklin <wendynicklin2189@gmail.com>

Sent: September-09-21 4:00 PM

To: Michael J. Villeneuve <mvilleneuve@cna-aiic.ca>

Subject: Re: [EXTERNAL]'enough is enough

Hi Mike,

Just read your other message about all of the verbal attacks taking aim. Too many people have gone 'off the deep end' and the situation is bringing out the worst in many. Crazy times!!

Yes, bullet proof armour, asbestos suits etc., may all be required. I'm with you!!

Take care, *Wendy*

On Thu, Sep 9, 2021 at 3:56 PM Michael J. Villeneuve <mvilleneuve@cna-aiic.ca> wrote:

Oh thank you, Wendy – that means a lot coming from you. You should have read my first version... lol. This was the more publicly acceptable one.

Hope you and Jim are well.

Mike

Michael Villeneuve, RN, M.Sc, FAAN | inf. aut., M. Sc., FAAN
Chief Executive Officer | Directeur général
Executive Office | Bureau exécutif

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From: Wendy Nicklin <wendynicklin2189@gmail.com>

Sent: September-09-21 3:51 PM

To: Michael J. Villeneuve <mvilleneuve@cna-aiic.ca>

Subject: [EXTERNAL]'enough is enough

Hi Mike,

Th
Co

Electronically filed / Déposé par voie électronique : 15-Aug-2022
Toronto Superior Court of Justice / Cour supérieure de justice

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

Take care, *Wendy*

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TAB 5

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

**UNDERTAKINGS
given at the Cross-Examination of Tim Guest held on July 21, 2022**

No.	Pg.	Q.	Specific Question	Answer
1.	7-8	6-7	To advise whether Mr. Guest's "correspondence that went back and forth between Mr. Guest and the three prior presidents of the Canadian Nurses Association" is "contained in Mr. Villeneuve's affidavit" or "in Mr. Guest's affidavit", and if not, to produce the correspondence.	Mr. Guest's correspondence to the three former CNA Presidents, Claire Betker, Barb Shellian, and Karima Velji, was sent on September 5, 2021 at 10:23AM AST. Mr. Guest's email and each of the former Presidents' responses appear as part of Exhibit 30 to the Affidavit of Michael Villeneuve sworn June 24, 2022, Motion Record, Volume 2, at pp. 931-933.

No.	Pg.	Q.	Specific Question	Answer
2.	51-52	143	To review Mr. Guest's "Facebook and LinkedIn profile from January 7, 2022 to present and simply advise whether there are any posts about COVID-19, including masking, vaccination, social distancing", and to the extent there is something responsive, as in a like, share, or comment, to produce them.	Mr. Guest has reviewed his Facebook and LinkedIn accounts and advises that the only post relating to COVID-19 is a post in which he shared the CNA and Canadian Medical Association statement relating to the healthcare workforce and burnout. A copy of this post is attached. The statement shared in this post appears at Exhibit 13 to the Mr. Guest's cross-examination.

10:06



Articles, posts & more...

All activity

Articles

Posts

Documents



Tim Guest (He/Him) • You
 CEO, Canadian Nurses Association
 2mo •



Canadian Nurses Association
 38,078 followers
 2mo •

Nurses and health-care workers are burned out, exhausted, and demoralized, and a worrying number of them are leaving their professions.

To strengthen our health workforce, CNA partnered with the [Canadian Medical Association](#) and the [The College of Family Physicians of Canada](#) to develop an HHR roadmap of solutions, which includes key measures to help recruit, and most importantly, retain nurses and health care workers in their jobs.

Read our statement: <http://ow.ly/FeX550J98Bb>



Home



My Network



Post



Notifications



Jobs

TAB 6



43 Florence Street
Ottawa, ON K2P 0W6
T: 613-237-4740, ext. 3
F: 613-232-2680

Christine Johnson
cjohnson@champlaw.ca

Our file 2443

July 21, 2022

BY EMAIL

Alexander Boissonneau-Lehner
Johnstone & Cowling LLP
44 Jarvis Street
Toronto, ON M4Y 2G8
alehner@johnstonecowling.com

Dear Counsel:

Re: CFN et al. v. CNA et al. (CFN: CV-21-00673636-0000)
Answers to Undertakings During Cross-Examination of Will Horter +
Additional Documents to Be Referenced During Plaintiffs' Examinations

Further to the cross-examination of Will Horter conducted via Zoom today, we are writing to provide you with written answers to questions put to Mr Horter. The questions for which agreement to provide answers were also follows:

Provide a copy of documents showing that Choujounian and Nagle were speaking in Washington, D.C. on January 6, 2021 as part of a “roster of events” of wider Trump-inspired protests

We have attached the following documents in answer to this undertaking:

- a. Captures of the FreedomRally2021.com website from January 2021 (as archived on the Wayback Machine website), stating that Global Frontline Nurses was part of the speaker line-up for the Freedom Rally events
- b. A PDF copy of the “MAGA Rally Guide” that was linked on the FreedomRally2021 website in January 2021, showing Global Frontline Nurses speaking as part of the MAGA Rally events on January 6, 2021
- c. A capture of the Globalfrontlinenurses.com website from January 2021, including a banner for the “Freedom Rally” and stating that the Global Frontline Nurse’s Summit “kicks off a line-up of all these great speakers”

- 2 -

Confirmation as to where online Horter viewed Nagle's speech in Washington on January 6, 2021, and provide a copy of the video if available

Mr Horter viewed the videos of the January 6, 2021 speeches by Nagle and Choujounian on the Instagram page for Nurses Against Lockdowns. We will send videos of these files separately by Dropbox link. They can also be accessed on the NursesAgainstLockdowns Instagram page here:

<https://www.instagram.com/p/CJyYnCbAXNc/?hl=en> and here

<https://www.instagram.com/p/CJyZTmaggt0/?hl=en>. A link to the video of Nagle's speech was also embedded in the BlogTO article at p. 74 of Horter's Affidavit and a link to the video of Choujounian's speech was embedded in the Toronto Sun article at p. 60 of Horter's Affidavit.

Provide a copy of Nagle's Instagram video posted from Washington on January 6, 2021, referred to and linked in the CBC article dated January 11, 2021 at Tab C (p. 47) of Horter's Affidavit

We will send a video file of Nagle's Instagram video dated January 6, 2021 by Dropbox link. It can also be viewed as part of the CBC news article here:

<https://www.cbc.ca/player/play/1843294787659/>

Confirmation as to what sources TNI and Horter relied on when making claimed about Pitter in the TNI Article that she was fired for "spewing garbage about Bill Gates using a COVID-19 vaccine to alter people's DNA")

In making this statement, Mr Horter and TNI relied on the many media reports that Pitter was no longer employed as a healthcare professional, as a result of spreading misinformation about COVID-19. With regards to the statement that she had, in particular, faced employment consequences for "spewing garbage about Bill Gates using a COVID-19 vaccine to alter people's DNA", Horter and TNI relied on the CBC article dated July 23, 2020 at p. 29 of Horter's Affidavit. This article states that Pitter was "under investigation after she used social media to spread health misinformation, including the myth vaccines cause autism and claims the coronavirus pandemic is conspiracy whose threat to public health has been exaggerated". The article then discusses a social media post by Pitter dated July 12, 2020 which states "Please listen to this very important audio recording by the President of Ghana on the evil that is going on in the name of COVID-19, masterminded by Bill Gates, Anthony Fauci, together with WHO and the Rockefeller Foundation. The document he is reading from was written 10 years ago. It was "predicted" (PLANNED) that humanity would be subjected to a global pandemic and lethal vaccines with identification capabilities, which can track and manipulate the thoughts, movements and the whereabouts of every human being". At p. 31 the article states "Some of Pitter's posts on Facebook

- 3 -

have been flagged as “false information” by the social networking site, including one post that states tech billionaire Bill Gates plans to use a COVID-19 vaccine to permanently alter people’s DNA”.

Yours truly,



Paul Champ & Christine Johnson

encl. Documents in answer to undertaking #1

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Our Nation's Capitol
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Washington, DC 20002



Bianca Gracia

President Latinos for Trump



Becky

La Trumpista



Gene Ho

Trump 2016 Photographer



Stephen Willeford

Good Guy with a Gun



Kelly SoRelle

Lawyers for Trump

Maurice Symonette
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FREEDOM RALLY

The Global Frontline Nurses 9 am

Wednesday, January 6 12 pm - 4pm

#ILoudVoice



Del Bigtree



Dr. David Martin



Ty & Charlene Bollinger



Lori Martin Gregory



Clay Clark



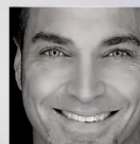
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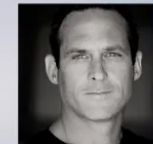
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Mikki Willis



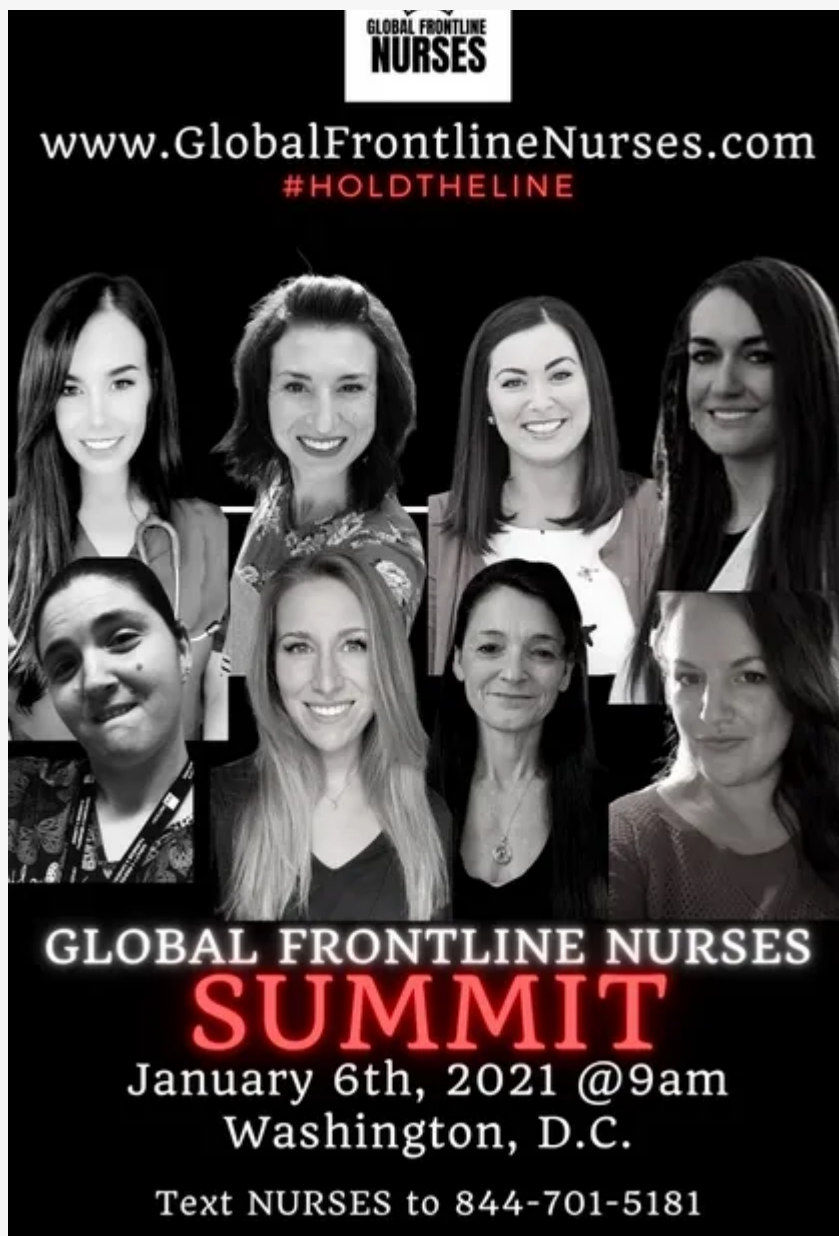
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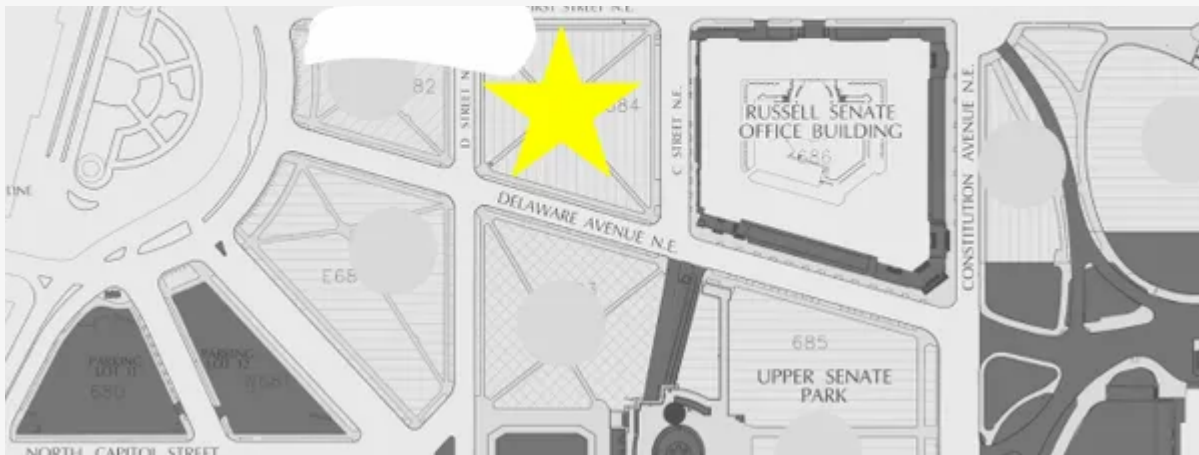
[Sign the petition](#) to preserve your right to accept, delay, or decline the COVID-19 vaccine, a product not even approved by the FDA.

You're Invited

Join us Wednesday, January 6 at the United States Capitol

for a gathering to celebrate America, freedom, health, and life with #1LoudVoice, as one nation, under God, indivisible, with liberty and justice for all!

Event Location



Join us for back-to-back rally events to hear compelling testimony
& insight from dynamic leaders as they publicly address immediate
& serious concerns related to liberty and freedom.

The Global Front-Line Nurses 9am - 10am

Freedom Speakers 10am - 12pm

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Support Health Freedom!

Help preserve health freedom. Your financial support will help
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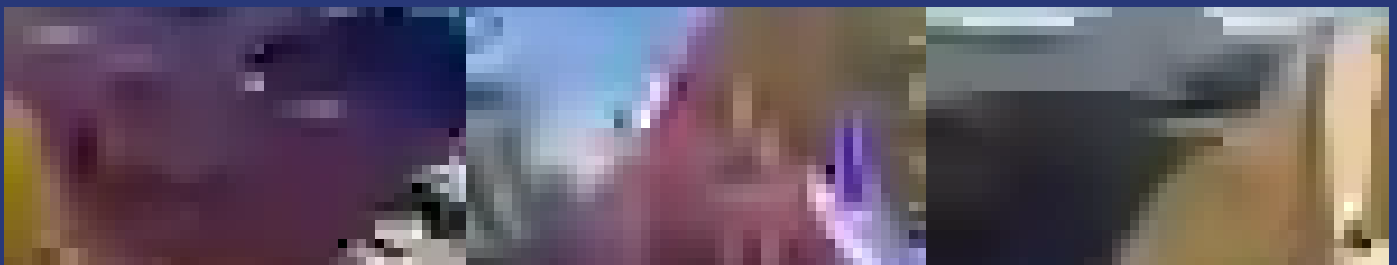


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You're Invited

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A million Patriots are expected to gather on this historic occasion to celebrate America, freedom, health, and life with #1LoudVoice, as one nation, under God, indivisible, with liberty and justice for all!



INFLUENTIAL LEADERS ADDRESS CRITICAL THREATS TO FREEDOM

Attend back-to-back rally events to hear compelling testimony & insight from featured guests as they publicly address immediate & serious



We must stand together to restore and defend such freedoms, the foundation of these being bodily sovereignty and health & medical freedoms.

Sign the petition to preserve your right to accept, delay, or decline the COVID-19 vaccine, a product not even approved by the FDA.



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FREEDOM RALLY

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Event Location