

Court File No: T-1296-23

**FEDERAL COURT**

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F I L E D	FEDERAL COURT COUR FÉDÉRALE  July 28, 2023
Jennifer Sorvisto	
Edmonton, AB	2

**BETWEEN:**

**Francesco Gabriele Qualizza, Joel Thomas William Ellis, Patrick Mercier, Jill Lyne Duchesneau, Joseph Benjamin Stewart, Eric David Faucher, Scott Peter Bacon, Stephen Troy Chledowski, Amanda Leigh Benham, Joshua Martin McCulloch, Kyle Corriveau, Joseph Daniel Eric Louis Montgrain, Dustin Shane Wiebe, Stephen WJ Morris, David Garcia Vargas, Michael Joseph Lis, Natasha Katrina Lis, Solange Sine Djoueche, Peter Vlassov, Frederic Villeneuve-Normand, Estate of Jonathan Emmerson Jenkinson, Valentin Lavrov, Marie-Eve Labonte, Jesse Dale Friesen, Tania Catherine Nordli, Andrzej Skulski, Dennis John Paul Tondreau, Emmy-Lou Laurie Forget, Dallas Alexander Flamand, Chelsea Elaine Rogal, Baron Hordo, Taylor Michael Harvie, Vanessa Rae Laroche, Jacqueline Marie France Boehme, James Paul Daniel Formosa, Kaitlyn E Campbell, Lucas Timothy Vancuren, Jermaine Sheridan Burrell, Anthony David Hiatt, Michael St-Laurent, Armand Edward A. Garner, Amit Sodhi, Camille Felix J Turgeon, Samantha Gwendolyn Styles, Carol-Ann Mary T Ouellette, Robert James Teremchuk, Nathaniel J P Tondreau, Nikola J Guy Tondreau, Lisa Pauline Leopold, Hailey Noelle Schroder, Dominique Lauzier, Valerie ~~Ouellett~~ **Ouellet**, John M Gillis, Morgan Christopher Warren, Mark Andrew Good, Sean Michael Marcotte, Mark Andrew Lolacher, Gabriel Villeneuve, Kira Anne Yakimovich, Mathieu W Petit-Marceau, Kimberly Nedra Ettel, Christopher William Rambharose, Michael Ryan Frank, Evan Jeffery McFtridge, Pierre-Elie Lasnier, Alessandru Ward Forster Brown, Danis Doiron, Carl Joseph D Rivest-Marier, Jaroslaw T Ciesinski, Stephen William Holt, Randolph Raymond Jenkins, Andrew John MacPhee, Valerie Palin-Robert, Roger Cory Stoesz, Shane Thomas Whitson,**

**Christian Kurt Carter, Matthew James Rowe, Dave Bouchard, Laurie C. Baker, Frederic Lauzier, Lucas Shane O'Connor, Laura Dianne Allan, George Vriniotis, Sienna Germaine Quirk, Charles Bruno Alexandre Turmel, Derek Marshall Sproule, Shane Michael N. Singer, Jaroslaw Grzegorz Marczewski, Christopher Nightingale Anderson, Francis Joseph Michel Archambault, Christopher Raymond Austin, John Anthony Baklinski, David Glen Barkhouse, Michael Barrette, Darrin Thomas Beaton, Bobak Beheshti, Andres Felipe Bocanegra Beltran, Nathan Kyle Johnson, Conrad Joseph Benoit, Mathieu Bernard, Brian James Bews, Michael Christopher Bill, Robert Stewart Bishop, Jefferson Malcome Bissengue, Steven Bolduc, Thomas Gill Bonnett, Charles Anthony Valmhor Borg, Patrick James Boschalk, Karla Rae Bowler, Kenneth Scott Bradley, Dwayne Armand Bratzke, Ryan Douglas Breau, Chara Loren Browne, William Frederick Bull, Mark A Calow, James Gregory Cameron, Brett Grant Gordon Campbell, Damian Ronald Cayer, Jesse Shayne Chambers, Vladimir Charnine, Shaun Kyle Charpentier, Daniel Robert Cheshire, Dave Cimon, Charles Benoit-Jean Cote, Remi Cote, Matthieu Coulombe, Rebekah Kathleen Courtney, Maverick Jeremy Joseph Cowx, Jonathan Wayne Crouch, Nicole Johnna Crowder, Bartłomiej David Cychner, Beata Margaret Czapla, Sara Darby, Brady Damien Dedam, Virgil Severin Dessouroux, Sean Robert Dixon, Robert Adam Doliwa, Daniel Pierre Drolet, Samuel Drouin, Benjamin Graham Dunbar, Matthew Alexander J. Durda, Stephen Andrew Terence Ells, Austin Karn Faulkner, Eric Michel C S Fontaine, William Joseph R Forget, Sean Michael Francis, Kory Michael Fraser, Jason Joseph Kevin Frechette, Christopher Benjamin Fuellert, Steven James Gallant, Steven Roy Gamble, Tanya Lee Gaudet, Emilie Gauthier-Wong, Tommy Gauvreau, Nicolas Alexander Gleis, Marcel Joseph G E Gobeil-Gobeil, Tammy Danielle Greening, Eugene Pieter Greyling, Kevin Clarence J Griffin, Dominic Joseph S Guenette, Darcy Wayne Hansen, Brett Nevin Wellicome, Rory Alexander Hawman, James Adam Heald, Kyle Keith Hepner, Jason Stanley Gilbert Ignatescu, Thanarajan Jesuthasan, Kevin Thomas Johnson, Gary Adam Johnston, Ryan Gregory Jones, Jamie Alexander Curtis Jorstad, Attila Stephen Kadlecsik, Dusty Lewis Kennedy, Hunter Elmer Kersey, Liam Owen Kiropoulos, Christopher Robert Knorr, Evan**

**Victor Koziel, Martin Philippe Labrosse, Gerald JN- Fritz Lafortune, Andre Lahaye, Kelly-Lee Marie Lake, Nicholas Edward Lange, Sarah-Emilie Lasnier, Dominic Joseph M. Lavoie, Tara Lavoie, Drake Michael Le Couteur, Marc LeClair, Pierre Lemay, Jonathan Joseph A. Lemire, Daniel Paul Loader, Garrett Curtis Logan, Jordan Terrence Logan, Alexandre Guy Richard Loiselle, Adam Fernand C. Lupien, Walter George Lyon, Joseph Brefni W. MacDonald, Christien Tavis Roger MacDonnell, Jean Joseph Madore, Charles Joseph J. Magnan, Andrew Robert Paul Mallory, Marylene Ginette S. Martin, Marco Mastantuono, Jamie Richard McEwen, Johannes Wouter Mulder, Tyler Edwin Neufeld, Laura Lee Nicholson, Keri Merriam Nixon, Jonathan Noel, Joshua Bruce Olson, Caroline Mary Audrey Ouellet, Joseph Anthony Papalia, Melanie Marie I. Pare, Alexandru Patularu, Joshua Alexander Pickford, Agnes Pinter-Kadlecsik, Jean-Simon Plamondon, Krister Alexander Pohjolainen, Aura A. Pon, Brody Allen Poznikoff, Stefan Prisacari, ~~Monica A~~ **Monika Anna** Quillan, Romain Racine, Dominic Laurens William Ragetli, Stephane Ratte, Bryan Thomas Richter, William Rios, Jenna Leigh Roberts, Joshua Calvin Roberts, Laurie Rose, Rory Alexander David Rosen, Sebastien Salvat, Cameron Ray S. Sanders, Carl Jean G. Savard, Torsten Schulz, Paul Russell Shapka, Blake Alexander Sheedy, Quinton James Stender, Caleb Ethan M. Stener, Gabriel-Alexandre St-Gelais, Nicolas Joseph St-Germain, Robert Christopher Stull, James Roark Suter, Dalen Drew Tanner, Justin Myles Tenhage, Jacob Cyril Theriault, Simon Bobby H Tilly, Jean-Philippe Trudel, Albert Jason Tschetter, Shelley Diane Tully, Magali Turpin, Julian Philip Tutino, Gregory Vincent-Walker, Cade Austin Walker, ~~Ashley Lynn Watson~~, Brennen Bo Anthony Watson, Benjamin Kyle Weston, Matthew Max Whicher, Joshua James White, Andrew Ernest Wilkowski, Donald James Williams, Curtis Malcom Wilson, Wade George Wilson, Andrew Dean Wychnenka, Marc Zorayan, Brandon Tyler Peter Zwicker, William H L Levi Wall, Karen Paige Nightingale, Marc-Antoine Poulin, Keegan Marsh, Ryan Michael, Thomas Patrick Hayes, James Mark Charlebois, Halston Randal Nicholson, Melissa-Jane Sarah Krieger, Gianluca Luchetta, Benjamin James Wilcox, Mark Ronkin, Serge Joseph Leo Faucher, Jacob Thomas Fidor, Lucas Gerard Ziegelbauer, Spencer Daniel Lord, Ian Ocegüera, John**

**Nesrallah, Daniel Ninian Rodrigues, Cory Jason Kruger, Stephen Young Smith, Fourat Yacoub Yousif Jajou, Anthony Bilodeau, Jonathan Michael Recoskie, Thomas L. Edwards, Lindsay Anne Mackenzie, Sarah Evelyn Laprade, Dany Pilon, James Andrew Cook, Derek John Gauthier, David Adam Dobbie, Gabrielle Charpentier, Daniel Johannes Reckman, Zachary Cleeland, Mateusz Cameron Kowalski, Tara J. MacDonald, Paul David Wilson, Brendan V. T. Lebert, Jocelyn Lamotte, Anthony J. Duke, Riley Malcolm MacPherson, Kim Noel Lauzon, Kurtis Rockefeller Rutherford, Sergiu George Candea, Jesse Henry Field, William Edward Brendon, Cameron Samuel Nobert, David Houde, Alyssa Joy Blatkewicz, Colin Perry Kaiser, Fabrice Dourlent, Cory Lance Gargin, Anita Grace Hessling, Jennifer Bethany Frizzley, David Andrew Benson, Brandon John Armstrong, Rejean Berube, Jean-Philippe Joseph Bouchard, Dhillon David Cole, Pierre-Olivier Cote-Guay, Ian M Menzies, Eric Monnin, Elliot Gamache, Nicholas Neil Lloyd Crocker, Robert Allan Henderson, **Gabriel Gilles RJ Ramsay, Devin James McKenna****

**PLAINTIFFS**

- and -

**His Majesty the King in Right of Canada, Chief of the Defence Staff General Wayne Eyre, Vice Chief of Defence Staff Lieutenant-General Frances J Allen, Lieutenant General Jocelyn J M J Paul, Vice Admiral Angus I Topshee, and Lieutenant General Eric J Kenny, Minister of National Defence, The Honourable Anita Anand, Former Deputy Minister of National Defence Jody Thomas, Surgeon General Major-General JGM Bilodeau, Chaplain General Brigadier-General JLG Belisle, Judge Advocate General Rear-Admiral Genevieve Bernatchez, and Brigadier General Liam Wade Rutland**

**DEFENDANTS**

## STATEMENT OF CLAIM

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or a solicitor acting for you are required to prepare a statement of defence in Form 171B prescribed by the Federal Courts Rules, serve it on the plaintiff's solicitor or, if the plaintiff does not have a solicitor, serve it on the plaintiff, and file it, with proof of service, at a local office of this Court

WITHIN 30 DAYS after the day on which this statement of claim is served on you, if you are served in Canada or the United States; or

WITHIN 60 DAYS after the day on which this statement of claim is served on you, if you are served outside Canada and the United States.

TEN ADDITIONAL DAYS are provided for the filing and service of the statement of defence if you or a solicitor acting for you serves and files a notice of intention to respond in Form 204.1 prescribed by the Federal Courts Rules.

Copies of the Federal Courts Rules, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO DEFEND THIS PROCEEDING, judgment may be given against you in your absence and without further notice to you.

DATE: June 21, 2023

Issued by: \_\_\_\_\_  
(Registry Officer)

Address of local office:

Rice Howard Place  
10060 Jasper Avenue  
Tower 1, Suite 530  
Edmonton, Alberta  
T5J 3R8

TO:

**HIS MAJESTY THE KING IN RIGHT OF CANADA**  
**Department of Justice Canada**

**Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Chief of Defence Staff, General Wayne Eyre  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Vice Chief of Defence Staff, Lieutenant General Frances J Allen  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Minister of Defence, The Honourable Anita Anand  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Former Deputy Minister of Defence, Jody Thomas  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Surgeon General, Major General JGM Bilodeau  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Chaplain-General, Brigadier General JLG Belisle  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Judge Advocate General, Rear Admiral G Bernatchez  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Brigadier General LW Rutland  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

**TO:**

**Commander Royal Canadian Navy, Vice Admiral AI Topshee  
Department of Justice Canada  
Floor 1, 10423 101 Street NW  
Edmonton, AB T5J 4Y8**

## RELIEF SOUGHT

1. The Plaintiffs each claim:
  - a. a Declaration that the Defendants' acts and/or omissions caused the Plaintiffs harm and constitutes a breach of the public trust;
  - b. a Declaration that the Defendant, Chief of Defence Staff, General Wayne Eyre, issued an unlawful order on October 25, 2021, in violation of established law and constitutional rights;
  - c. a Declaration that the Defendants are liable to the Plaintiffs for the damages caused by their intentional commission of unlawful acts and/or omission of a lawful duty resulting in harm to the Plaintiffs and the People of Canada;
  - d. A Declaration prohibiting the Defendants from issuing subsequent orders or directives of a substantially similar or identical nature that prohibit or further restrict individuals who are not vaccinated against COVID-19 from serving in the Canadian Armed Forces;
  - e. a Declaration that the release item 5(f) for the Plaintiffs is unlawful and shall be changed to the voluntary release item 4(c) of *King's Regulations & Orders* Chapter 15.01;
  - f. a Declaration that *KR&O* 7.16, the Chief of Defence Staff as the Final Authority of the current grievance system for the Canadian Armed Forces, is of no force or effect;
  - g. general and aggravated damages arising from the Defendants' wrongful and/or negligent conduct resulting in harm to the Plaintiffs in the amount of \$1,000,000.00, per Plaintiff;



- h. damages against the Department of National Defence (DND) and the Canadian Armed Forces (CAF) in the amount of \$350,000.00 for the failure to follow the *National Defence Act* RSC 1985 c N-5 (“NDA”), the failure to abide by the administrative policies of the Canadian Armed Forces, and the failure to apply and follow procedures of the *KR&O*;
- i. Damages for inducing breach of the compact of members with His Majesty the King, interference with contractual relations with the King, and negligence;
- j. special damages in an amount to be determined, including but not limited to future and anticipated income loss, pension loss, medical expenses and out of pocket expenses;
- k. punitive and/or exemplary damages;
- l. Damages pursuant to the *Canadian Charter of Rights and Freedoms*, Part I of the *Constitution Act 1982*, being Schedule B to the *Canada Act 1982* (U.K.) 1982 c 11 s 24(1) (“the *Charter*”);
- m. Punitive damages pursuant to the *Charter of Human Rights and Freedoms* CQLR cC-12 s 49 and the *Civil Code of Quebec* CQLR cC-1991 s 1621 (“the *Quebec Charter*”);
- n. A declaration that the Chief of Defence Staff’s conduct issuing Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs’ rights to freedom of conscience, contrary to s 2(a) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- o. A declaration that the Chaplain General’s conduct supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs’ rights to freedom of conscience, contrary to s 2(a) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;

- p. A declaration that the Judge Advocate General's conduct supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to freedom of conscience, contrary to s 2(a) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- q. A declaration that the Chief of Defence Staff's conduct issuing Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to freedom of religion and personal belief, contrary to s 2(a) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- r. A declaration that the Chaplain General's conduct supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to freedom of religion and personal belief, contrary to s 2(a) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- s. A declaration that the Judge Advocate General's conduct supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to freedom of religion and personal belief, contrary to s 2(a) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- t. A declaration that the Chief of Defence Staff's conduct issuing Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to freedom of association, contrary to s 2(d) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- u. A declaration that the Judge Advocate General's conduct supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to freedom of association, contrary to s 2(d) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;
- v. A declaration that the Chief of Defence Staff, General Wayne Eyre's conduct in issuing Directive on Vaccination ("Directive(s)") 001, 002, 002

Amendment 1 and 003 violates the Plaintiffs' rights to life, liberty and security of the person and is not in accordance with the principles of fundamental justice, contrary to s 7 of the *Charter* and is not demonstrably justifiable under s 1 of the *Charter*;

- w. A declaration that the Surgeon General, Major General JGM Bilodeau's conduct in supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to life, liberty and security of the person and is not in accordance with the principles of fundamental justice, contrary to s 7 of the *Charter* and is not demonstrably justifiable under s 1 of the *Charter*;
- x. A declaration that the Judge Advocate General, Rear Admiral G Bernatchez's conduct in supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to life, liberty and security of the person and is not in accordance with the principles of fundamental justice, contrary to s 7 of the *Charter* and is not demonstrably justifiable under s 1 of the *Charter*;
- y. A declaration that the Chief of Defence Staff, General Wayne Eyre's conduct in issuing Directive on Vaccination ("Directive(s)") 001, 002, 002 Amendment 1 and 003 violates the Plaintiffs' right to privacy and is not in accordance with the principles of fundamental justice, contrary to s 8 of the *Charter* and is not demonstrably justifiable under s 1 of the *Charter*;
- z. A declaration that the Surgeon General, Major General JGM Bilodeau's conduct in supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' right to privacy and is not in accordance with the principles of fundamental justice, contrary to s 8 of the *Charter* and is not demonstrably justifiable under s 1 of the *Charter*;
- aa. A declaration that the Judge Advocate General, Rear Admiral G Bernatchez's conduct in supporting Directives 001, 002, 002 Amendment

and 003 violates the Plaintiffs' right to privacy and is not in accordance with the principles of fundamental justice, contrary to s 8 of the *Charter* and is not demonstrably justifiable under s 1 of the *Charter*;

bb. A declaration that the Chief of Defence Staff's conduct issuing Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to equality, contrary to s 15(1) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;

cc. A declaration that the Judge Advocate General's conduct supporting Directives 001, 002, 002 Amendment and 003 violates the Plaintiffs' rights to equality, contrary to s 15(1) of the *Charter*, and this violation is not demonstrably justifiable under s 1 of the *Charter*;

dd. prejudgment and post-judgment interest;

ee. the costs of the action, including GST and other taxes applicable, on a full indemnity basis; and

ff. such further and other relief as counsel may advise and as this Honourable Court may deem just.

## **NATURE OF THIS ACTION**

2. The Defendant, Anita Anand, holds a public office as Minister of Defence since 26 October 2021.
3. The Defendant, Jody Thomas, held a public office as Deputy Minister of Defence from October 2017 to January 2022.
4. The Defendant, General Wayne Eyre, holds a public office as Acting Chief of Defence Staff as of 24 February 2021 and Chief of Defence Staff since 25 November 2021.
5. The Defendant, Major General JGM Bilodeau, holds a public office as Surgeon General since July 2020.

6. The Defendant, Brigadier General JLG Belisle, holds a public office as Chaplain General since 31 May 2021.
7. The Defendant, Vice Admiral G Bernatchez, holds a public office as Judge Advocate General since 27 June 2017.
8. The Defendant, Brigadier General LW Rutland, held a public office as Commanding Officer at 1 Mechanized Brigade Group—CFB Edmonton from July 2020 to July 2022.
9. The Defendant, Vice Admiral AI Topshee, held a public office as Commander of the Pacific Fleet in July 2018 the Commander of Maritime Forces from May 2021 and now holds a public office as Commander Royal Canadian Navy since May 2022.
10. During the Defendants' tenure in office, they engaged in malfeasance, which is defined as the intentional commission of an unlawful act or omission of a lawful duty.
11. This Canadian Armed Forces ("CAF") has abused its unique position in Canadian government for decades at the expense of the members of the CAF and the former members of the CAF (the "veterans"). This has emerged in previous cases before this Court concerning sexual misconduct and abuse, among other proven claims. In this case before the Court, the CAF's actions provide to the Court more evidence of further abuses of the power by the Chain of Command (the "CoC") by these, but not limited to, continuing actions:
  - a. ignoring express legislative limits on their actions;
  - b. accelerating and misapplying the administrative measures, specifically the remedial measures process;
  - c. claiming that the actions of the Chief of Defence Staff in military matters is beyond the jurisdiction of this Court;
  - d. ignoring the accommodation process;
  - e. allowing the physical and/or psychological torture of members under the command of CAF commissioned officers;
  - f. ignoring established law on the right to privacy;
  - g. ignoring established law on informed consent;

- h. ignoring established law on the right to choose medical treatment;
- i. ignoring established law regarding religious and spiritual belief;
- j. deliberately misinterpreting the right to bodily autonomy;
- k. abandoning safety mechanisms for assessing drugs injected its members;
- l. ignoring express legislative limits on their actions including being barred from using military members as subjects for testing new medical treatments or drugs;
- m. deliberately failing to ensure that non-commissioned and commissioned officers were fully and correctly briefed on all legal and policy issues related to the above as well as the definition of a “lawful order” with the right of any member to question the same;
- n. coercion of members, their families and children for zero to very minor risk of danger to the CAF operational readiness or the general public;
- o. failing to provide a secure and confidential system for reporting and/or acting upon abuses and wrongdoings of the CoC; and
- p. deliberately misusing the grievance system to indefinitely delay or stop any relief sought by the members.

## THE PARTIES

12. The Plaintiff, Francesco Gabriele Qualizza, is a member of the CAF and holds the rank of Sergeant. He is an analyst at the Canadian Joint Operations Command Joint Targeting and Effects in Ottawa, Ontario. He lives in Ottawa, Ontario. He has served honourably for over 16 years. Sgt Qualizza viewed the Directives as unlawful due to the violations of the *Charter*. He applied for an exemption to receiving the injections but was denied because the *Charter* was deemed “irrelevant” to the Directives. He submitted substantial documentation on several occasions outlining the potential risks of the Directives to his CoC. His well-researched and scientifically supported concerns were deemed to be “nonsense” by the Command Surgeon of his unit. Due to his partner having an adverse event following injections, along with his growing research, Sgt. Qualizza

did not accept the injections. He was subject to the remedial measures (“RM”) outlined in the Directives however he was not released despite being recommended for release under a category of 5(f)—unsuitable for further military service.

13. The Plaintiff, Joel Thomas William Ellis, is a member of the CAF and holds the rank of Captain. He is a pilot posted at 2 Canadian Forces Flying Training School at CFB Moose Jaw where he held the role of a flight instructor until October 2021. He lives in Moose Jaw, Saskatchewan. He has served honourably for over 7 years. Captain Ellis did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He has been prohibited from flying by his CoC and is being posted to Winnipeg in July 2023 as a punitive measure for submitting grievances and not accepting COVID-19 injections. Upon the death of a fellow pilot, he was denied by his CoC to attend the funeral even though there were no restrictions in place at the funeral home. Captain Ellis has not received any final returns on his grievances. He has been threatened multiple times with disciplinary measures and service-related charges due to his questioning the Directives as unlawful and against *Charter* rights. Captain Ellis is being posted to CFB Winnipeg in a non-flying role in July 2023 as a punitive measure for questioning the Directives and other blatant abuses by the CoC. The CoC at Moose Jaw has gone so far as to interfere in his new schedule to make it more onerous on his family life after the posting.
14. The Plaintiff, Patrick Mercier, is a former member of the CAF and held the rank of Captain. He was a tactical helicopter pilot posted at Canadian Forces Recruiting Group Headquarters where he held the role of managing software and supplying customer support via remote work until January of 2022. He was only three years from retirement and his full pension. He lives in Shelburne, Nova Scotia. He served honourably for over 22 years and released under a 4(c) voluntary category to avoid the stigma of a 5(f) release. He suffered from many administrative bungling events during his career that came at great cost to his career due to mismanagement by the CAF. He offered his services and skills as

a civilian contractor, but the offer was refused despite a severe shortage of personnel in the CAF. Mr. Mercier did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Mr. Mercier has not received any final returns on his grievances.

15. The Plaintiff, Jill Lyne Duchesneau, was a member of the CAF and held the rank of Lieutenant Commander. She was posted at the Naval Fleet School (Quebec) where she held the role of Deputy Commandant until February 2022. She lives in Stoneham, Quebec. She served honourably for over 21 years. Ms. Duchesneau has experienced sexual assault during her service. She did not receive any COVID-19 injections and has established natural immunity from infection. Her workplace was openly marked for others to know she chose not to receive the injections. She applied for a religious accommodation and was denied. Ms. Duchesneau released under a 4(c) category under duress due to a fear of a possible 5(f) release and its serious career ramifications. She had not intended to leave the CAF at this point in her career with her mental health requiring support upon her release due to actions of her CoC.

16. The Plaintiff, Joseph Benjamin Stewart, was a member of the CAF and held the rank of Lieutenant Colonel. He was a Logistics Officer posted at 4 Canadian Division Headquarters until June 2022. He lives in Lincoln, New Brunswick. He has served honourably for over 15 years. He chose to take a forced voluntary release category of 4(c) to protect the dignity of his service and preserve some of his benefits that would have been lost with a 5(f) release. As a senior officer, he was present for meetings where there was open and indirect discrimination towards other members of the CAF, including by a General Officer. Mr. Stewart did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a medical accommodation due to a previous health condition and was denied. Mr. Stewart has not received any final returns on his grievances.

17. The Plaintiff, Eric David Faucher, was a member of the CAF and held the rank of Corporal. He is an Avionics Systems Technician posted at Bagotville 433



Squadron. He lives in St. Jerome, Quebec. He has served honourably for over 10 years. Mr. Faucher had medical appointments booked for him without his consent. He was threatened with being put on leave without pay as well as not receiving any deployments which affected his pay and career progression. Mr. Faucher did not receive any COVID-19 injections. He applied for a Canadian Human Rights Act ("CHRA") accommodation and was denied. He was given a 5(f) release on 16 August 2022.

18. The Plaintiff, Scott Peter Bacon, is a member of the CAF and holds the rank of Lieutenant. He is an Infantry Officer posted at the Cameron Highlanders of Ottawa. He lives in Sainte-Cecile-de-Masham, Quebec. He has served honourably for over 5 years. Lt. Bacon did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation through a very thorough explanation with supporting documentation and was determined to be eligible for accommodation but was then denied due to undue hardship while others in his trade were accommodated. He was also denied parental leave placing undue stress on himself and his family. Lt. Bacon experienced numerous administrative machinations from the CoC which ultimately led to his remaining in the CAF while placing uncertainty and stress upon him and his family. Lt. Bacon has not received any final returns on his grievances.
19. The Plaintiff, Stephen Troy Chledowski, was a member of the CAF and held the rank of Major. He was ~~an Artillery Officer posted at the Royal Regiment of the Canadian Artillery School at Gagetown where he held the role of Commanding Officer until July 20, 2022~~ a Battery Commander at Headquarters Battery and Battery Commander 45 Battery until 2021. He was then Officer Commanding the Ground-Based Tiger Team until his release. He lives in Grande Prairie, Alberta. He served honourably for over 21 years. Mr. Chledowski did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation as a Pansexual Pagan and was approved. He believes it was his religious and sexual status that swayed the decision in his favour. He was released under a category of 5(f) after publicly criticizing the

COVID-19 Directives of the CAF despite have a Permanent Category (“PCat”) for medical issues which should result in a 3(b) medical release. Mr. Chledowski has not received any final returns on his grievances. He is also facing charges under *NDA s 129* for speaking out publicly against an unlawful order.

20. The Plaintiff, Amanda Leigh Benham, was a member of the CAF and held the rank of Aviator. She was an Aircraft Structures Technician posted at Cold Lake, Alberta where she held the role of air maintenance until May 1, 2022. She lives in Fort Kent, Alberta. She served honourably for over 3 years. Ms. Benham is single mother of a young son. Ms. Benham did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a *CHRA* accommodation and was denied. Ms. Benham has suffered abuse and neglect by her CoC during her service. She was to be released 5(f) however chose to release 4(c) under a voluntary release as she had found employment in a civilian role.
21. The Plaintiff, Joshua Martin McCulloch, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted at 3 Royal Canadian Regiment at CFB Petawawa. He lives in Petawawa, Ontario. He has served honourably for almost 10 years. Mr. McCulloch did not receive any COVID-19 injections and has established natural immunity from infection. Mr. McCulloch experienced being placed, with others who were not vaccinated, into an unheated tent in November 2021 under winter conditions by the CoC and were told they could have heat if they took the vaccination. He was released under the 5(f) category on May 11, 2022. Mr. McCulloch has lost substantial pension value as well as loss of income with civilian work compared to his salary and benefits as a member of the CAF.
22. The Plaintiff, Kyle Corriveau, was a member of the CAF and holds the rank of Corporal. He was an Infanteer posted at 1 Royal Canadian Regiment in Ottawa until July 21, 2022. He lives in Ottawa, Ontario. He has served honourably for over 5 years. Mr. Corriveau did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied even though others with the same religious beliefs were approved. Mr. Corriveau was kicked out of his Base apartment with

one day's notice, and, on that same day, his pay was also ceased. There had been no administrative or other process to justify these actions by his CoC and he had completed work from home as ordered. He was verbally assaulted by the CoC in a public space. Mr. Corriveau was also denied medical care for a serious head injury due to his vaccination status.

23. The Plaintiff, Joseph Daniel Eric Louis Montgrain, is a member of the CAF and holds the rank of Master Corporal. He is a Military Police ("MP") member posted at Ottawa. He lives in Gatineau, Quebec. He has served honourably for over 14 years. He applied for a religious accommodation and was denied. MCpl. Montgrain took two injections of the Moderna COVID-19 biologic despite established natural immunity from infection. He felt immense pressure from the CoC to accept the injections and delayed the first injection and then the second injection for as long as possible. The threats from his CoC stopped after the second dose.
24. The Plaintiff, Dustin Shane Wiebe, is a member of the CAF and holds the rank of Master Corporal. He is a Joint Task Force 2 Assaulter posted at Canadian Special Operations Command. He lives in Oakbank, Manitoba. He has served honourably for over 21 years. He has multiple deployments during his service. MCpl. Wiebe received two doses of the COVID-19 injections. He did not apply for a religious accommodation as he was told this would end his career in the Special Forces. He received his first dose in Canada and had a significant reaction to it. He was given his second dose while deployed on an overseas operation and had significant cardiac symptoms. His health has not recovered. MCpl. Wiebe is currently at the Transition Centre awaiting a 3(b) medical release due to injuries from his service.
25. The Plaintiff, Stephen WJ Morris, is a member of the CAF and held the rank of Major. He is the Senior Base Chaplain posted at CFB Gagetown where he holds the role of advisor to the CoC regarding morals and ethics. He lives in Oromocto, New Brunswick. He has served honourably for over 14 years. Padre Morris was suspended for one year in November 2021 for speaking out against the COVID-19 policies of the CAF. Padre Morris did not receive any COVID-19 injections

and has established natural immunity from infection. He applied for a religious accommodation and was initially denied then later had it granted. Padre Morris' team was told he was losing his position with the CAF because of his poor leadership rather the actual reason of speaking out against mandated injections and approving religious exemptions. The experience from his CoC has caused severe stress to the Padre and his family.

26. The Plaintiff, David Garcia Vargas, is a member of the CAF and holds the rank of Corporal. He is a Signal Operator posted at CFB Petawawa. He lives in Petawawa, Ontario. He has served honourably for over 11 years. Cpl. Garcia is a single father. Upon being threatened with being put on Leave Without Pay ("LWOP"), he took his first COVID-19 injections and experienced an adverse event of cardiac symptoms. The medical unit and his CoC told him to ignore this event and have a second dose. He refused the second dose. He wanted to apply for a religious accommodation but was told not to apply as he did not meet the criteria. Cpl. Vargas remains in the CAF with no RM implemented against him though he has been threatened with release for disobeying a lawful order.
27. The Plaintiff, Michael Joseph Lis, is a member of the CAF and holds the rank of Major. He is a Deputy Command Safety Officer employed at Canadian Army Headquarters. He lives in Rural Municipality of Aberdeen, Saskatchewan. He has served honourably for over 17 years. He applied for a *CHRA* accommodation and was denied despite established remote work. Major Lis received two COVID-19 injections and suffered several adverse events after each dose which have had a significant impact on his health. He has made enquiries into the lack of reporting of these types of adverse events within the CAF. Major Lis has not received any final returns on his grievances.
28. The Plaintiff, Natasha Katrina Lis, is a former member of the CAF and held the rank of Captain. She was a Logistics Officer posted to the Chief Reserves and Employer Support where she held the role of human resources administration, integrated safety and risk management, and policy development and analysis until February 1, 2022, when she released under a 4(c) category. She lives in Rural Municipality of Aberdeen, Saskatchewan. She served honourably for over

17 years. Ms. Lis did not receive any COVID-19 injections. She applied for a *CHRA* accommodation and was denied despite established remote work. Ms. Lis has not received any final returns on her grievances.

29. The Plaintiff, Solange Sine Djoueche, is a member of the CAF and held the rank of Captain. She was a Nursing Officer posted at 51 Field Ambulance where she held a leadership role as Company Commander until she was removed in January 2022. She lives in Montreal, Quebec. She has served honourably for over 22 years. Capt. Sine Djoueche received one COVID-19 injection and has established natural immunity from infection. She applied for a religious accommodation and was denied. Her unit had been without Padre support for quite some time despite requests for this support. She has been subjected to RM since October 2021. She was called back to the unit on November 25, 2022. Capt. Djoueche has not received any final returns on her grievances.

30. The Plaintiff, Peter Vlassov, is a member of the CAF and holds the rank of Sergeant. He is an Infanteer posted at the Queens Own Rifles. He lives in Burlington, Ontario. He has served honourably for over 20 years. In his unit, status on receiving the COVID-19 injections was openly asked and openly posted for everyone to see. The CoC actively encouraged coercive and threatening measures. Sgt. Vlassov asked about submitting a grievance, and he was told he could not grieve any CDS Directives. He did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation despite being told no exemptions would be given in his unit and his request never received a response. Sgt. Vlassov did not face any RM or release action.

31. The Plaintiff, Frederic Villeneuve-Normand, was a member of the CAF and held the rank of Corporal. He was a Supply Technician posted at 1 Service Battalion at CFB Valcartier until 11 January 2022. He lives in Quebec City, Quebec. He served honourably for over 3.5 years. Mr. Villeneuve-Normand did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Mr. Villeneuve-Normand was physically and psychologically punished by his CO Major Genevieve Hardy

and his Regimental Sergeant Major (“RSM”) MWO Francois Savard-Damphouse by being forced to be outside in severe winter conditions without shelter or adequate care for three consecutive months in the winter of 2021-2022. None of his fellow CAF members were required to be outside for extended periods at the time of this cruel punishment for refusing the COVID-19 injections. His peers where actively encouraged to ridicule him from inside the building while he was outside as well as when they passed him to enter or exit the building. This punishment only ended when he released under duress. Mr. Villeneuve-Normand suffers injuries to this day from the aftereffects of this treatment by his CoC.

32. The Plaintiff, Estate of Jonathan Emmerson Jenkins, was a member of the CAF and held the rank of Sergeant. He was an infantry soldier posted at 1PPLCI at CFB Edmonton until 9 January 2023. He was a combat veteran. He was released under an expedited 3(b) medical release. He lived in Edmonton, Alberta. He served honourably for over 17 years. Mr. Jenkins received two Moderna COVID-19 injections in 2021 and suffered from adverse events, including blood clots in his leg. Mr. Jenkins had known addiction issues and was released without any supports in place to ensure his well-being. He was found deceased and frozen in his bed in February 2023 in a house with no heat and no utilities. His sudden and unexpected cause of death is yet to be released by the coroner.

33. The Plaintiff, Valentin Lavrov, was a member of the CAF and holds the rank of Sergeant. He is a Vehicle Technician posted at CFB Borden. He lives in Wasaga Beach, Ontario. He has served honourably for just under 21 years. He was released under a 3(b) medical release on 11 May 2022 after his medical records were considered by release administration. Mr. Lavrov did not receive any COVID-19 injections. He already had a religious accommodation which expected to continue after October 2021. He applied for a religious accommodation for the Directives and was denied. He was told by the Padre that none were going to be approved. ~~Mr. Lavrov has not received any final returns on his harassment complaint or grievances. Mr. Lavrov’s return on his harassment complaint was there was no fault.~~

34. The Plaintiff, Marie-Eve Labonte, ~~was is~~ a member of the CAF and ~~held~~ holds the rank of Captain. She ~~was-is~~ a social worker posted at CFB Petawawa until she requested to move to CFB Valcartier to be closer to family as a single mother. She held the role of supporting the morale, efficiency, and mental health of CAF members as a social worker. She lives in ~~Quebec City~~, Quebec. She has served honourably for over 20 years. She has experienced sexual assault and other moral injuries during her service which were exacerbated by the Directives. Ms. Labonte did not receive any COVID-19 injections ~~and has established natural immunity from infection~~. She was pregnant at the time of the Directives being issued and was pressured to have the injections even on leave. At the time, she was suffering acute mental health crises with suicidal ideation. She had been recommended for a 3(b) medical release. She applied for a medical accommodation and this request was ignored with no reply.
35. The Plaintiff, Jesse Dale Friesen, was a member of the CAF and held the rank of Captain. He was a pilot and was posted at Greenwood, Nova Scotia until 5 August 2022 when he was released under a 5(f) category. He lives in Aylesford, Nova Scotia. He has served honourably for over 10 years. His vaccination status was put into MM without his consent or knowledge and was incorrect which he was told could not be corrected. Mr. Friesen did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation as well as medical/allergy accommodation and was denied. Mr. Friesen gave 8 months' notice, from before the Directives that he would have paternity leave ("PATA") for the birth of his daughter in May 2022. There were insinuations from his CoC that he was asking for leave to avoid RM for remaining without COVID-19 injections which was false. He was denied PATA that he was entitled to despite notifying his CoC of his pending request in September 2021. Mr. Friesen has not received any final returns on his grievances.
36. The Plaintiff, Tania Catherine Nordli, was a member of the CAF and held the rank of Captain. She was a medical officer posted at 1 Field Ambulance at CFB Edmonton where she held the role of military doctor until 13 June 2022. She lives

in Edmonton, Alberta. She served honourably for over 2 years. Dr. Nordli received one COVID-19 injection and suffered a visual adverse event. She applied for a religious accommodation and was denied. Dr. Nordli has not received any final returns on her grievances. Dr. Nordli was actively discouraged by her CoC from reporting adverse events of CAF members following injections with COVID-19 biologics. She was also told to not grant any medical accommodations to members who requested these accommodations for the COVID-19 biologics.

37. The Plaintiff, Andrzej Skulski, is a member of the CAF and held the rank of Sub-Lieutenant. He was a Chaplain trainee with three completed years of education and was completing the two years of internship but was denied the endorsement for completion and becoming a Chaplain Candidate by Bishop Scott McCaig on 5 April 2023 with no reasons given. He lives in Scarborough, Ontario. He has served honourably for over 11 years. Mr. Skulski did not receive any COVID-19 injections. He applied for a religious accommodation and was denied due to his faith being not sincere enough for the accommodation. He was supportive of members who were seeking religious exemptions to not take any COVID-19 biologics. Mr. Skulski has received returns on his initial grievances.
38. The Plaintiff, Dennis John Paul Tondreau, was a member of the CAF and held the rank of Major. He was an Infantry Officer with the Cameron Highlanders of Ottawa until 31 March 2023. He lives in Ottawa, Ontario. He served honourably for over 38 years and was due to be promoted to LCol and take command of his regiment. He has multiple deployments. Dr. Tondreau did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Dr. Tondreau has not received any final returns on his grievances regarding the COVID-19 policies and the actions of his CoC regarding the same. He has a grievance before the Federal Court for judicial review regarding the abusive actions of his CoC to deny him extended service and promotion with a command role.
39. The Plaintiff, Emmy-Lou Laurie Forget, is a member of the CAF and holds the rank of Corporal. She is a Human Resources Administrator posted at CFB



Winnipeg. She lives in Winnipeg, Manitoba. She has served honourably for over 3 years. Corporal Forget did not receive any COVID-19 injections and has established natural immunity from infection. She was threatened with charges several times for disobeying orders such as not disclosing her vaccination status in MM and not receiving the vaccinations. She suffered from multiple incidents at the instigation of her CoC which led to medical leave from severe anxiety and panic attacks. Every day she came into work she asked if she was vaccinated. Cpl Forget was also threatened to be made homeless if she did not comply. She was isolated and prevented from attending any social events with her unit. She applied for a *CHRA* accommodation and was denied. She was under RM with a recommended release of 5(f) however this process was never completed; and she received a phone call to come back to work at the Base in October 2022.

40. The Plaintiff, Dallas Alexander Flamand, was a member of the CAF and held the rank of Master Corporal. He was an Assaulter/Sniper posted at Special Operations Unit JTF2 at Dwyer Hill until 2021. He lives in Stittsville, Ontario. He has served honourably for over 16 years. Mr. Flamand has extensive multiple deployments. He currently holds the record for the longest sniper shot in history which happened during a deployment to Iraq. Mr. Flamand did not receive any COVID-19 injections and has established natural immunity from infection. He applied for both a religious and medical accommodation and was denied both. Mr. Flamand was slated for a 5(f) release; but this was changed to a 3(b) medical release due to several service injuries. He was denied access for medical treatment and release medical appointments to establish his full record of injuries plus he was denied access to retrieve personal belongings from his locker. He was told those items would be returned to him but after several enquiries, he has not received them. His CoC has ordered others not to speak with him despite years of comradery on the battlefield.

41. The Plaintiff, Chelsea Elaine Rogal, is a member of the CAF and holds the rank of Captain. She was a pilot trainee posted at 2 Canadian Forces Flying Training School at CFB Moose Jaw. After the Directives were issued, her training was cancelled. She lives in Moose Jaw, Saskatchewan. She has served honourably

for over 14 years. Capt. Rogal did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a religious accommodation and was denied. She was also denied any accommodation for being a mother of an infant who was still breastfeeding and was told to stop feeding the child as this form of feeding was her choice and not required. She also questioned why the Directives did not address the CAF policies regarding pregnant and breastfeeding members along with no Gender Based Analysis done on the Directives. Capt. Rogal has not received any final returns on her grievances. She has now been posted to Winnipeg in July 2023 after two years of harassment and punitive actions by her CoC.

42. The Plaintiff, Baron Hordo, is a member of the CAF and holds the rank of Captain. He is a pilot posted at 2 Canadian Forces Flying Training School where he held the role of Instructor Pilot until October 2021. He lives in Moose Jaw, Saskatchewan. He has served honourably for over 13 years. Captain Hordo received two COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Upon the death of a fellow pilot, he was denied by his CoC to attend the funeral even though there were no restrictions in place at the funeral home. He has been prohibited from flying by his CoC and is being posted to Winnipeg in July 2023 as a punitive measure for submitting grievances about COVID-19 injections and maltreatment by the CoC. He was also stopped from being hired by a civilian contractor who informed him that if he was hired, the contractor's relationship with the CAF would suffer the consequences. Captain Hordo has not received any final returns on his grievances. He has been threatened with disciplinary measures and service-related charges due to his questioning the Directives as unlawful and against *Charter* rights.

43. The Plaintiff, Taylor Michael Harvie, was a member of the CAF and held the rank of Master Corporal. He was a Combat Engineer with 2 Combat Engineer Regiment with role of a diver until 20 June 2022. He lives in Timmins, Ontario. He served honourably for over 10 years. He was released under a 5(f) category. Mr. Harvie did not receive any COVID-19 injections and has established natural

immunity from infection. He was not informed of the ability to apply for a religious accommodation. He had his name, as well as other unvaccinated members' names, placed on a visible whiteboard. This led to maltreatment and discrimination from all ranks. Mr. Harvie and six other members of his Regiment were all under administrative actions yet each one was treated differently with no consistency in application of the Directives. He was told he would receive everything from jail time or dishonourable discharge as well as being denied the return to work highly recommended by his treating physicians. Already suffering from service-related mental health issues, Mr. Harvie's health deteriorated under the coercion, maltreatment, and stress.

44. The Plaintiff, Vanessa Rae Larochelle, is a member of the CAF and holds the rank of Corporal. She is an Air Operations Support Technician posted at 442 Squadron at CFB Comox. She lives in Comox, British Columbia. She has served honourably for over 4 years. Her Class B contract was terminated early without notice on 3 March 2022. This was after she injured with a traumatic brain injury during an explosion while on duty on 18 November 2021. Her CoC demanded she not follow medical instructions to attend to the Base for unnecessary administrative errands while she was still under medical leave for her injury. Cpl. Larochelle did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a religious accommodation and was ~~denied~~ enroute for an interview with a Padre when the explosion occurred, so the accommodation process was never completed. A fellow soldier injured in the same explosion was granted a religious accommodation and treated with compassion. She was also denied the pay she was entitled to as well as additional compensation for her injury because her CoC refused to sign the paperwork to move her claim forward.

45. The Plaintiff, Jacqueline Marie France Boehme, is a member of the CAF and holds the rank of Sailor First Class. She is a Human Resources Administrator posted at HMCS CATARAQUI. She lives in Kingston, Ontario. She has served honourably for over 16 years. She is a qualified psychotherapist in the civilian workspace. SFO Boehme receive two COVID-19 injections while breastfeeding a

young infant and had a cardiac adverse event with the first dose. She also was diagnosed on 7 March 2022 with several pulmonary embolisms (blood clots) and a hemorrhage in her left lung. Four days later she was diagnosed with a lump on her thyroid. SFO Boehme was forced to choose one of three options by her CoC in the middle of several stressful events. Her request to be moved to the Supplemental Reserve was approved in 17 minutes when the process for such a transfer normally takes a minimum of 6 months and up to 2 years to complete.

46. The Plaintiff, James Paul Daniel Formosa, was a member of the CAF and held the rank of Captain. He was an Artillery Officer with 1<sup>st</sup> Regiment Royal Canadian Horse Artillery until 5 July 2022 when he was released under a 5(f) category. He lives in Ottawa, Ontario. He served honourably for over 5 years. Mr. Formosa did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied because his beliefs were linked to his conscience and not in accordance with a corporate religious authority. Mr. Formosa has not received any final returns on his grievances.
47. The Plaintiff, Kaitlyn E. Campbell, is a member of the CAF and holds the rank of Warrant Officer. She is a Signal Operator posted at Canadian Forces Recruiting Group Headquarters. She lives in Angus, Ontario. She has served honourably for over 19 years. WO Campbell did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a *CHRA* accommodation and was denied. WO Campbell had her medical privacy breached by her CoC making informal enquiries through contacts at the Base Hospital. After this conversation with the Base Hospital, she was told nothing in her medical record allowed for a medical exemption despite her concerns with a familial cardiac history. Her mental health declined during this period of pressure from her CoC to accept COVID-19 injections. She was subject to RM but not released. WO Campbell has not received any final returns on her grievances.
48. The Plaintiff, Lucas Timothy Vancuren, is a member of the CAF and holds the rank of Sergeant. He is an Infanteer posted at Royal Regina Rifles. He lives in Regina, Saskatchewan. He has served honourably for over 32 years. Sgt.

Vancuren was harassed about the COVID-19 policies well before the Directives, including being told he would receive jail time, embarrassing him by placing a soldier of lower rank in command above him, told the unvaccinated could not be trusted and dishonorable discharge. Sgt. Vancuren applied for a religious accommodation and was denied. He requested a 3(b) medical release and remains in that process. He was denied his request to be transferred to the Supplemental Reserve.

49. The Plaintiff, Jermaine Sheridan Burrell, was a member of the CAF and holds the rank of Captain. He was an Artillery Officer with the 1<sup>st</sup> Royal Canadian Horse Artillery until 4 July 2022. He was released under the 5(f) category. He lives in Eden, Manitoba. He served honourably for over 8 years. Mr. Burrell did not receive any COVID-19 injections. He applied for both *CHRA* and medical accommodations and was denied. Mr. Burrell has not received any final returns on his grievances.

50. The Plaintiff, Anthony David Hiatt, was a member of the CAF and held the rank of Master Corporal. He was an MP at 2 MP Regiment at CFB Petawawa until 31 July 2022. His request for his release to be put on hold pending further direction from the CDS was denied. He lives in Edmonton, Alberta. He served honourably for over 18 years. Mr. Hiatt did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Mr. Hiatt has calculated that he suffered losses of over \$1.5 million dollars in lost income and pensionable service.

51. The Plaintiff, Michael St-Laurent, was a member of the CAF and held the rank of Aviator. He was an Air Operation Support Technician at CFB Montreal until 7 June 2022. He lives in Notre-Dame-du-Nord, Quebec. He served honourably for 3 years. Mr. St-Laurent did not receive any COVID-19 injections. He had a known cardiac condition which required blood thinners. His CoC laughed at him and told his heart was fine. His pay was not fully paid and on time and he was denied a promotion in rank. He was also under treatment for service injuries to his ankles. He was told he would be forced onto unpaid leave. He never received any RM and was told he was released under a 5(f) category by a case manager

from Veterans Affairs Canada (“VAC”). He was not given any release paperwork or sent for the release process including medical examination.

52. The Plaintiff, Armand Edward A. Garner, was a member of the CAF and held the rank of Corporal. He was an Aviation Systems Technician at 8 Wing CFB Trenton until 21 July 2022 despite having cardiac surgery on 14 July 2022. He lives in Madoc, Ontario. He served honourably for over 16 years. Mr. Garner received one dose of Moderna COVID-19 injection and was diagnosed with atrial fibrillation which required surgical intervention. This adverse event was not reported by the CAF medical service. He applied for a medical accommodation and was denied. Mr. Garner was released without appropriate supports and release paperwork completed for the cardiac adverse event nor his multiple service-related injuries.
53. The Plaintiff, Amit Sodhi, is a member of the CAF and holds the rank of Corporal. He is a Human Resources Administrator with the Black Watch Royal Highland Regiment. He lives in Dollard-des-Ormeaux, Quebec. He has served honourably for over 19 years. His CoC tried to expedite RM before he began PATA for 37 weeks despite the Directives not supporting these actions. Cpl. Sodhi submitted 33 questions and met with a CAF immunologist who was only able to answer one question with a vague reference. Cpl. Sodhi did not receive any COVID-19 injections. He applied for an accommodation under medical, religious and *CHRA* and was denied. He has had no RM measures.
54. The Plaintiff, Camille Felix J. Turgeon, was a member of the CAF and held the rank of Sergeant. He was an Infanteer posted at CFB Valcartier as an instructor until 4 April 2022 as a 3(b) medical release. He lives in Donnacona, Quebec. He has served honourably for over 14 years. Mr. Turgeon received one dose of the COVID-19 injections but was recorded as unvaccinated as the MM system did not have an option for one dose. He was threatened with s 126 of the NDA, dismissal and administrative action that would interfere with his 3(b) release. He was pressured by CoC to accept a 5(f) for not vaccinating or to opt for a 4(c) voluntary release thereby denying him the benefits of a medical release. He was subject to RM though the Recorded Warning (“RW”) was removed from his file

and the Counselling & Probation (“C&P”) was never officially processed after the meeting with his CoC. This action caused undue stress on Mr. Turgeon.

55. The Plaintiff, Samantha Gwendolyn Styles, is a member of the CAF and holds the rank of Corporal. She is a Financial Services Administrator posted to 450 Tactical Helicopter Squadron at CFB Petawawa. She lives in Petawawa, Ontario. She has served honourably for over 3 years. Cpl. Styles did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a medical accommodation due to a concerning medical condition that could contraindicate the available biologics and was granted 6 months to meet with a specialist. She did experience the symptoms she expected post-vaccination upon infection with the virus.
56. The Plaintiff, Carol Ann Mary T. Ouellette, is a member of the CAF and holds the rank of Master Corporal. She is a Material Management Technician posted at CFB Greenwood. She lives in Melvern Square, Nova Scotia. She has served honourably for over 12 years. MCpl. Ouellette did not receive any COVID-19 injections and has established natural immunity from infection. She has an increased risk of blood clotting from a medical condition prior to COVID-19. Despite specialist medical advice, she was denied a medical accommodation. She then applied for a *CHRA* accommodation and was denied. She witnessed tears, disarray, and anxiety among her subordinates over being forced to accept vaccination. There are RM on her record, but she is being evaluated for a 3(b) medical release which has been in the system since 2018 rather than the threatened 5(f).
57. The Plaintiff, Robert James Teremchuk, was a member of the CAF and held the rank of Captain. He was a highly decorated pilot posted at the Royal Military College where he held the role of Squadron Commander until 6 July 2022 under a 5(f) category just two months short of his restricted release period to completed to avoid the financial penalty of releasing before that time. He was denied a request to work in office only to avoid the financial debt. He lives in Kingston, Ontario. He has served honourably for over 14 years. Mr. Teremchuk did not

receive any COVID-19 injections. He applied for a religious accommodation and was denied. Mr. Teremchuk has not received any final returns on his grievances.

58. The Plaintiff, Nathaniel J.P. Tondreau, is a member of the CAF and holds the rank of Corporal. He is a Combat Engineer with 33 Combat Engineer Regiment. He lives in Orleans, Ontario. He has served honourably for over 9 years. Cpl. Tondreau did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He did not receive any information or direction from his CoC on completing a request for accommodation. He submitted a request for a voluntary release to avoid a 5(f) release on 9 December 2021. He has no contact with his CoC to deal with this release and is prohibited from entering Government of Canada buildings to make enquiries. Cpl. Tondreau has not received any final returns on his grievances.

59. The Plaintiff, Nikola J. Guy Tondreau, was a member of the CAF and held the rank of Corporal. He is a Combat Engineer posted at 33 combat Engineer Regiment until 16 October 2022. He lives in Orleans, Ontario. He has served honourably for over 14 years. Mr. Tondreau did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Following this request for accommodation, he was placed on RM for a 5(f) release. He then submitted for a 4(c) voluntary release to avoid the 5(f) on his record. Mr. Tondreau has not received any final returns on his grievances.

60. The Plaintiff, Lisa Pauline Leopold, is a member of the CAF and holds the rank of Master Corporal. She is a Human Resources Administrator with 3 Military Police Regiment Bedford. She lives in Truro, Nova Scotia. She has served honourably for over 15 years. She was pregnant when the Directives came into effect and would be going on maternity leave ("MATA"). MCpl. Leopold did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a religious accommodation and was denied. She applied for CHRA accommodation on the grounds of sexual discrimination and was denied. She



was denied medical leave for her mental health despite a civilian doctor ordering it for her. MCpl. Leopold has not received any final returns on her grievances.

61. The Plaintiff, Hailey Noelle Schroder, was a member of the CAF and held the rank of Private (Basic). She was in training for the Electric-Optronics Technician trade at the Royal Canadian Electrical and Mechanical Engineers (“RCEME”) School until March 2022. She lives in Petawawa, Ontario. She served honourably for over 5 years. Ms. Schroder was the victim of a heinous sexual assault by an instructor during Basic Training. This experience along with a knee injury had Ms. Schroder headed for a 3(b) medical release. After harassment by her CoC, Ms. Schroder attempted suicide and was placed on medical leave but was still pulled into meeting rooms twice a week for lectures on her conduct. The CoC also interfered with a posting to a Transition Centre so that Ms. Schroder could be posted with her husband and family leaving Ms. Schroder in CFB Borden and her family at CFB Petawawa. Ms. Schroder received one dose of COVID-19 injection and has established natural immunity from infection. She applied for a religious accommodation and was denied. Following RM, she requested a 4(c) voluntary release to expedite her expected 3(b) medical release and she was denied this voluntary release. After a second request, it was approved leaving her denied the supports and benefits of medical release.
62. The Plaintiff, Dominique Claude Marguerite Lauzier, was a member of the CAF and held the rank of Lieutenant Commander. She was a Logistics Officer posted at the naval Reserve Headquarters until 2 March 2022 when she was released early under a 4(c) category to avoid ending her career with a 5(f) category. She was only given 30 days to complete a 6-month process while maintaining her usual full-time duties. She lives in Quebec City, Quebec. She has served honourably for over 21 years. She was being evaluated for a 3(b) medical release when the Directives were issued. Ms. Lauzier did not receive any COVID-19 injections and has established natural immunity from infection. She observed many occasions where medical privacy was breached for herself and others as no efforts were made to ensure medical information was kept secure.

She applied for a religious accommodation and was denied not by her CO as per the Directive but by Rear Admiral (now Vice Admiral) Topshee.

63. The Plaintiff, Valerie ~~Ouellet~~ Ouellet, was a member of the CAF and held the rank of Officer Cadet. She was a Nursing Officer posted to CFB Bagotville until 11 August 2022 under a 5(f) release in less than 2 weeks. She lives in Jonquiere, Quebec. She has served honourably for over 6 years. She had severe reactions to multiple vaccinations in Basic Training, including cardiac issues. She has received commendations for her work while also being subject to Unit Disciplinary Investigations (“UDI”) for which she never told the reason and was cleared of wrongdoing at the conclusion. She was denied pay and promotion despite contract proof to support it. Ms. ~~Ouellet~~ Ouellet did not receive any COVID-19 injections and has established natural immunity from infection. She has not received any final returns on her grievances.
64. The Plaintiff, John M. Gillis, is a member of the CAF and holds the rank of Captain. He is a pilot posted at 427 Special Operations Aviation Squadron at CFB Petawawa until 8 August 2023 under a 4(c) voluntary release. He lives in Petawawa, Ontario. He has served honourably for over 22 years. Mr. Gillis did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He was told by his CO that only two religions were acceptable for any exemptions. He was required to deal with the Directive despite being on PATA and therefore not required to do anything until after it was completed. Mr. Gillis has not received any final returns on his grievances.
65. The Plaintiff, Morgan Christopher Warren, was a member of the CAF and held the rank of Warrant Officer. He was within the realm of being promoted to Master Warrant Officer when the Directives were issued. He was with the Princess Patricia Canadian Light Infantry posted at CFB Edmonton where he held the role of Quarter Master until 12 November 2021 when he was released very quickly under a 5(f) category. He lives near Grande Prairie, Alberta. He served honourably for over 22 years. Mr. Warren did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a

religious accommodation and was denied. Mr. Warren has not received any final returns on his grievances.

66. The Plaintiff, Mark Andrew Good, was a member of the CAF and held the rank of Major. He was Electrical and Mechanical Engineering Officer posted at CFRB Hamilton as an Officer Commanding (“OC”) until 11 February 2022. He lives in Cambridge, Ontario. He served honourably for over 29 years. He was deprived of a career trajectory likely leading to Colonel with the associated pay, benefits, and pension. Mr. Good did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied. Mr. Good has not received any final returns on his grievances.
67. The Plaintiff, Sean Michael Marcotte, was a member of the CAF and held the rank of Master Corporal. He is an Armoured Soldier posted with Lord Strathcona’s Horse at CFB Edmonton until 5 July 2022 under a 5(f) release. He lives in Edmonton, Alberta. He served honourably for over 9 years. Mr. Marcotte did not receive any COVID-19 injections. He has never been ill with COVID-19. He applied for a *CHRA* accommodation and was denied by a review board led by Brig General (then Colonel) LW Rutland. Mr. Marcotte was left without support or information to continue with his mental health treatment.
68. The Plaintiff, Mark Andrew Lolacher, was a member of the CAF and held the rank of Captain. He was an Infantry Officer posted at 3<sup>rd</sup> Battalion Princess Patricia’s Canadian Light Infantry (“3PPCLI”) until 1 March 2022. He lives in Clyde, Alberta. He served honourably for over 16 years. He was diagnosed and was being treated for Post-Traumatic Stress Disorder and Major Depressive Disorder during the COVID response. He was being evaluated for a possible 3(b) medical release due to these injuries from combat operations. Mr. Lolacher did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and **a *CHRA* accommodation by memo and** was denied by a Brigade board convened on authority given to the Brigade Commander by himself, Brig General (then Colonel) LW Rutland. Mr. Lolacher’s many expressions of concern about his privacy were ignored. Mr. Lolacher has not received any final returns on his grievances.

69. The Plaintiff, Gabriel Villeneuve, was a member of the CAF and held the rank of Master Corporal. He was an Infanteer posted 3<sup>rd</sup> Battalion Royal 22<sup>nd</sup> Regiment (“R22R”) at CFB Valcartier until 13 January 2022. He lives in Saint-Brigitte-de-Laval, Quebec. He has served honourably for over 13 years. Mr. Villeneuve did not receive any COVID-19 injections and has established natural immunity from infection. He was told his pay would be cut if he did not comply with the Directives. He applied for a 4(c) voluntary release as the Directives went against his personal values.
70. The Plaintiff, Kira Anne Yakimovich, is a member of the CAF and holds the rank of Lieutenant Commander. She is a Marine Systems Engineering Officer posted at CFB Esquimalt. She lives in Victoria, British Columbia. She has served honourably for over 17 years. Lt. Comm. Yakimovich did not receive any COVID-19 injections. She was subject to RM. She applied for a *CHRA* accommodation and was denied by Vice Admiral (then Rear Admiral) Angus I Topshee where he stated in his written decision that there was no right to bodily autonomy in the CAF. Lt. Comm. Yakimovich has received an External Military Grievance Committee report on her grievances about the Directives and she was found to be aggrieved on several grounds including the use of administrative measures being unfounded for the Directives. Her grievance is now with the Final Authority, General Wayne Eyre CDS.
71. The Plaintiff, Mathieu W. Petit-Marceau, was a member of the CAF and held the rank of Master Corporal. He was a former Special Forces Operator who posted to Canadian Forces Recruiting Centre Quebec Detachment Montreal where he held the role of Recruiter until 29 April 2022. He lives in Ogden, Quebec. He served honourably for over 26 years with multiple deployments. The Directives brought ostracization and humiliation to him. He personally knows 3 people who suffered from adverse cardiac events after vaccination. Mr. Petit-Marceau did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was offered a 4(a) release with a 30-day release timeline. He accepted the category but extended the release date to deal with the many

physically and mentally demanding deployments resulting in injuries which required professional treatment before he left.

72. The Plaintiff, Kimberly Nedra Ettel, is a member of the CAF and holds the rank of Captain. She has been a Logistics Officer and is now posted at the Transition Centre CFB Wainwright. She lives in Wainwright, Alberta. She has served honourably for over 30 years. Capt. Ettel did not receive any COVID-19 injections. She was subject to RM despite putting in for a voluntary release within a few weeks of Directive 001. She applied for a religious accommodation and was denied. Capt Ettel has not received any final returns on her grievances.
73. The Plaintiff, Christopher William Rambharose, was a member of the CAF and held the rank of Warrant Officer. He was Special Forces Operator posted at Canadian Special Forces Command until 19 April 2022. He lives in Stittsville, Ontario. He served honourably for over 20 years. Mr. Rambharose did not receive any COVID-19 injections. His CoC refused to recognize a medical exemption from a civilian doctor or any of his medical history to not receive any COVID-19 injections. His medical history was openly shared on the Base and spread to the community where he was approached by the press about his treatment as well as treatment of others. He applied for an accommodation on medical, religious and *CHRA* grounds and never received an official answer.
74. The Plaintiff, Michael Ryan Frank, was a member of the CAF and held the rank of Captain. He was an Infantry Officer with PPCLI posted at 1 Battalion CFB Edmonton then moved to the Transition Centre until 31 March 2022. He was released under category 3(b) for life changing injuries sustained during his service. He lives in St. Albert, Alberta. He has served honourably for over 23 years. Mr. Frank did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was ~~approved. denied. Mr. Frank has not received any final returns on his grievances.~~
75. The Plaintiff, Evan Jeffrey McFatrige, was a member of the CAF and held the rank of Master Sailor. He was a Sonar Operator and posted to the Naval Fleet School (Atlantic) as an Instructor until 8 April 2022 when he took a 4(c) voluntary

release. He lives in Enfield, Nova Scotia. He has served honourably for over 14 years. Mr. McFatridge received one dose of the COVID-19 injections to preserve his income for his family. He applied for a religious accommodation and was denied. He never received any of the Directives or other official documents through official channels but instead through social media and informal channels. Mr. McFatridge has not received any final returns on his grievances.

76. The Plaintiff, Pierre-Elie Lasnier, is a member of the CAF and holds the rank of Second Lieutenant. He is a student pilot posted at 2 Canadian Forces Flying Training School. He lives in Bushell, Saskatchewan. He has served honourably for over 8 years. 2Lt. Lasnier did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was granted one. His CoC then instigated RM because student pilots cannot be accommodated. He was also subject to frequent inspections in his quarters, made to pointless essays, called to his supervisor's office just to be told there was no change in his status, and he was made to remove a hobby that helped him fill his time sitting in the barracks. His mental health deteriorated under this constant barrage. 2Lt Lasnier has not received any final returns on his grievances.

77. The Plaintiff, Alessandru Ward Forster Brown, was a member of the CAF and held the rank of Corporal. He was an Armoured Soldier posted with Lord Strathcona's Horse at CFB Edmonton until 11 April 2022 when his 5(f) release became a 3(b) medical release. He lives in Legal, Alberta. He has served honourably for over 11 years. Mr. Brown did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied because he did not establish on a balance of probabilities that he would come to religious harm by taking the injections, according to the opinion Brig. Gen. (then Colonel) LW Rutland.

78. The Plaintiff, Danis Doiron, was a member of the CAF and held the rank of Corporal. He was an Infanteer with the North Shore New Brunswick Regiment at Miramichi. He lives in Brantville, New Brunswick. He served honourably for over 3 years. Cpl. Doiron received two COVID-19 injections. In the weeks that

followed the first injection, a small mass was found on his kidney. Following the second injection, he has had cardiac symptoms. He was not told that he could apply for an accommodation. He requested a voluntary release which occurred on 15 July 2022.

79. The Plaintiff, Carl Joseph D. Rivest-Marier, is a member of the CAF and holds the rank of Master Corporal. He is a Signal Operator posted with the PPCLI at CFB Edmonton. He lives in Gibbons, Alberta. He has served honourably for over 12 years. MCpl. Rivest-Marier did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He requested a voluntary release that was later requested to be withdrawn. The CoC submitted a request for a 5(f) release ten days later.
80. The Plaintiff, Jaroslaw T. Ciesinski, is a member of the CAF and holds the rank of Captain. He is a RCEME officer posted at Canadian Forces Support Group (Ottawa-Gatineau) in the role of Adjutant responsible for administration of all military personnel. He lives in Ottawa, Ontario. He has served honourably for over 19 years. Capt. Ciesinski did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied with a justification from a religion that was not in any way associated with the one he practices. He was refused a medical exemption after confirmed infection with COVID-19 plus auto-immune disease and several potentially cancerous growths requiring investigation. Capt. Ciesinski has not received any final returns on his grievances.
81. The Plaintiff, Stephen William Holt, is a member of the CAF and holds the rank of Captain. He is an Engineer Officer posted to 1 Engineer Support Unit. He lives in Kingston, Ontario. He has served honourably for over 16 years. Capt. Holt did not receive any COVID-19 injections and had several concerns regarding the legality and ethics of the Directives which, among other issues, violated several CAF policies and ethics. He was diagnosed with Lyme Disease Syndrome ("syndrome") one month before Directive 001 following a deployment to Latvia. One of the components of this syndrome is carditis. The recovery from the syndrome is long and complex requiring very specialized care which he would

lose if released under a category 5(f). He intended to apply for a medical accommodation but was delayed by referrals and appointments with specialists. He received no RM. Capt. Holt awaits a 3(b) medical release.

82. The Plaintiff, Randolph Raymond Jenkins, is a member of the CAF and holds the rank of Sergeant. He is a Supply Technician posted at Calgary. He lives in Calgary, Alberta. He has served honourably for over 16 years. Sergeant Jenkins received two COVID-19 injections prior to the Directives and has established natural immunity from infection. He refused to attest in a widely available forum which reveals his personal medical information. He applied for a religious accommodation and was denied. He applied for a *CHRA* accommodation and was denied. He was subject to RM for refusing to attest which were stopped when he was forced to reveal his status to his CO.
83. The Plaintiff, Andrew John MacPhee, is a member of the CAF and holds the rank of Sailor First Class. He is a Human Resources Administrator posted to CFB Halifax. He lives in Milford, Nova Scotia. He has served honourably for over 15 years. SFC MacPhee received a dose of Johnson & Johnson COVID-19 injection under fear of losing his home and income. He has established natural immunity from infection. He applied for a religious accommodation and was denied. His mental health was openly discussed within his unit without his consent with no consequences for breaching his privacy. His mental health deteriorated under the pressure and mistreatment of the CoC to the point of suicidal ideation and required medical leave to receive the help needed. SFC MacPhee has not received any final returns on his grievances.
84. The Plaintiff, Valerie Palin-Robert, is a member of the CAF and hold the rank of Corporal. She is a Supply Technician at 1 Service Battalion at CFB Edmonton. She lives in Morinville, Alberta. She has served honourably for over 7 years. She was a pregnant then breastfeeding mother at the time the Directives were issued. Ms. Palin-Robert did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a *CHRA* accommodation and was denied. She requested a temporary medical accommodation due to breastfeeding and was denied. The CoC for Cpl. Palin-Robert called her civilian



Ob/Gyn without her consent to have her leave until delivery cancelled so that they could implement RM. She was also charged for being Absent Without Leave while she was in an appointment with her Ob/Gyn. Despite medical instructions to not pursue any actions against her, and let her be on medical/MATA leave, her CoC scheduled a Summary Trial right before her leave. She was in hospital the day of the Summary Trial in threatened pre-term labour due to stress. She submitted a request for early MATA to stop the harassment. Her CoC denied her legislated maternity leave. Ms. Palin-Robert has not received any final returns on her grievances.

85. The Plaintiff, Roger Cory Stoesz, is a member of the CAF and holds the rank of Captain. He is a Chaplain posted to 37 Signals Regiment. He lives in Saint John, New Brunswick. He has served honourably for over 4 years. He advocated for CAF members to have their privacy protected as well as their rights regarding vaccination respected. The Chaplain General threatened career implications for any chaplain who did not comply with the Directives. Padre Stoesz did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He was placed on RM.
86. The Plaintiff, Shane Thomas Whitson, was a member of the CAF and held the rank of Corporal. He was a Medical Technician. He lives in ~~Medicine-Hat Fort Saskatchewan~~, Alberta. He served honourably for over 7 years. Mr. Whitson did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He requested a 4(c) voluntary release after coming under RM upon his return from PATA. He released on 21 December 2022. Mr. Whitson has not received any final returns on his grievances.
87. The Plaintiff, Christian Kurt Carter, was a member of the CAF and held the rank of Master Corporal. He was an Information Systems Technician posted at 7 Communications Group until 22 June 2022 only few months short of his pension. He lives in Ottawa, Ontario. He has served honourably for over 19 years with multiple deployments. He was threatened by his CoC that he would lose his medals and released under a 5(f) category within 30 days. Mr. Carter did not receive any COVID-19 injections. His release medical notes are missing several

important pieces of information related to injuries he suffered during service. He received no indication what happened to these notes. Mr. Carter has not received any final returns on his grievances.

88. The Plaintiff, Matthew James Rowe, is a member of the CAF and holds the rank of Captain. He is a Pilot posted at 417 (Combat Support) Squadron at CFB Cold Lake. He lives in Cold Lake, Alberta. He has served honourably for over 24 years. He was told that the Squadron becoming operationally ineffective due to the Directives was known and accepted by all levels of the CoC. Capt. Rowe did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He was subject to RM but was retained with Directive 003 when medical needs delayed his 5(f) release. Capt. Rowe has not received any final returns on his grievances.
89. The Plaintiff, Dave Bouchard, was a member of the CAF and held the rank of Master Corporal. He was an Aviation Systems Technician then posted at Canadian Forces Leadership and Recruit School as an Instructor at CFB St. Jean. He lives in Saint-John-sur-Richelieu. He has served honourably for over 13 years with a release on 18 July 2022 under a 5(f) category. He was told not accepting injections would result in him being placed onto LWOP or charged with an offense; neither of these happened. Mr. Bouchard did not receive any COVID-19 injections.
90. The Plaintiff, Laurie C. Baker, was a member of the CAF and held the rank of Master Corporal. She was an Aviation Systems Technician posted at 401 Squadron at CFB Cold Lake until 6 July 2022. She lives in Cold Lake, Alberta. She served honourably for over 13 years. Ms. Baker did not receive any COVID-19 injections. She applied for a *CHRA* accommodation and was denied. Ms. Baker has not received any final returns on her grievances.
91. The Plaintiff, Frederic Lauzier, was a member of the CAF and held the rank of Corporal. He was an Infantry Soldier with R22R posted to the Transition Centre pending a 3(b) medical release until 5 January 2022. He lives in Quebec City, Quebec. He has served honourably for over 13 years. Mr. Lauzier did not receive

any COVID-19 injections. He was very pressured to follow the Directive even though he was within 30 days of releasing at the time.

92. The Plaintiff, Lucas Shane O'Connor, is a member of the CAF and holds the rank of Sailor First Class. He is a Marine Technician posted at Maritime Operations Group 5 Headquarters at CFB Halifax. He lives in Halifax, Nova Scotia. He has served honourably for over 12 years. SFC O'Connor received 2 COVID-19 injections. Prior to his first dose, he was harassed onboard ship. On one day alone, he was called 11 times to different locations over a general loud speaker for all to hear. This happened on several other occasions. SFC O'Connor became a subject of ridicule by others for this treatment. He was posted to shore duty immediately after he complied with the Directives. There were approximately 20 other members assigned to the room. He also received RM for not complying with the Directive.
93. The Plaintiff, Laura Dianne Allan, is a member of the CAF and holds the rank of Master Sailor. She is a Marine Engineer Mechanic posted at CFB Esquimalt. She lives in ~~Duncan~~ Victoria, British Columbia. She has served honourably for over 13 years. MS Allan did not **want to** receive any COVID-19 injections but was willing to do so once she was no longer nursing her child. Her CoC told her to wean her infant over Christmas leave to demonstrate a serious step towards becoming vaccinated. **She took one COVID-19 injection and received immediate medical care requiring an ambulance.** MS Allan was denied the field portion of a leadership training course she requires for promotion. She applied for a *CHRA* accommodation, and it was denied as a medical accommodation.
94. The Plaintiff, George Vriniotis, was a member of the CAF and held the rank of Lieutenant Colonel. He was a Public Affairs Officer posted to the Assistant Deputy Minister (Public Affairs) in Ottawa until January 2022. He lives in Ottawa, Ontario. He served honourably for over 20 years. He was due to be promoted to Colonel upon returning from a posting in Washington, DC, USA. Mr. Vriniotis found himself in an impossible situation as a CO when the CoC stated any room he entered had to be cleared and continual assessments of his job performance. He released under duress with release category 4(c) to avoid the consequences

of a 5(f) category after a highly decorated career. Mr. Vrinotis did not receive any COVID-19 injections. He applied for a religious accommodation and was denied.

95. The Plaintiff, Sienna Germaine Quirk, is a member of the CAF and holds the rank of Corporal. She is a Material Management Technician posted at the Basic Logistics Training Cell at CFB Halifax. She lives in Lower Sackville, Nova Scotia. She has served honourably for over 4 years. Cpl. Quirk did not receive any COVID-19 injections and has established natural immunity from infection. She became infected while competing at the World Military Games in Wuhan, China. Cpl. Quirk experienced threats towards her property and safety if she refused to be vaccinated. She was also one of the members posted to a room on shore with approximately 20 other people. The military leadership would use the isolation of the building to hold meetings with members to coerce them into compliance by disclosing who had received RM and then complied as well as who had made a request for accommodation and the outcome. She applied for a *CHRA* accommodation and was denied. Despite receiving RM, Cpl. Quirk was not released and remains in service.

96. The Plaintiff, Charles Bruno Alexandre Turmel, was a member of the CAF and held the rank of Captain. He was an Electrical and Mechanical Engineering Officer posted at CFB Comox as the Wing Maintenance Officer until 1 April 2022 with a 5(f) category. He lives in Courtenay, British Columbia. He served honourably for over 10 years. Mr. Turmel did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Mr. Turmel sought assistance with mental health issues and was told by medical staff that the solution was to be vaccinated and no other treatment was necessary. He has struggled to adapt to civilian life after being denied the usual minimum 6-month transition process for releasing CAF members.

97. The Plaintiff, Derek Marshall Sproule, was a member of the CAF and held the rank of Petty Officer Second Class. He was a Port Inspection Diver posted HMCS CABOT in St. John's Newfoundland until 30 June 2022 when he was released under a 4(c) category. He lives in Sturgeon County, Alberta. He has

served honourably for over 22 years. He had 2.5 years until mandatory retirement and was fully engaged to complete that service. Mr. Sproule did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He has experienced extended delays for his release to be processed to make him eligible for retraining and education funding. He is experiencing financial hardship which is affecting his mental health. Mr. Sproule has not received any final returns on his grievances.

98. The Plaintiff, Shane Michael N. Singer, was a member of the CAF and holds the rank of Corporal. He was an Aviation Systems Technician posted at 14 Air Maintenance Squadron at CFB Greenwood. He lives in Kingston, Nova Scotia. He served honourably for over 15 years. Cpl. Singer received two COVID-19 injections because as a single father he could not afford to lose his career. Within a few months of the injections, Cpl. Singer was diagnosed with a nodule on his thyroid that was impeding his ability to swallow. The nodule and half of his thyroid were surgically removed. He chose to release under a 3(b) medical release to avoid being posted to where he would be required to have booster injections.
99. The Plaintiff, Jaroslaw Grzegorz Marczewski, is a member of the CAF and holds the rank of Sergeant. He is an Infanteer posted at the Argyll and Sutherland Highlanders of Canada. He lives in Brampton, Ontario. He has served honourably for over 24 years. Sgt. Marczewski did not receive any COVID-19 injections. He was told by his CoC that no level of command would assume liability for any vaccine injuries suffered by CAF members. He applied for a *CHRA* accommodation and was denied verbally and not in writing by his CO. He was told that grievances could not begin to be processed for 18 months rather than the 3 months per policy. He withdrew one grievance after being threatened with losing his pension; this was resubmitted as a harassment complaint. As the only soldier not to voluntarily release under the Directives, Sgt. Marczewski was the subject of derogatory and abusive treatment by his CoC for filing grievances. He has not received any final returns on his grievances.

100. The Plaintiff, Christopher Nightingale Anderson, is a member of the CAF and holds the rank of Lieutenant. He is an Electrical and Mechanical Engineering Officer posted to CFB Trenton. He lives in Trenton, Ontario. He has served honourably for over 20 years. Lt. Anderson received two NOVAVAX COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied as being more of a medical request than a spiritual one. He was not given the opportunity to clarify his beliefs and only had one meeting with a Padre to share his position.
101. The Plaintiff, Francis Joseph Michel Archambault, is a member of the CAF and holds the rank of Warrant Officer. He is an Infantryman with 37 Command Brigade Group in Northern New Brunswick. He lives in Allardville, New Brunswick. He has served honourably for over 18 years. WO Archambault did not receive any COVID-19 injections. Without notice to him, he was posted to another Base which had a significant impact on him and his family. At the time, he was on PATA and would have to move during this leave. He only became aware of the posting when contacted by a MWO from the new Base. He had prepared a request for a religious accommodation to submit upon his return from PATA.
102. The Plaintiff, Christopher Raymond Austin, is a member of the CAF and holds the rank of Corporal. He is a Military Police Officer posted at CFB Edmonton. He lives in Spruce Grove, Alberta. He has served honourably for over 23 years. Cpl. Austin did not receive any COVID-19 injections. He was placed on LWOP for almost one year for not being vaccinated soon after the Directives were implemented by the CoC. He applied for a religious accommodation and was denied without any consultation with a Padre. The CoC used information from the leader of his faith to determine Cpl. Austin's sincerity and religious belief. He then applied for a *CHRA* accommodation which was denied. He was not recorded as on LWOP in the pay system and this has had implications for his pension.
103. The Plaintiff, John Anthony Baklinski, is a member of the CAF and holds the rank of Corporal. He is a Military Police Officer posted at Ottawa. He lives in

Ottawa, Ontario. He has served honourably for over 3 years. Cpl. Baklinski did not receive any COVID-19 injections and has established natural immunity from infection. His CoC sent military police to his door to confirm he was sick when he was confirmed to have COVID-19 to check he was following the protocol in the Directives. They also gave him a RW for having more than one page to explain his religious beliefs. He applied for a religious accommodation and was denied. The CoC used information from the leader of his faith to determine Cpl. Baklinski's sincerity and religious belief. Conditions in the workplace became so bad that, at one point, he contemplated suicide. Upon his return to work after PATA, he was then subjected to a revival of RM which had already been dealt with up to two years previously. The wording had also been changed to make the events worse than they were and with false allegations. There were events within the RM which he was unaware had happened. His fellow members told him he was being targeted for not complying with the Directives. Cpl. Baklinski has now been placed on stress leave.

104. The Plaintiff, David Glen Barkhouse, was a member of the CAF and held the rank of Master Corporal. He was an electrical Distribution Technician posted at CFB Halifax. He lives in Williamswood, Nova Scotia. He served honourably for over 19 years. He applied for a religious accommodation, which was supported by the Chaplain, and was denied by his CoC. Mr. Barkhouse received the Johnson & Johnson COVID-19 injection to avoid the financial hardship and future career limitations of a 5(f) release. He sees this as a moral failure on his part. He released under a 4(c) to take a position with the Public Service due to a lack of trust in the CoC.

105. The Plaintiff, Michael Barrette, was a member of the CAF and held the rank of Corporal. He was a Materials Technician with 1 Service Battalion posted to CFB Edmonton until 10 August 2022 with a 5(f) release category. He lives in St. Albert, Alberta. He has served honourably for over 9 years. Mr. Barrette did not receive any COVID-19 injections. He noted that a waiver was required to be signed by those receiving the injections which had never been required for any previous vaccinations. He approached a Padre to discuss a religious exemption

and was told no religious exemptions were being granted. He then applied for a *CHRA* accommodation and was denied.

106. The Plaintiff, Darrin Thomas Beaton, was a member of the CAF and holds the rank of Master Corporal. He is an Aerospace Telecommunications and Information Systems Technician with 14 Wing Greenwood posted to CFB Greenwood until 24 February 2023 under a 4(c) release category. He lives in Nictaux West, Nova Scotia. He served honourably for over 10 years. He made attempts to receive the Johnson & Johnson COVID-19 vaccine, including trying to travel to the United States, but was unsuccessful. Mr. Beaton did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied. Mr. Beaton was harassed in his home and questioned by police at the request of his CoC. He also had threats of being charged with a service offence. Mr. Beaton has not received any final returns on his grievances.

107. The Plaintiff, Bobak Beheshti, is a member of the CAF and holds the rank of Captain. He is a Pilot with 403 Squadron posted to CFB Gaagetown as an instructor at the CH146 Griffon Helicopter Operational Training Unit. He lives in Fredericton, New Brunswick. He has served honourably for over 16 years. Capt. Beheshti received one dose of Moderna COVID-19 injections and suffered confirmed myocarditis one day later. He was ordered by the Base Surgeon to have a second dose while still under medical investigation from the first dose. He applied for a medical accommodation and was denied. Capt. Beheshti submitted a Hazard Report in the Flight Safety database citing the health risks of COVID-19 injections after witnessing several CAF members suffering adverse events after injection. He was sent home and told not to return to the Base unless authorized. Capt. Beheshti's ability to have a flying career is in jeopardy.

108. The Plaintiff, Andres Felipe Bocanegra Beltran, was a member of the CAF and holds the rank of Sailor 1. He was a Material Management Technician posted at CFB Esquimalt released under the 5(f) category. He lives in Victoria, British Columbia. He has served honourably for over 9 years. Mr. Beltran did not



receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied one day after submitting it.

109. The Plaintiff, Nathan Kyle Johnson, is a member of the CAF and holds the rank of Corporal. He is an Infanteer with 1 Battalion PPCLI posted at CFB Edmonton. He lives in ~~Sherwood Park Camrose~~, Alberta. He has served honourably for over 5 years. Cpl. Johnson did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied by the Review Board headed by Brig. General (then Colonel) LW Rutland. He was derided within his CoC including emails calling him “Anti Vaxx Johnson” among the Battalion Clerks. He is currently on PATA.
110. The Plaintiff, Conrad Joseph Benoit, is a member of the CAF and holds the rank of Petty Officer Second Class. He is a Signal Intelligence Specialist posted at CFB Kingston. He lives in Kingston, Ontario. He has served honourably for over 15 years. After being disheartened that his career would end in a dishonourable release, PO2 Benoit had the NOVAVAX COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He was not allowed onto the Base nor at any social functions. He could not do any training due to the security level required for his trade and this has impacted his career.
111. The Plaintiff, Mathieu Bernard, was a member of the CAF and holds the rank of Corporal. He was an Electrical Distribution Technician with 19 Wing Comox posted to CFB Comox until 20 April 2022 only 19 days from when he requested the release as he was slated for a 5(f) release later that year. He lives in Comox, British Columbia. He has served honourably for over 4 years. Mr. Bernard did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He has experienced extreme and constant threats from his CoC. Mr. Bernard had his grievances refused by his CoC so were not eligible for review by the Initiating Authority (“IA”) or by the Final Authority (“FA”).

112. The Plaintiff, Brian James Bews, is a member of the CAF and holds the rank of Major. He is a Pilot posted to the Fighter Capability Office in Ottawa under a remote work agreement. Part of his role allows him to see staffing for trades and experience in the CAF. He lives in Vernon, British Columbia. He has served honourably for over 23 years. Major Bews did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He also advised his CO that the Directives violated the *Charter* and was told the legal team had rejected that submission.
113. The Plaintiff, Michael Christopher Bill, was a member of the CAF and holds the rank of Master Corporal. He is a Mobile Support Equipment Operator posted to CFB Comox until he was released under the 3(b) medical category on 30 June 2022. He had already received a release package for a 5(f) when it was changed to a 3(b) release. He lives in Lazo, British Columbia. He has served honourably for over 14 years. Mr. Bill did not receive any COVID-19 injections. He applied for a medical and *CHRA* accommodation and was denied both. When he informed his CoC that he would comply and be vaccinated, he was told RM would continue regardless of his vaccination status. He asked for time to get results from a scheduled cardiac MRI and asked for a consultation with a specialist but was denied both requests.
114. The Plaintiff, Robert Stewart Bishop, was a member of the CAF and holds the rank of Corporal. He is an Infantryman with the 4PPCLI Loyal Edmonton Regiment posted to CFB Edmonton until 26 April 2022 under a 4(c) category. He lives in St. Albert, Alberta. He has served honourably for over 5 years. Mr. Bishop did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was asked multiple times to disclose personal medical information by informal means such as distributed lists. Mr. Bishop's request for a voluntary release was met with no communication from his CoC. He had requested on 17 May 2022 that his release date be 15 June 2022; but his Record of Employment shows his release date as 26 April 2022.
115. The Plaintiff, Jefferson Malcome Bissengue, was a member of the CAF and held the rank of Master Corporal. He is a Material Management Technician

with 1 Service Battalion posted to CFB Edmonton until 10 August 2022 when he was released under the 5(f) category. He lives in Edmonton, Alberta. He has served honourably for over 9 years. Mr. Bissengue did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He submitted a memo on 11 July asking for a 90-day extension on his release to his CoC. On 25 July 2022, he was in a meeting with his CoC and saw a 30-day extension in writing. On 9 August 2022 he received a message from the CoC that his request for 90-day extension was submitted to DMCA that day. He then received a phone call on 10 August 2022 from the Release Centre asking why he was not there to complete his release paperwork. He was told his extension had been denied by DMCA on the same day the extension request was allegedly sent in.

116. The Plaintiff, Steven Bolduc, is a member of the CAF and holds the rank of Corporal. He is an Aircraft Structure Technician with 438 Squadron posted to CFB Montreal. He lives in Saint-Hubert, Quebec. He has served honourably for over 18 years. Cpl. Bolduc received one dose of the COVID-19 injections and was severely harassed to receive the second which he did to preserve his career and housing on Base for his family. He is receiving treatment for his mental health. He applied for a *CHRA* accommodation and was denied.

117. The Plaintiff, Thomas Gill Bonnett, is a member of the CAF and holds the rank of Captain. He is an Infantry Officer with the Queens Own Cameron Highlanders posted at the Minto Armoury in Winnipeg. He lives in Winnipeg, Manitoba. He has served honourably for over 6 years. Capt. Bonnett did not receive any COVID-19 injections. He received RM and suffered an impact on his career due to being denied training he required to advance. He did not apply for a religious accommodation as he was told by his CoC that few would be granted and his would not be approved. He was praised by his CO for taking it like a man by not asking for an accommodation based on his faith. He was a Platoon Commander for establishing vaccine clinics in Northern Manitoba communities. Four of his family member shave had adverse reactions to the injections that were heart-related which matches with the known family history of heart conditions but no previous heart issues. He was reluctant to ask for a medical

exemption given the reaction of his CoC to his previous enquiries about a religious accommodation request. Capt. Bonnett has not received any final returns on his grievances.

118. The Plaintiff, Charles Anthony Valmhor Borg, was a member of the CAF and holds the rank of Lieutenant (Navy). He is an Intelligence Officer posted to HMCS MALAHAT until 29 July 2022 with a 5(f) category. He lives in Victoria, British Columbia. He has served honourably for over 10 years. He did not receive any COVID-19 injections. He applied for a *CHRA* accommodation to continue with the remote work he was already doing at the time of the Directives and was denied. Mr. Borg had submitted his request to his CO, but the denial came from Vice Admiral (then Rear Admiral) Al Topshee. Mr. Borg has not received any final returns on his grievances.
119. The Plaintiff, Patrick James Boschalk, is a member of the CAF and holds the rank of Corporal. He is a Signal Technician posted to CFB Gander. He lives in Gander, Newfoundland. He has served honourably for over 6 years. Cpl. Boschalk did not receive any COVID-19 injections. He applied for a religious accommodation and was denied even though two Padres had determined the belief is religious in nature and sincerely held. Cpl. Boschalk has not received any final returns on his grievances.
120. The Plaintiff, Karla Rae Bowler, was a member of the CAF and held the rank of Corporal. She is a Dental Technician with 8 Wing Trenton posted to CFB Trenton until 7 June 2022 under a 5(f) category for failing to follow a lawful order but was never charged with a service offence. She lives in Trenton, Ontario. She has served honourably for over 3 years. Ms. Bowler did not receive any COVID-19 injections. She applied for a *CHRA* accommodation and was denied.
121. The Plaintiff, Kenneth Scott Bradley, was a member of the CAF and held the rank of Corporal. He was an Aircraft Structures Technician with 436 Squadron posted to CFB Trenton until 25 July 2022 when he was released under the 5(f) category. He was in the process of a medical release for injuries sustained while in service. He lives in Trenton, Ontario. He has served honourably for over 24 years. Mr. Bradley did not receive any COVID-19

injections and has established natural immunity from infection. His deficiencies cited in his RM were not applicable to him and had to be rewritten. Despite his request to not be contacted while on approved leave, he was continually called and emailed to attend meetings or answer non-urgent questions. Mr. Bradley has not received any final returns on some of his grievances.

122. The Plaintiff, Dwayne Armand Bratzke, was a member of the CAF and holds the rank of Master Corporal. He was a Mobile Support Equipment Operator at 1 Service Battalion posted to CFB Edmonton until 21 March 2022 when he released under a 4(c) voluntary category to avoid a 5(f) release. He lives in Edmonton, Alberta. He has served honourably for over 17 years. Mr. Bratzke did not receive any COVID-19 injections even though he attended to the medical unit twice for the injections. They refused to give it to him as they determined he was not giving consent voluntarily as he conveyed to the medical staff that he had been told he would need the injections to have a 4(c) release. He applied for a *CHRA* accommodation and was denied.

123. The Plaintiff, Ryan Douglas Breau, was a member of the CAF and held the rank of Sergeant. He was a Supply Technician posted to CFB Greenwood until 25 May 2022 on a 5(f) release with 23 days' notice of the release date. He lives in Greenwood, Nova Scotia. He has served honourably for over 17 years. Mr. Breau did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied.

124. The Plaintiff, Chara Loren Browne, was a member of the CAF and held the rank of Master Corporal. She was a Human Resources Administrator at 37 Combat Engineer Regiment posted to CFB Gagetown until 28 July 2022 under a 5(f) release. She lives in New Maryland, New Brunswick. She served honourably for over 14 years. Ms. Browne did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a religious accommodation and was denied due to her church being non-denominational. Her husband, also a member of the CAF, had his religious accommodation approved by his CO. He attends the same church as Ms. Browne. While she was working from home, she was asked at the beginning of very video meeting if she

had changed her mind about receiving the injections. She was laughed at for suggesting working in the office after hours or isolated from other members. She had the same response to doing physical training. Ms. Browne has not received any final returns on her grievances.

125. The Plaintiff, William Frederick Bull, was a member of the CAF and held the rank of Petty Officer Second Class. He was a Sonar Operator posted to HMCS CORNER BROOK until 28 February 2022 when he retired from service. He lives in Victoria, British Columbia. He has served honourably for over 19 years. Mr. Bull received one COVID-19 injection under duress but did not receive a second dose because he could not get an answer on how long he had to wait between doses. He had a return of mental health issues due to the stress of the Directives and the conflicting information.
126. The Plaintiff, Mark A. Calow, is a member of the CAF and held the rank of Sergeant. He is an Infanteer with the North Saskatchewan Regiment posted to Saskatoon. He lives in Saskatoon, Saskatchewan. He has served honourably for over 19 years. He was told that he would not receive his pension if released under a 5(f) category. He requested to release under a 4(c) category to also keep his options for federal government employment. He was denied this release as it was seen as him trying to avoid disciplinary actions. His CoC admitted to using a template for paperwork which had information which did not apply to Mr. Calow. He had no communication with his CoC until after Directive 003 and he was contacted to return to work. When he asked for leave a few weeks later, he was told he had none to take as his annual leave days had been used without his knowledge while he was ordered to stay at home. The CoC tried to get him to sign a backdated leave pass to cover for this action. He was then denied Christmas leave that was granted to all other full-time staff and was told to use his annual leave instead. Sgt. Calow did not receive any COVID-19 injections. He was told there were no accommodations to be granted.
127. The Plaintiff, James Gregory Cameron, is a member of the CAF and holds the rank of Corporal. He is an Aviation Systems Technician posted to CFB Trenton. He lives in Borden, Ontario. He has served honourably for over 13

years. Cpl Cameron received two COVID-19 injections. He was told that his career transfer would not go through, and too think about his family, indicating that he would not be able to support them if he did not comply.

128. The Plaintiff, Brett Grant Gordon Campbell, was a member of the CAF and holds the rank of Corporal. He is an Infanteer with the 1<sup>st</sup> Royal Canadian Regiment until 22 March 2022 when he released under a category of 4(b)—Completion of Fixed Term of Service. He did not renew his service due to the Directives. He lives in Pembroke, Ontario. He has served honourably for over 6 years. Mr. Campbell did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied.

129. The Plaintiff, Damian Ronald Cayer, was a member of the CAF and held the rank of Petty Officer Second Class. He was a Hull Technician posted at CFB Esquimalt until 1 February 2022 when he released under the 3(b) medical category. His CoC suggested that he could have his medical release cancelled and replaced with a dishonourable release if he did not comply with the Directives. He lives in Victoria, British Columbia. He has served honourably for over 27 years. Mr. Cayer did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. The CoC was so disruptive to his schedule that his vocational rehabilitation employer cancelled his work three months early. Mr. Cayer has since been diagnosed by the Occupational Stress Injury Clinic related, in part, to his undignified release.

130. The Plaintiff, Jesse Shayne Chambers, was a member of the CAF and held the rank of Officer Cadet. He was training to be a Communications Electronics Engineering Officer. He was posted at the Royal Military College at Kingston. He lives in Kingston, Ontario. He served honourably for over 4 years. Mr. Chambers did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He is unable to obtain his transcripts for transfer credits to another university. He spent a month in isolation and was required to walk over 30 minutes each way for meals. He was told that he could get ~~that~~ the injections and no one needed to know.

131. The Plaintiff, Vladimir Charnine, is a member of the CAF and holds the rank of Master Sailor. He is a Material Management Technician posted to HMCS DISCOVERY. He lives in Vancouver, British Columbia. He has served honourably for over 17 years. MS Charnine did not receive any COVID-19 injections. He has noted that unvaccinated CAF members could not enter the military establishment while unvaccinated civilians and veterans were allowed to enter. He applied for a religious accommodation and was denied. MS Charnine has not received any final returns on his grievances.
132. The Plaintiff, Shaun Kyle Charpentier, was a member of the CAF and holds the rank of Petty Officer Second Class. He is a Naval Communicator posted to the Transition Centre for vocational Rehabilitation for service-related injuries pending a 3(b) medical release. He lives in Esquimalt, British Columbia. He has served honourably for over 13 years with an original medical release date of 21 March 2022. Mr. Charpentier did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a medical accommodation and was denied. He was threatened that his 3(b) release would be rescinded and replaced by a 5(f) which would deny him significant supports and benefits for his injuries.
133. The Plaintiff, Daniel Robert Cheshire, was a member of the CAF and held the rank of Petty Officer Second Class. He was Chief of Operations posted to HMCS HUNTER until 5 May 2023 when he released under a 4(c) voluntary release. He lives in Windsor-Essex County, Ontario. He served honourably for over 13 years. Mr. Cheshire did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was isolated and ostracised from his fellow members both for training and social events. He was told that a 5(f) was a dishonourable discharge. His DND/CAF issued laptop was taken away so he could not perform his duties.
134. The Plaintiff, Dave Cimon, is a member of the CAF and holds the rank of Petty Officer Second Class. He is a Marine Technician posted to HMCS DONNACONA but was suspended under the Directives. He lives in St-Jerome, Quebec. He has served honourably for over 20 years. Mr. Cimon did not receive



any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. Mr. Cimon has not received any final returns on his grievances.

135. The Plaintiff, Charles Benoit-Jean Cote, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted to First Reserves until 5 May 2022 when he was released under the 5(f) category. He lives in St-Anaclet-de-Lessard, Quebec. He has served honourably for over 13 years. Mr. Cote did not receive any COVID-19 injections.
136. The Plaintiff, Remi Cote, was a member of the CAF and held the rank of Master Corporal. He is an Infanteer posted with Voltigeurs de Quebec in Quebec. He lives in Quebec City, Quebec. He has served honourably for over 9 years. Mr. Cote did not receive any COVID-19 injections. He has experience in an analytical laboratory and early clinical studies to develop mRNA vaccines. He applied for a *CHRA* accommodation as a medical accommodation could not be prepared within the set timelines of the Directives. His request was denied.
137. The Plaintiff, Mathieu Coulombe, is a member of the CAF and holds the rank of Private. He is an Infanteer posted at 6<sup>th</sup> Battalion of the Royal 22<sup>nd</sup> Regiment. He lives in Yamaska, Quebec. He has served honourably for over 2 years. Pvt. Coulombe did not receive any COVID-19 injections. He applied for an accommodation and did not receive a response. He applied for a voluntary release and received no response. He has been anticipating a release for over a year with no release date given. After nearly a year with no contact, he was contacted by his CoC via FaceBook for an update.
138. The Plaintiff, Rebekah Kathleen Courtney, was a member of the CAF and held the rank of Aviator. She was a Mobile Support Equipment Operator posted to CFB Greenwood until 23 June 2022 when she was released with a 5(f) category. She lives in Greenwood, Nova Scotia. She served honourably for over 2 years. Ms. Courtney did not receive any COVID-19 injections. She applied for a *CHRA* accommodation and was denied.
139. The Plaintiff, Maverick Jeremy Joseph Cowx, is a member of the CAF and holds the rank of Warrant Officer. He is an Infanteer posted at 5 Canadian Division Training Centre where he holds the role of instructor. He lives in

Oromocto, New Brunswick. He has served honourably for over 15 years. He witnessed insufficient disease control methods used when the military team arrived back from the World Military Games in Wuhan, China. WO Cowx did not receive any COVID-19 injections. He was expecting a 5(f) release but was retained when the RM process was not completed before Directive 003 was issued.

140. The Plaintiff, Jonathan Wayne Crouch, was a member of the CAF and held the rank of Master Corporal. He was an Intelligence Operator until 11 January 2022 when he was released under a 3(b) medical release for Post-Traumatic Stress Disorder made worse by the Directives. He lives in St-Cecile de Masham, Quebec. He has served honourably for over 13 years. Mr. Crouch did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and did not receive a decision before his release.
141. The Plaintiff, Nicole Johnna Crowder, is a member of the CAF and holds the rank of Master Corporal. She is a Material Management Technician posted at Canadian Special Forces Command (“CANSOFCOM”) in Ottawa. She lives in Ottawa, Ontario. She has served honourably for over 14 years. She suffers from service-related injuries that would make her eligible for a 3(b) medical release instead of a 5(f) category. She did not receive any COVID-19 injections. She applied for a religious accommodation and was denied. Ms. Crowder has not received any final returns on her grievances.
142. The Plaintiff, Bartlomiej David Cychner, is a member of the CAF and holds the rank of Corporal. He is a Mobile Support Equipment Operator posted to 31 Service Battalion Hamilton. He lives in Ottawa, Ontario. He has served honourably for over 26 years. Cpl. Cychner receive the NOVAVAX COVID-19 injection under duress during RM for a 5(f) release and his transfer to the Supplemental Reserve was denied. He applied for a *CHRA* accommodation and was denied.
143. The Plaintiff, Beata Margaret Czapla, was a member of the CAF and held the rank of Corporal. She was a Medical Technician with 1 Field Ambulance

Detachment Suffield until 12 July 2022 under a 5(f) category despite no decision being received on a medical release and extensions being granted under a temporary medical accommodation. She lives in Medicine Hat, Alberta. She has served honourably for over 9 years. She has served on the front line of COVID-19 health care. She witnessed breaches of medical privacy and coercion to receive the injections. She was also ostracized and mocked by her peers. Ms. Czapla did not receive any COVID-19 injections. She applied for a *CHRA* accommodation after having to advocate for the proper format and assistance on the document. She was given 48 hours to complete the paperwork with no access to the information she needed. She was told that a 5(f) release would mean the loss of veteran benefits. She has struggled as a single mother after her release. Ms. Czapla has not received any final returns on her grievances.

144. The Plaintiff, Sara Darby, was a member of the CAF and holds the rank of Sergeant. She is a Material Management Technician posted at CANSOFCOM in Ottawa until 30 May 2022 when she was released under category 5(f). The decision made by DMCA one day after her representations were made to them. She lives in Ottawa, Ontario. She has served honourably for over 14 years. Ms. Darby did not receive any COVID-19 injections. She heard of vaccine injuries among CAF members. She applied for a religious accommodation and was denied. Despite no change in her work performance, she has now received less than satisfactory evaluations questioning her loyalty to the CAF. She was denied access to mental health supports within the CAF. Ms. Darby has not received any final returns on her grievances.

145. The Plaintiff, Brady Damien Dedam, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted at CFB Greenwood until 10 June 2022 under the 4(c) release category to avoid a 5(f) category. He lives in Lagaceville, New Brunswick. He has served honourably for over 5 years. Cpl. Dedam did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and never received a decision. He has faced significant financial struggles since his release.

146. The Plaintiff, Virgil Severin Dessouroux, is a member of the CAF and holds the rank of Captain. He is an Armour Officer posted to Canadian Forces Recruitment Centre Fredericton. He lives in Oromocto, New Brunswick. He has served honourably for over 14 years. Capt. Dessouroux received the Johnson & Johnson COVID-19 injection under duress to keep his employment after being denied LWOP. He had adverse effects within 48 hours of receiving the injection. He contracted COVID-19 approximately 6 months after his injection. He applied for a *CHRA* accommodation and was denied.
147. The Plaintiff, Sean Robert Dixon, is a member of the CAF and holds the rank of Corporal. He is a Geomatics Technician posted to Mapping and Charting Establishment Ottawa. He lives in Ottawa, Ontario. He has served honourably for over 25 years. Cpl. Dixon did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He was later granted this accommodation long after the recommendation for a 5(f) release after successfully grieving at the IA level. He was supported in a medical release for service-related injuries but this was denied by DMCA.
148. The Plaintiff, Robert Adam Doliwa, was a member of the CAF and holds the rank of Corporal. He was an Avionics Systems Technician posted to 442 Squadron until 29 April 2022 under a 5(f) release category. He lives in Comox, British Columbia. He served honourably for over 11 years. Mr. Doliwa did not receive any COVID-19 injections. He applied three times for a *CHRA* accommodation and was denied.
149. The Plaintiff, Daniel Pierre Drolet, was a member of the CAF and held the rank of Corporal. He was a Vehicle Technician with 3 Wing Bagotville until 20 June 2022. He was told at his release appointment that he could return if he was vaccinated. Mr. Drolet was released under a 5(f) category and the recommended release date was 2 August 2022 which his CoC shortened. He lives in Shipshaw, Quebec. He has served honourably for over 16 years. Mr. Drolet did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was granted one. He also applied for

a *CHRA* accommodation which was denied. Harassment came from colleagues who were aware of his status including searching through his personal items then putting them in a box, including pictures of his children, with grease-stained rags. The line card which gave him access to the runway was stolen and he had to justify this loss to the MPs. His RM were accelerated with often 3 days between rather 7 days per the Directives or 3 months per policy. He was denied a release medical in person for Phase 1 and Phase 2 was done over the phone. He has struggled to have employment since his release. His pension value loss during the implementation of the Directives lost almost 75% of its value.

150. The Plaintiff, Samuel Drouin, is a member of the CAF and holds the rank of Captain. He is a Chaplain posted to 3rd Canadian Division Support Group at CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 4 years. He was on PATA when the Directives were issued, and despite members on leave were to be left alone, was harassed multiple times by the CoC, including uniformed officers coming to his home. Upon his return from PATA, there were challenges to the process of RM and accommodation that included a posting to CFB Valcartier that was then cancelled. Padre Drouin was transferred out of his unit, 1 Service Battalion. He is now being posted to CFB Comox. Padre Drouin did not receive any COVID-19 injections. He applied for a religious accommodation and did not receive a decision.

151. The Plaintiff, Benjamin Graham Dunbar, was a member of the CAF and holds the rank of Corporal. He is a Vehicle Technician posted to CFB Wainwright until 14 June 2022 under a 5(f) release. He lives in Airdrie, Alberta. He has served honourably for over 6 years. Mr. Dunbar did not receive any COVID-19 injections. He did not apply for an accommodation because he had seen so many other members had failed. He was put under investigation for asking questions and most of his CoC would not speak to him. He was acquitted upon review of a Summary Trial verdict when the evidence relied upon was an involuntary statement coerced by CWO Descheneaux. His Master Corporal was threatened with a 5(b) release if Cpl. Dunbar spoke out again.

152. The Plaintiff, Matthew Alexander J. Durda, was a member of the CAF and held the rank of Corporal. He was an Infanteer with Combat Support Company Recce Platoon posted to CFB Edmonton until 18 August 2022 as a 4(c) release category. He lives in Edmonton, Alberta. He has served honourably for over 6 years. Mr. Durda received one COVID-19 injection and did not take a second one. He felt shame that he took one dose when Directive 003 came out soon after his release. He applied for a religious accommodation and was denied. The Brigade Commander, Brig General (then Colonel) LW Rutland, and not Mr. Durda's CO, stated in the decision that taking the vaccine would not cause harm to Mr. Durda's relationship with the Holy Spirit. Rutland also stated that no coercion was applied to take a vaccine despite the decision leading to forced release.

153. The Plaintiff, Stephen Andrew Terence Ells, was a member of the CAF and held the rank of Corporal. He was a Line Technician posted to CFB Petawawa until 7 June 2022. He lives in Petawawa, Ontario. He has served honourably for over 10 years. Mr. Ells did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He applied for a religious accommodation and was denied. Mr. Ells has not received any final returns on his grievances. Mr. Ells is struggling with the lack of health benefits for his family as well as finding enough income to support his family after his release.

154. The Plaintiff, Austin Karn Faulkner, is a member of the CAF and holds the rank of Captain. He is a Pilot with 408 Squadron at CFB Edmonton. He lives in **Onoway, Alberta**. He has served honourably for **almost 6** years. Capt. Faulkner received his first dose in the back alley of the 17 Wing Medical Inspection Room (MIR) because he was not allowed inside the military hospital as an unvaccinated person. He received his second dose in the same environment and circumstances one month later in winter conditions. He took the injections under duress and to save his career. When he submitted a request for a *CHRA* accommodation, he was met with threats to remove him from all training and end his military career and the request was never considered. Capt. Faulkner

describes the experience as being physically violated by his CoC against his deeply held religious beliefs.

155. The Plaintiff, Eric Michael C.S. Fontaine, was a member of the CAF and held the rank of Warrant Officer. He was an Air Drop Systems Technician posted to the Canadian Army Advanced Warfare Centre until 10 July 2022. He lives in Sainte-Croix, Quebec. He has served honourably for over 25 years. WO Fontaine received two doses of Moderna COVID-19 injections in less than one month. He suffered a cardiac event within a few days of the second dose. He refused a booster injection out of fear for his health. This impacted his career immediately. He chose to retire from service rather than deal with the demand for booster injections. He was referred for a cardiac workup with a specialist following his release medical appointment. He has heard senior supervisors openly discussing members and their vaccination statuses with no regard for privacy following their attestations.
156. The Plaintiff, William Joseph R. Forget, is a member of the CAF and holds the rank of Private. He is a Mobile Support Equipment Operator posted at CFB Valcartier. He lives in Montreal, Quebec. He has served honourably for over 1 year. Pvt. Forget did not receive any COVID-19 injections and has established natural immunity from infection. Cpl. Forget has never had any vaccinations and successfully enrolled in the CAF. He applied for a religious accommodation and was denied. When he returned to duty, he was assigned to work in close contact with members in isolation for COVID-19 at CFB Borden. Communications for this tasking was in WhatsApp which is not approved for CAF communications. Pvt. Forget has been offered a 6-year contract when his current Terms of Service expire in 2024.
157. The Plaintiff, Sean Michael Francis, is a member of the CAF and holds the rank of Master Corporal. He is an Artilleryman and Infanteer posted at Peterborough/Hastings and the Prince Edward Regiment. He was removed as a Section Commander and tasked to Administration causing him embarrassment among his troops. He lives in Peterborough, Ontario. He has served honourably for over 24 years. MCpl. Francis did not receive any COVID-19 injections. He

applied for a *CHRA* accommodation and religious accommodation, and both were denied. When he accessed the information on who had looked at his record in Monitor Mass, there were at least two people who should not have accessed the record but did. His history with the CAF became common knowledge with his Regiment through the actions of Major Schotsch in his CoC causing embarrassment and gossip with his peers. MCpl. Francis' mental health has rapidly declined since the Directives were implemented to the point of suicidal ideation. He has not received any final returns on his grievances.

158. The Plaintiff, Kory Michael Fraser, is a member of the CAF and holds the rank of Master Corporal. He is a Material Management Technician posted to 7 Canadian Forces Supply Depot at CFB Edmonton. He lives in Morinville, Alberta. He has served honourably for over 7 years. MCpl. Fraser received one dose of Johnson & Johnson COVID-19 injection to preserve his income for his young family. He suffers from mental health issues since he had the injection. He applied for a religious accommodation and was denied. Mr. Fraser has not received any final returns on his grievances.

159. The Plaintiff, Jason Joseph Kevin Frechette, was a member of the CAF and held the rank of Master Sailor. He is a Naval Combat Information Operator posted at HMCS VICTORIA until released under a 5(f) category. He lives in Victoria, British Columbia. He has served honourably for over 11 years. Mr. Frechette did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. In his release disclosure from DMCA, he was cited for a 5(f) release because he developed a personal weakness or has domestic or other personal problems that impair his usefulness to and imposes an excessive administrative burden on the CAF, none of which applies to a religious objection to a vaccination nor was shown by evidence before the decision-maker, Colonel JK Judiesch.

160. The Plaintiff, Christopher Benjamin Fuellert, was a member of the CAF and held the rank of Corporal. He was an Electrical Distribution Technician posted to 3 Canadian Division Support Base at CFB Edmonton until he was released under category 5(f) on 4 May 2022. He lives in Legal, Alberta. He



served honourably for over 7 years. Mr. Fuellert did not receive any COVID-19 injections and has established natural immunity from infection. He had not taken flu vaccines in the past while in the CAF with no actions taken by his CoC. He was on medication which did not have any information available for contraindications with the COVID-19 injections. He applied for a medical accommodation and was denied. Cpl. Fuellert was told he would be released in 3 weeks if he did not accept the injections. His PATA was denied and his posting to Cold Lake was cancelled.

161. The Plaintiff, Steven James Gallant, is a member of the CAF and holds the rank of Sergeant. He is a Musician posted to the Central Band of the CAF. He lives in Ottawa, Ontario. He has served honourably for over 10 years. He was of the belief that he could lose his pension if he did not voluntarily release. Sgt. Gallant did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. Sgt. Gallant was admitted to a mental health facility to receive in-patient care due to the unfair and horrendous treatment he received during the implementation of the Directives.

162. The Plaintiff, Steven Roy Gamble, is a member of the CAF and holds the rank of Corporal. He is a Medical Technician posted to CFB Esquimalt. He lives in Victoria, British Columbia. He has served honourably for over 5 years. Cpl. Gamble did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He then applied for a religious accommodation and was denied because his spiritual beliefs did not fall under the 25 religions recognized by the CAF. He received notice that he was to be released under a 5(f) category over a year ago but has had no communications from his CoC regarding a release date or return to work.

163. The Plaintiff, Tanya Lee Gaudet, was a member of the CAF and held the rank of Petty Officer Second Class. She was a Human Resources Administrator posted to Fleet Maintenance Facility Cape Scott until 6 May 2022 when she received a 3(b) release. She lives in Williamswood, Nova Scotia. She has served honourably for over 22 years. Ms. Gaudet did not receive any COVID-19 injections. She applied for a medical accommodation due to a heart condition

and was denied. She asked to have the Johnson & Johnson injection but was told this would not satisfy the Directives by her CoC. The release package to DMCA by CPO1 Burns contained gossip and falsehoods about her that included information that could have resulted in a 3(b) medical release.

164. The Plaintiff, Emilie Gauthier-Wong, was a member of the CAF and held the rank of Sergeant. She was an Infanteer posted to Voltigeurs de Quebec, 35th Brigade, 2nd Division until she was released on 28 February 2022 under a voluntary release 4(c) category. She lives in Quebec City, Quebec. She has served honourably for over 10 years. Ms. Gauthier-Wong did not receive any COVID-19 injections. She deployed on COVID-19 operations in 2020. She applied for a *CHRA* accommodation and was denied.

165. The Plaintiff, Tommy Gauvreau, was a member of the CAF and held the rank of Sergeant. He was an Intelligence Operator posted to CFB Valcartier until 27 May 2022 under a 5(f) release category. He lives in Quebec City, Quebec. He has served honourably for over 21 years. Mr. Gauvreau did not receive any COVID-19 injections. He has not received any final returns on his grievances.

166. The Plaintiff, Nicholas Alexander Gleis, is a member of the CAF and holds the rank of Corporal. He is an MP with 1 Military Police Regiment posted to CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 4 years. Cpl. Gleis did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. Cpl. Gleis has not received any final returns on his grievances.

167. The Plaintiff, Marcel Joseph G.E. ~~Gobiel~~Gobeil, was a member of the CAF and held the rank of Corporal. He was a Mobile Support Equipment Operator posted 430 Tactical Helicopter Squadron until 8 July 2022 when he was release under the 5(f) category. He lives in Valcartier, Quebec. He has served honourably for over 9 years. Mr. ~~Gobiel~~Gobeil did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied.

168. The Plaintiff, Tammy Danielle Greening, was a member of the CAF and held the rank of Sergeant. She is a Human Resources Administrator posted at

CFB Kingston/1Wing Headquarters until 29 December 2021. She lives in Kingston, Ontario. She has served honourably for over 19 years and had been scheduled for a 3(b) medical release that would take her to 20 years of service to receive benefits such as vocational rehabilitation. She had to request that the release date be expedited to avoid further RM and a 5(f) release but would cost her a promotion and pension. Ms. Greening did not receive any COVID-19 injections. She was hospitalized after two previous vaccinations for the flu. Her CoC was supportive of an accommodation but stated Directive 002 meant no member would be accommodated on any grounds. She applied for a *CHRA* accommodation and was denied.

169. The Plaintiff, Eugene Pieter Greyling, was a member of the CAF and held the rank of Captain. He was a Pilot posted to CFB Gagetown until 8 June 2022 when he was released under a 5(f) category. He lives in Oromocto, New Brunswick. He has served honourably for over 15 years. Mr. Greyling did not receive any COVID-19 injections. He applied for a religious accommodation and was denied because his beliefs did not pass the legal test. He had been told by his CoC that there would be consequences for the request. Mr. Greyling was denied Employment Insurance benefits due to his release for misconduct.

170. The Plaintiff, Kevin Clarence J. Griffin, is a member of the CAF and holds the rank of Sergeant. He is a Gunner posted to CFB Gagetown. He lives in Geary, New Brunswick. He has served honourably for over 20 years. Sgt. Griffin did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation twice and was denied twice because his affidavits were deemed to be organized religion and not personal belief. He was denied necessary courses for promotion to the next rank. He was granted an extension on RM to receive an alternative to Moderna. Sgt. Griffin returned to work after Directive 003 and was initially paid his Land Duty Allowance then was told just before Christmas leave that it was removed as he was not vaccinated and he would have to repay what he had already received.

171. The Plaintiff, Dominic Joseph S. Guenette, was a member of the CAF and held the rank of Master Corporal. He was an Instructor posted to the Canadian

Forces Leadership and Recruit School at St-Jean-sur-Richelieu until 10 August 2022 under a 5(f) release category. He lives in Ste-Angele-Monnoir, Quebec. He has served honourably for over 12 years. Mr. Guenette did not receive any COVID-19 injections and has established natural immunity from infection. He did not apply for an accommodation due to medical leave for mental health issues. He has been placed on RM because of the Directives.

172. The Plaintiff, Darcy Wayne Hansen, was a member of the CAF and held the rank of Sergeant. He was an Artilleryman posted to 20th Independent Field Battery until March 2022 when he released under a 4(c) voluntary release to avoid a 5(f) category. He lives in Lethbridge, Alberta. He has served honourably for over 29 years. Mr. Hansen did not receive any COVID-19 injections and has established natural immunity from infection. His security clearance was cancelled due to the Directives. His CoC also told him that accommodation decisions would be made at the Brigade level. The CoC openly shared names of those who had not received the injections. He applied for a *CHRA* accommodation and was denied.

173. The Plaintiff, Brett Nevin Wellicome, is a member of the CAF and holds the rank of Sergeant. He is a Infanteer posted to CFB Wainwright. He lives in Edmonton, Alberta. He has served honourably for over 13 years. Sgt. Wellicome received two COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He has seen a complete breakdown in the trust in the CoC and the CAF during the implementation of all the Directives with a hostile and toxic work environment.

174. The Plaintiff, Rory Alexander Hawman, is a member of the CAF and holds the rank of Sergeant. He is an Infanteer posted to 3PPCLI in the role of Acting Warrant Officer. He lives in Edmonton, Alberta. He has served honourably for over 14 years. Sgt. Hawman received two COVID-19 injections. He was allowed to come in to work to complete his duties which could not be done from home while unvaccinated. Sgt. Hawman had his Land Duty Allowance removed due to the Directives, but this pay was restored when he complied with the injections. Sgt. Hawman has not received any final returns on his grievances.

175. The Plaintiff, James Adam Heald, was a member of the CAF and held the rank of Master Corporal. He was an Aviation Systems Technician posted to 14 Wing Greenwood until 23 June 2022 when he was released under a 5(f) release category. He lives in **Wilmot**, Nova Scotia. He has served honourably for over 18 years. Mr. Heald did not receive any COVID-19 injections. Christmas leave for the unvaccinated working from home was cut short compared to other members.
176. The Plaintiff, Kyle Keith Hepner, is a member of the CAF and holds the rank of Sailor First Class. He is a Material Management Technician posted at CFB Winnipeg. He lives in Winnipeg, Manitoba. He has served honourably for over 13 years. S1 Hepner received two COVID-19 injections to avoid a 5(f) release and to avoid leaving his troops severely understaffed. He applied for a *CHRA* accommodation and was denied. He applied for a religious accommodation and was denied.
177. The Plaintiff, Jason Stanley Gilbert Ignatescu, is a member of the CAF and holds the rank of Sailor 1. He is a Bosun posted at CFB Esquimalt. He lives in Victoria, British Columbia. He has served honourably for over 8 years. S1 Ignatescu received two COVID-19 injections to preserve his career. He was told by his CoC that he could not apply for a religious or a medical accommodation. His Terms of Service was close to ending and he requested to be on LWOP to finish but this was denied.
178. The Plaintiff, Thanarajan Jesuthasan, is a member of the CAF and holds the rank of Captain. He is an Aerospace Engineer Officer posted at Canadian Forces Recruiting Centre (“CFRC”) Detachment Ottawa. He lives in Gatineau, Quebec. He has served honourably for over 10 years. Capt. Jesuthasan did not receive any COVID-19 injections. During a period of acute mental health crisis, his medical file was accessed by a member of the CFRC staff without his consent or authorization. He was harassed and contacted by his CoC during this time despite medical leave. He was recommended for a release under the 5(f) category but is now on a return to work.
179. The Plaintiff, Kevin Thomas Johnson, was a member of the CAF and held the rank of Corporal. He was an Avionics Systems Technician posted to 405

Tactical Helicopter Squadron at CFB Petawawa until 24 April 2023. He lives in Petawawa, Ontario. He has served honourably for over 5 years. He was told by his CoC that the vaccinations were required to meet the terms of universality of service. Mr. Johnson did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. Cpl. Johnson was pulled from a course during class thereby revealing his status to everyone in the room. He was threatened with the loss of his Land Duty Allowance as well as his job and his military housing within two weeks. His promotion to Corporal was delayed and then awarded to entice him to be vaccinated and renew his Terms of Service. His medical privacy was breached several times by the CoC and medical unit staff. Mr. Johnson did not extend his service when offered a further 5 years because he would have been posted due to conflict during the implementation of the Directives.

180. The Plaintiff, Garry Adam Johnston, is a member of the CAF and holds the rank of Master Sailor. He is a Marine Technician posted at CFB Halifax. He lives in Halifax, Nova Scotia. He has served honourably for over 15 years. MS Johnston did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. Supervisors on ships openly discussed CAF members' attestations in front of other CAF members as well as civilian contractors. He was put off ship due to the Directives and assigned menial tasks despite two years of training to sail on that ship.

181. The Plaintiff, Ryan Gregory Jones, was a member of the CAF and held the rank of Sergeant. He was Acting Company Sergeant Major when the Directives were implemented. He was an Infanteer posted to 31 Canadian Brigade Group until 16 December 2021. He lives in Hamilton, Ontario. He has served honourably for over 18 years. Mr. Jones did not receive any COVID-19 injections. He deployed to work in long term care homes during COVID-19 outbreaks. He was denied any alternative arrangements that he suggested and was given 2 weeks to decide between retirement and being pushed through for a release under the 5(f) category. He chose to retire to protect his pension which he believed to be at risk. During his last two weeks, he was bullied and threatened in

attempts to coerce him into taking the injections. He now suffers from mental health issues requiring treatment.

182. The Plaintiff, Jamie Alexander Curtis Jorstad, is a member of the CAF and holds the rank of Sailor First Class. He is a Marine Technician posted at CFB Esquimalt. He lives in Victoria, British Columbia. He has served honourably for over 6 years. S1 Jorstad did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was recommended for a 5(f) release but remains serving in the CAF. S1 Jorstad has not received any final returns on his grievances.

183. The Plaintiff, Attila Stephen Kadlecsik, was a member of the CAF and holds the rank of Private. He is a Mobile Support Equipment Operator posted to Canadian Forces Logistics Training Centre until 5 July 2022 when he was released under a 5(f) category. He was informed by the Transition Centre of his pending release rather than from CoC as required under policy. He lives in Sharon, Ontario. He has served honourably for over 8 years. Mr. Kadlecsik did not receive any COVID-19 injections. He applied for a religious accommodation and was denied as his faith was more spiritual than religious. He was confined to barracks for months and when he ran out of testing kits, he was not supplied with more. Mr. Kadlecsik has not received any final returns on his grievances.

184. The Plaintiff, Dusty Lewis Kennedy, was a member of the CAF and holds the rank of Master Corporal. He was a Firefighter posted at CFB Comox where until 22 March 2022. He lives in Lazo, British Columbia. He served honourably for over 16 years. His release was done within only a few weeks and left his family homeless as no rental accommodations could be secured in that short amount of time. He was denied an extension of time in the Base Private Married Quarters while he relocated his family when the usual practice is to allow for up to 6 months to move. Mr. Kennedy did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied.

185. The Plaintiff, Hunter Elmer Kersey, was a member of the CAF and held the rank of Master Corporal. He was an Armoured Soldier posted to 31 Canadian

Brigade Group where he held the role as a Subject Matter Expert on Psychological Operations and Influence Activities, including for the initial COVID response, until 17 December 2022 when he was medically released. He lives in Oldcastle, Ontario. He served honourably for over 17 years. Mr. Kersey received ~~two COVID-19 injections~~ one COVID-19 injection of Janssen and has established natural immunity from infection. He applied for a CHRA accommodation due to his health from service-related injuries, including ~~cardiac~~ a transient ischemic attack and blood clotting, and received no response. His service injuries due to an explosion in Afghanistan have reached the point where he no longer meets universality of service requirements; and he is seeking a 3(b) medical release. His CoC has ~~not~~ communicated with him to release as his values did not align with the CAF since he submitted his release paperwork. There have been no RM against him.

186. The Plaintiff, Liam Owen Kiropoulos, was a member of the CAF and held the rank of Master Corporal. He was an Infanteer posted to the Cameron Highlanders of Ottawa and assigned to 33 Canadian Brigade Group as an Instructor until 12 February 2022 release under 4(c) category. He lives in Navan, Ontario. He has served honourably for over 8 years. Mr. Kiropoulos did not receive any COVID-19 injections and has established natural immunity from infection. When he enquired about how to apply for an accommodation, he was not provided with information or guidance from his CoC. He applied for a religious accommodation and was denied with no formal written reasons given for the denial. He was given 4 days to decide on a voluntary release or proceed to a 5(f) release. Mr. Kiropoulos was denied a transfer to the Supplemental Reserve and was told he was not authorized to see the policy used to support the denial. He has not received any final returns on his grievances.

187. The Plaintiff, Christopher Robert Knorr, was a member of the CAF and held the rank of Corporal. He was a Mobile support Equipment Operator posted at CFB Gagetown until 5 July 2022. He lives in Burton, New Brunswick. He has served honourably for over 9 years. Mr. Knorr did not receive any COVID-19 injections and has established natural immunity from infection. He was asked by



several different people in his CoC for his vaccination status and had to repeatedly provide it. He applied for a *CHRA* accommodation using the religious accommodation form as he was instructed to by his CoC and the request was then mishandled as a religious accommodation. He was denied the accommodation without written reasons. His Recorded Warning contained mistakes that the CoC corrected in pen but kept the original issue dates. For several days he was made to sit in an isolated area all day wearing a mask. He was the only one wearing a mask among his coworkers. He was denied the Christmas meal while his coworkers ate in front of him. He was reprimanded for removing his mask to drink a cup of coffee. Upon his release, he and his family were homeless while seeking other housing. They were not granted the usual extension to relocate.

188. The Plaintiff, Evan Victor Koziel, is a member of the CAF and holds the rank of Sergeant. He is an Aerospace Telecommunications and Information Systems Technician posted to Garrison Petawawa/427 Special Operations Aviation Squadron. He lives in Petawawa, Ontario. He has served honourably for over 22 years. After months of harassment, Sgt. Koziel received one COVID-19 injection without having to sign the consent form like others had done nor was he asked any screening questions. He then contracted COVID-19 and has established natural immunity from infection. Sgt. Koziel made it clear before his second injection that he was under extreme duress and the nurse administered the injection anyway. He was told that the Prime Minister and CDS were lawful authorities when he questioned the legality of the Directives.

189. The Plaintiff, Martin Phillippe Labrosse, is a member of the CAF and holds the rank of Sergeant. He is a Musician posted to Canadian Forces Support Group (Ottawa-Gatineau). He lives in Sarsfield, Ontario. He has served honourably for almost 25 years. Sgt. Labrosse did not receive any COVID-19 injections. He applied for a religious accommodation and was denied as his beliefs did not align with the leader of his faith. He received medical advice from an immunologist who advised against receiving COVID-19 injections. This medical advice was ignored by the CoC; and his medical accommodation

request was denied. He is under medical care for mental health issues related to the Directives. His 5(f) release was halted, and he was retained in service to complete the 2 years he needs to receive his full pension. Sgt. Labrosse has not received any final returns on his grievances.

190. The Plaintiff, Gerald JN-Fritz Lafortune, is a member of the CAF and holds the rank of Sergeant. He was an Infanteer posted to the Canadian Forces Leadership and Recruit School at CFB St. Jean as an Instructor with a transfer to the Transition Centre. He lives in Stoneham-et-Tewkesbury, Quebec. He has served honourably for over 14 years. Sgt. Lafortune did not receive any COVID-19 injections and has established natural immunity from infection. He did not apply for an accommodation because he was aware that none were being approved. His medical information was openly discussed in public spaces on the Base. He was on medical leave when the Directives were implemented but was contacted by his CoC and given 2 weeks to begin the injections. He was not given any options on the type of biologic he would have to receive. He was forced to attend at different Bases to sign paperwork, sometimes necessitating a longer drive to attend to his family.

191. The Plaintiff, Andre Lahaye, is a member of the CAF and holds the rank of Sergeant. He is an Infanteer posted Canadian Forces Leadership and Recruit School at CFB St. Jean as an Instructor. He lives in Saint-Constant, Quebec. He has served honourably for over 22 years. Sgt. Lahaye received two COVID-19 injections after significant pressure from his CoC. He applied for a religious accommodation and was denied. He applied for a *CHRA* accommodation and did not receive an answer. He was denied access to the visit of the CDS at an auditorium because unvaccinated members were banned from the event. Immediately following his second dose, Sgt. Lahaye developed cardiac issues requiring a specialist's care. This has a significant impact on his career in the CAF, including being placed in a lesser position due to medical leave to receive care for his heart problems.

192. The Plaintiff, Kelly-Lee Marie Lake, was a member of the CAF and held the rank of Master Corporal. She was a Material Management Technician posted

at Richmond, British Columbia until 7 November 2022. She lives in Starbuck, Manitoba. She has served honourably for over 16 years. She was preparing to have a 3(b) medical release for service-related injuries when the Directives were implemented. Ms. Lake did not receive any COVID-19 injections and has established natural immunity from infection. She did not apply for an accommodation as all the requests she had known about were denied. She had a promotion and more advanced role rescinded even though she had already accepted the offer. There was a great deal of confusion as she was advised by different agencies to expedite her medical release or voluntarily release to avoid a 5(f) category.

193. The Plaintiff, Nicholas Edward Lange, was a member of the CAF and holds the rank of Corporal. He was a Materials Technician posted to 202 Workshop Depot until 6 June 2022 under a 5(f) release category. He lives in ~~Montreal, Quebec~~ Redwater, Alberta. He served honourably for over 10 years. Mr. Lange did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He was told by MWO Pelletier in his CoC that no accommodations were granted in his unit. Mr. Lange was denied a request for a voluntary release under 4(c) rather than receive 5(f). He was told this was not an option for him due to RM.

194. The Plaintiff, Sarah-Emilie Lasnier, is a member of the CAF and holds the rank of Master Sailor. She is a Steward posted to Italy. She lives in Frankford, Ontario. She has served honourably for over 11 years. MS Lasnier received two COVID-19 injections and suffered a vaccine injury after the second dose. She applied for a medical accommodation for any booster injections and was denied.

195. The Plaintiff, Dominic Joseph M. Lavoie, is a member of the CAF and holds the rank of Master Corporal. He is an Aviation Systems Technician posted to CFB Bagotville. He lives in Jonquiere, Quebec. He has served honourably for over 17 years. MCpl. Lavoie did not receive any COVID-19 injections. While on a training course at CFB Trenton, he was forced to wait outside the busy Mess Hall to receive his food and leave. He applied for a *CHRA* accommodation and was

denied. He was put on RM and his file reached DMCA; he was retained under Directive 003.

196. The Plaintiff, Tara Lavoie, was a member of the CAF and held the rank of Corporal. She was a Financial Services Administrator posted to CFB Bagotville until 10 December 2021. She lives in Jonquiere, Quebec. She served honourably for over 7 years. Her medical file was under review for a 3(b) medical release when the Directives were implemented. Ms. Lavoie received one COVID-19 injection after she was told she would lose her medical release if she remained unvaccinated. She applied for a *CHRA* accommodation and was denied.

197. The Plaintiff, Drake Michael Le Couteur, was a member of the CAF and held the rank of Sailor First Class. He was a Clearance Diver posted at CFB Esquimalt until 15 December 2022 when he released under a 5(f) category for factors within his control. He lives in Victoria, British Columbia. He has served honourably for over 6 years. Mr. Le Couteur did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He was on medical leave for an injury when the Directives were implemented.

198. The Plaintiff, Marc Leclair, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted to the North Shore-New Brunswick Regiment until March 2022 when he released under a 4(c) category to escape toxic working conditions. He lives in **Caissie Road, New Brunswick**. He served honourably for over 19 years. Mr. Leclair did not receive any COVID-19 injections after two attempts where his anxiety reached the point of physical illness. He experienced name-calling and bullying by his peers as his status was not protected by the CoC. He suffered significant weight loss and insomnia due to anxiety. He applied for a *CHRA* accommodation and was denied with no written reasons given. He and his family have suffered significant financial struggles since his release.

199. The Plaintiff, Pierre Lemay, was a member of the CAF and held the rank of Master Corporal. He was a Human Resources Administrator with 52 Field Ambulance posted to 4 Health Services Group Montreal until 11 March 2022 under a 5(f) category though he also received a letter of termination for his

position effective 15 December 2021. He lives in Sherbrooke, Quebec. He served honourably for over 32 years. Mr. Lemay did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. Mr. Lemay has not received any final returns on his grievances.

200. The Plaintiff, Jonathan Joseph A. Lemire, was a member of the CAF and held the rank of Master Sailor. He was a Marine Technician posted to CFB Halifax until 30 May 2022 when he was released under a 3(b) category. He lives in Quebec. He served honourably for over 13 years. Due to an Operational Stress Injury, Mr. Lemire was expecting a medical release under a 3(b) category on 15 July 2022. He was threatened with a 5(f) release due to not meeting the universality of service requirement due to not being vaccinated. He was already not meeting universality of service due to his medical diagnosis. Mr. Lemire did not receive any COVID-19 injections.

201. The Plaintiff, Daniel Paul Loader, is a member of the CAF and holds the rank of Corporal. He is a Vehicle Technician posted to Denison Armoury. He lives in Oshawa, Ontario. He has served honourably for over 16 years. He applied for a religious accommodation and was denied. He received RM before the decision was made on his accommodation request so he was told the RM on his file would be destroyed. Upon the denial of his request, RM were initiated against him but never completed and he was retained.

202. The Plaintiff, Garrett Curtis Logan, was a member of the CAF and held the rank of Master Corporal. He was an Avionics Systems Technician with 436 Transport Squadron posted to CFB Trenton until he was released under a 5(f) category on 13 May 2022. He lives in Trenton, Ontario. He served honourably for over 13 years. Mr. Logan did not receive any COVID-19 injections. CAF members were told prior to the Directives that the COVID-19 injections were mandatory to deploy. Several members on that deployment took them and then found out it was not mandatory. On the deployment, unvaccinated members were required to wear N95 masks outside in 50+ degrees Celsius and were yelled at for lowering their masks to drink water. He asked to apply for a religious accommodation but was told there would be none with no exceptions.

203. The Plaintiff, Jordan Terrence Logan, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted to Canadian Division Training Centre CFB Wainwright until 28 June 2022 with a release under a 5(f) category. He lives in Carberry, Manitoba. He has served honourably for over 9 years. Mr. Logan did not receive any COVID-19 injections. One of his punishments for not complying with the Directives was to be removed from range control to serving food in the canteen. He applied for a *CHRA* accommodation and was denied. Mr. Logan has not received any final returns on his grievances.
204. The Plaintiff, Alexandre Guy Richard Loiselle, was a member of the CAF and held the rank of Corporal. He was an Avionics Systems Technician posted to 406 (Maritime) Operational Training Squadron until 15 May 2022 with a release category of 5(f) after months of being ordered on isolation at home. He lives in South Maitland, Nova Scotia. He has served honourably for over 8 years. Mr. Loiselle did not receive any COVID-19 injections. Testing for COVID-19 was carried out in public in his unit with a supervisor. There was no privacy and the unvaccinated were clearly marked out for other members to see. He applied for a *CHRA* accommodation and was denied. He received RM before the decision was made on his accommodation request.
205. The Plaintiff, Adam Fernand C. Lupien, was a member of the CAF and held the rank of Corporal. He was a Combat Engineer posted to 5 Combat Engineer Regiment until 13 May 2023 when he released under a 4(c) category. He lives in Ste-Catherine-de-la-Jacques-Cartier, Quebec. He has served honourably for over 7 years. Mr. Lupien did not receive any COVID-19 injections. He was told members who did not comply with the Directives would be placed on LWOP. His CO told him had no place in the CAF and should have been released long ago. His CoC was unable to answer questions he had about the Directives. He applied for a *CHRA* accommodation and was denied. He also applied for a religious accommodation and was denied. His first request for a voluntary release was never submitted to DMCA. He had to make a second request. He has service-related injuries but was denied a medical release.

206. The Plaintiff, Walter George Lyon, was a member of the CAF and held the rank of Corporal. He was a Material Management Technician posted to CFB Trenton until he was released on 23 June 2022 under the 5(f) category. He lives in Trenton, Ontario. He served honourably for over 8 years. Mr. Lyon did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. After the commencement of RM, he was sent home with a laptop and told he was no longer allowed in the workplace. The Military Ombudsman referred him to the Privacy Commissioner. Mr. Lyon has not received any final returns on his grievances.
207. The Plaintiff, Joseph Brefni W. MacDonald, is a member of the CAF and holds the rank of Corporal. He is a MP posted at 1 Military Police Squadron. He lives in Moose Jaw, Saskatchewan. He has served honourably for over 4 years. Cpl. MacDonald did not receive any COVID-19. His attestation was incorrect and entered by a superior without his knowledge or consent. Cpl. MacDonald consulted with an allergist who advised him that he would have a reaction to the vaccine. He was told to still have it but at a hospital where he could receive immediate treatment for an allergic reaction. He applied for a religious accommodation and was approved. He was denied a career course because the Commandant of the Academy has the opinion that there should be no accommodations. Cpl. MacDonald has not received any final returns on his grievances.
208. The Plaintiff, Christien Tavis Roger MacDonnell, is a member of the CAF and holds the rank of Petty Officer Second Class. He is a Marine Technician with PO2 West Coast Navy Patrol Craft Training Unit posted to CFB Esquimalt. He lives in Esquimalt, British Columbia. He has served honourably for over 22 years. PO2 MacDonnell did not receive any COVID-19. He noted that to enter an attestation of requesting accommodation, he was required to upload Protected B documents into a system not authorized for this type of document. He applied for a religious accommodation and, after several steps, was approved by Vice Admiral (then Rear Admiral) Al Topshee.

209. The Plaintiff, Jean Joseph Madore, was a member of the CAF and held the rank of Corporal. He was a Mobile Support Equipment Operator with 35 Service Battalion posted at St-Malo Military Complex until 25 April 2022. He lives in Quebec City, Quebec. He served honourably for over 35 years. He released under a 4(c) category rather than be forced release of 5(f). His first attempts to voluntarily release had no response from his CoC. He was involved in the COVID-19 response. Mr. Madore did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied four months after it was submitted. He experienced humiliating events from being trained on testing kits by a gunner from the artillery trade to being called out about testing on an open Facebook page which resulted in one of his peers making unpleasant comments without reprimand from the superior who had made the original comment. He was also subjected to an error in his release paperwork which had documents showing he had 9 years of service instead of the actual 35 years of service. His CoC replied that this mistake was no longer their concern. Mr. Madore has not received any final returns on his grievances.

210. The Plaintiff, Charles Joseph J. Magnan, was a member of the CAF and held the rank of Master Corporal. He was an Electrical and Mechanical Engineer posted to the Canadian Forces Leadership and Recruit School until 12 July 2022 when he was released with a 5(f) category. He lives in Carignan, Quebec. He has served honourably for over 13 years. Mr. Magnan did not receive any COVID-19 injections. His CoC strongly encouraged that he voluntarily releases to avoid the 5(f) category. He was not allowed to attend a meeting where the CDS was present.

211. The Plaintiff, Andrew Robert Paul Mallory, was a member of the CAF and held the rank of Corporal. He was a Material Management Supply Technician posted to 7 Canadian Forces Supply Depot at CFB Edmonton until 8 May 2022 when he was released with a 5(f) category. He lives in Sturgeon County, Alberta. He has served honourably for over 4 years. Mr. Mallory did not receive any COVID-19 injections. He applied for a religious accommodation twice and was



denied both times. He was considered ineligible for the Special Commissioning Plan to become an officer strictly because of his vaccination status. He was demoted to the rank of Private upon his release. Mr. Mallory has not received any final returns on his grievances.

212. The Plaintiff, Marylene Ginette S. Martin, was a member of the CAF and held the rank of Sergeant. She was a Special Operations Forces Operator posted at CANSOFCOM until 18 January 2022. She lives in Ogden, Quebec. She has served honourably for over 20 years. Ms. Martin did not receive any COVID-19 injections. She was asked by the CoC for her vaccination status well before the Directives were issued then told to test 3 times per week. In anticipation of mandatory COVID injections, she chose a voluntary release under a 4(c) to preserve her pension which was only a few months of service away. Her retirement did not result in the usual supports to allow a member to transition to civilian life. She has struggled without the necessary supports in place.

213. The Plaintiff, Marco Mastantuono, is a member of the CAF and holds the rank of Sergeant. He is a Infanteer posted at Canadian Forces Leadership and Recruit School. He lives in Laval, Quebec. He has served honourably for over 24 years. Sgt. Mastantuono did not receive any COVID-19 injections. He was subject to RM. He applied for a religious accommodation and was denied. He also applied for a *CHRA* accommodation and was denied. He was informed of Directive 003 through media coverage rather than his CoC. The clerk tried to dissuade him from submitting grievance paperwork; he proceeded with it. Sgt. Mastantuono has not received any final returns on his grievances.

214. The Plaintiff, Jamie Richard McEwen, was a member of the CAF and held the rank of Captain. He was a Pilot posted to 1 Field Ambulance Suffield until 15 March 2023 with a release under a 4(c) category. He lives in Cochrane, Alberta. He has served honourably for over 7 years. He chose not to disclose his vaccination status. He had witnessed intimidation, harassment, segregation, and hateful discourse directed at his colleagues who chose not to be vaccinated. Mr. McEwen did not receive any COVID-19 injections and has established natural immunity from infection. He did not apply for a religious accommodation to save

himself the inquisition that others had endured after requesting such accommodation. After being under RM, he requested an expedited release due to service-related injuries and civilian employment opportunities. DMCA and his CoC were unresponsive. He was unable to action his own release due to being on a Restricted Release program.

215. The Plaintiff, Johannes Wouter Mulder, is a member of the CAF and holds the rank of Second Lieutenant. He is a Logistics Officer posted to The Royal Westminster Regiment. He lives in Hope, British Columbia. He has served honourably for over 13 years. 2Lt. Mulder did not receive any COVID-19 injections. He has service-related injuries which breach the universality of service requirements. He applied for a religious accommodation and was granted one after nearly four months with severe restrictions on his participation in Regiment activities. He found the process onerous and invasive compared to requests for religious accommodation for reasons other than the COVID-19 injections.

216. The Plaintiff, Tyler Edwin Neufeld, is a member of the CAF and holds the rank of Corporal. He is an Infanteer with the 1PPLCI posted at CFB Edmonton. He lives in Fort Saskatchewan, Alberta. He has served honourably for over 7 years. Cpl. Neufeld did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was forced to march and stand at attention in front of other members of the Battalion to receive his RM. He was on medical limitations for a service-related injury and requested a medical release to continue his recovery. His last contact with the CAF was 8 months before he was told to return to duty after Directive 003. He was informed that all his accumulated leave was taken away and leave passes had been approved without his signature. He is now awaiting a medical release for his injuries.

217. The Plaintiff, Laura Lee Nicholson, is a member of the CAF and holds the rank of Corporal. She is a Financial Services Administrator posted to CFB Trenton. She lives in Trenton, Ontario. She has served honourably for over 4 years. Cpl. Nicholson did not receive any COVID-19 injections. When she expressed that her mental health was deteriorating due to the isolation of working from home, her CoC told her she was being insubordinate, but they would

overlook it. She applied for a *CHRA* accommodation and was denied. There were some RM but with Directive 003 she was returned to the workplace and told she was going to be promoted for her work.

218. The Plaintiff, Merriam Nixon, is a member of the CAF and holds the rank of Captain. She is a Cadet Instructor Cadre Officer posted to the Cadet Instructor Cadre. She lives in Ship Harbour, Nova Scotia. She has served honourably for over 24 years. Capt. Nixon did not receive any COVID-19 injections. RM were commenced against her but cancelled with Directive 003. She has found the return to duty a challenge after being called names, slandered with assumptions about her world view, and being shunned by colleagues who were previously welcoming. ~~Capt. Nixon has not received any final returns on her grievances.~~  
~~Capt. Nixon's grievances have been denied.~~

219. The Plaintiff, Jonathan Noel, is a member of the CAF and holds the rank of Master Corporal. He is a Search and Rescue Technician posted to 435 Transport and Rescue Squadron at CFB Winnipeg. He lives in Winnipeg, Manitoba. He has served honourably for over 15 years. MCpl. Noel received two doses of NOVAVAX COVID-19 injections under duress to keep his employment. He applied for a *CHRA* accommodation and was denied. He was not given the opportunity to use other measures such as an N95 mask, testing or social distancing so that he could access the Mess, gym or social events. When he tried to access mental health services on Base he was told he could not access the hospital and would end up waiting an additional 4 weeks for help when in crisis. Another member of his work team committed suicide a few weeks after MCpl. Noel had tried to access help. He was welcomed back to the workplace after being vaccinated as if nothing had happened in the months before.

220. The Plaintiff, Joshua Bruce Olson, was a member of the CAF and holds the rank of Corporal. He is an Armoured Crewman with the Royal Canadian Dragoons posted to CFB Petawawa until 8 June 2022 with a 5(f) release category. He lives in Brooks, Alberta. He has served honourably for almost 9 years. Mr. Olson did not receive any COVID-19 injections He applied for a religious accommodation and was denied.

221. The Plaintiff, Caroline Mary Audrey Ouellet, was a member of the CAF and held the rank of Corporal. She is a Search and Rescue Technician posted to 19 Wing Comox until 5 July 2022 when she was released under category 5(f). She lives in Lazo, British Columbia. She has served honourably for over 13 years. Ms. Ouellet did not receive any COVID-19 injections. She applied for a *CHRA* accommodation as a medical accommodation was not available despite contraindications to the COVID-19 injections; the accommodation request was denied.
222. The Plaintiff, Joseph Anthony Papalia, is a member of the CAF and holds the rank of Captain. He is an Infantry Officer posted at 31 Canadian Brigade Group. He lives in London, Ontario. He has served honourably for over 7 years. Capt. Papalia did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He did request that if he was to be released due to the Directives, it would be under a 5(d) category rather than 5(f). He has not received any final returns on his grievances.
223. The Plaintiff, Melanie Marie I. Pare, was a member of the CAF and held the rank of Sergeant. She was a Musician posted to the Royal 22<sup>nd</sup> Regiment Band until she was released on 2 August 2022 under a 5(f) category. She lives in Ste-Catherine-de-la-Jacques-Cartier, Quebec. She has served honourably for over 13 years. Ms. Pare did not receive any COVID-19 injections. She applied for a religious accommodation and was denied. She has not received any final returns on her grievances as the grievances were only acknowledged after her release. She has struggled with her mental health as she was not able to access supports to aid her transition to civilian life. She resorted to cashing in her pension early to support her needs.
224. The Plaintiff, Alexandru Patularu, was a member of the CAF and held the rank of Master Corporal. He was a Material Management Technician posted at CFB Kingston until 21 July 2022 under a 5(f) release category. He lives in Kingston, Ontario. He has served honourably for over 13 years. He was able to see the vaccination status for every member in his section in MM. He was initially told he would be out in a few weeks, but this did not happen. Mr. Patularu did not

receive any COVID-19 injections. He applied for a religious accommodation and was denied.

225. The Plaintiff, Joshua Alexander Pickford, is a member of the CAF and holds the rank of Master Corporal. He is an Infanteer with 1PPCLI posted at CFB Edmonton. He lives in Lancaster Park, Alberta. He has served honourably for over 13 years. MCpl. Pickford did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied by a Review Board lead by the Brigade Commander, Brig Gen (then Colonel) LW Rutland. He was on RM and told to remain at home. Upon his return to Battalion with the Directive 003, his CoC has been trying to post him to a Base with a high cost of living.

226. The Plaintiff, Agnes Pinter-Kadlecsik, is a member of the CAF and holds the rank of Corporal. She is a Cook posted at CFB Borden. She lives in Sharon, Ontario. She has served honourably for over 10 years. Cpl. Pinter-Kadlecsik did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a religious accommodation and was denied. The officer who assisted her with the request had his accommodation granted. RM commenced prior to the decision on her request. While on RM, she received an offer to renew her Terms of Service and continue her service in the CAF despite a recommended release of 5(f). She renewed her service for 4 more years. Cpl. Pinter-Kadlecsik has not received any final returns on her grievances.

227. The Plaintiff, Jean-Simon Plamondon, was a member of the CAF and held the rank of Corporal. He was a Signals Intelligence Specialist with 4 Intelligence Company posted to CFB Valcartier until February 2022 when he voluntarily released to avoid further RM and the 5(f) release. He lives in Sante-Ursule, Quebec. He has served honourably for over 6 years. Mr. Plamondon did not receive any COVID-19 injections. He was not allowed to perform any duties, even by remote work. He offered to be on LWOP until the Medicago vaccine was available, but his CoC denied that request. He applied for a *CHRA* accommodation and was denied.

228. The Plaintiff, Krister Alexander Pohjolainen, was a member of the CAF and held the rank of Sergeant. He was an Infanteer with 2PPCLI posted at CFB Shilo until 14 June 2022 under the 5(f) category. He lives in Thunder Bay, Ontario. He served honourably for over 25 years. Mr. Pohjolainen did not receive any COVID-19 injections. He was given the briefing note for Chaplains which outlined the reasons to not accept requests for religious accommodation. His CoC and the Padre told him to disregard the briefing note. He applied for a religious accommodation and was denied with the denial closely following the briefing note. Mr. Pohjolainen has not received any final returns on his grievances. He and his family are struggling with his release, including getting care for his disabled wife. They currently live with family until they can afford housing of their own.

229. The Plaintiff, Aura A. Pon, was a member of the CAF and held the rank of Lieutenant (Navy). She was a Naval Warfare Officer posted HMCS TECUMSEH with a position of Western Region's Naval Reserve Centennial Coordinator until 4 April 2022 when she voluntarily released to avoid further RM. She lives in Calgary, Alberta. She served honourably for over 18 years. Ms. Pon did not receive any COVID-19 injections. She was falsely accused of hateful conduct during the COVID-19 response. She applied for a religious accommodation with remote work as she had done since 2018 and was denied. The accommodation was supported by each level of the CoC until it reached Vice Admiral (then Rear Admiral) Al Topshee. Ms. Pon has not received any final returns on her grievances.

230. The Plaintiff, Brody Allen Poznikoff, was a member of the CAF and held the rank of Sailor First Class. He is a Marine Technician posted to HMCS OTTAWA until 2 August 2022 when he released under a 5(f) category. He lives in Victoria, British Columbia. He has served honourably for over 6 years. M. Poznikoff did not receive any COVID-19 injections. He applied for a *CHRA* accommodation followed by an interview with a Padre that was more an interrogation; his request denied. RM measures were commenced almost two months before the decision on his request for accommodation was made.

231. The Plaintiff, Stefan Prisacari, is a member of the CAF and holds the rank of Lieutenant (Navy). He is training to be a Logistics Officer posted at CFB Halifax. He lives in Halifax, Nova Scotia. He has served honourably for over 5 years. Lt. (Navy) Prisacari received one Pfizer COVID-19 injection and suffered several adverse events the next day requiring medical care. and has established natural immunity from infection. He applied for a religious accommodation and was denied. He had already been moved to Canadian Fleet Atlantic Headquarters as the outcome of his request had been predetermined. Lt. (Navy) Prisacari has not received any final returns on his grievances.
232. The Plaintiff, ~~Monica A.~~ **Monika Anna** Quillan, was a member of the CAF and held the rank of Chief Petty Officer. She was a Marine Technician posted to Director General Maritime Equipment Program Management until 22 June 2022 under a voluntary release to avoid a 5(f) which would compromise future employment with government agencies. She lives in Gloucester, Ontario. She served honourably for over 32 years. Ms. Quillan did not receive any COVID-19 injections. She applied for a religious accommodation and was denied. She was unable to obtain documentation concerning her accommodation process as the Access to Information requests turned up no records to disclose.
233. The Plaintiff, Romain Racine, was a member of the CAF and held the rank of Corporal. He was an Avionics Systems Technician with 433 Tactical Fighter Squadron posted to CFB Bagotville until he released on 31 May 2023 with a voluntary 4(c) category. He lives in Chicoutimi, Quebec. He served honourably for over 8 years. His vaccination status was entered into MM by his supervisor without his consent. Mr. Racine did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. RM were commenced prior to the decision on the accommodation request. He submitted a response to the Administrative Review then heard nothing for months until contacted by his CoC to return to duty following Directive 003 being issued. He sought a transition to work program to assist his mental health three times and was told by health care providers that the solution was to release from the CAF. In a last effort to salvage his mental health, he requested a 4(c) voluntary release for 31 May 2023.

234. The Plaintiff, Dominic Laurens William Ragetli, was a member of the CAF and held the rank of Captain. He was a Pilot posted at CANSOFCOM Headquarters. He lives in Petawawa, Ontario. He has served honourably for over 13 years. Mr. Ragetli did not receive any COVID-19 injections. He refused the COVID-19 injections before the Directives were issued and was told he would be put on LWOP for several months. He sold his home because of that threat. He was never placed on LWOP as this is not a policy for the CAF. He was removed from operations and then from instructing in the training cell and assigned to work from home. He applied for a religious accommodation and was denied. Mr. Ragetli had planned a 25-year career in the CAF but could no longer support the CAF. He released at the end of his Terms of Service on 18 June 2022 under a 4(b) category. He was told the CAF may change his release category to a 5(f) if CAF chooses to do so. This action is not possible under current CAF policy.

235. The Plaintiff, Stephane Ratte, was a member of the CAF and held the rank of Sergeant. He was a Financial Services Administrator with the Saguenay Regiment posted at ~~CFB Bagotville~~ Régiment du Saguenay until 15 March 2022. He lives in Jonquiere, Quebec. He has served honourably for over 24 years. Mr. Ratte did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. RM commenced several weeks before the decision was made on my accommodation request. He informed his CoC that he would have the Medicago vaccine, but this did not halt the RM. To stop the RM, Mr. Ratte voluntarily released under a 4(c) category. He was two years of service from his full pension.

236. The Plaintiff, Bryan Thomas Richter, was a member of the CAF and held the rank of Corporal. He was a Vehicle Technician posted to Lieutenant-Colonel George Taylor Denison III Armoury until 23 June 2022 when he was released under a 5(f) category. He lives in Barrie, Ontario. He has served honourably for over 5 years. Mr. Richter did not receive any COVID-19 injections. He was banned from attending the building and was not offered online courses to remain current and active within CAF. He did not apply for an accommodation as he did not believe he was eligible to receive one.



237. The Plaintiff, William Rios, was a member of the CAF and held the rank of Corporal. He was an Aviation Systems Technician with 400 Tactical Helicopter Squadron posted CFB Borden. He lives in Mississauga, Ontario. He has served honourably for over 17 years. Mr. Rios did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. The RM were accelerated after he applied for a 4(c) voluntary release. The CoC recommended a 5(f) release. He had to make a second application for a voluntary release which led to his release under 4(c) on 17 June 2022.
238. The Plaintiff, Jenna Leigh Roberts, is a member of the CAF and holds the rank of Sailor First Class. She is a Port Inspection Diver posted at HMCS DISCOVERY. She lives in West Kelowna, British Columbia. She has served honourably for over 3 years. SFC Roberts did not receive any COVID-19 injections. She applied for a religious accommodation and was denied. She lost her diving qualifications after being denied diving opportunities for over 90 days. She was denied the return of her dry suit from CFB Halifax. She asked to go on a recertification course however there has been no response from the CoC and no communications since Directive 003. SFC Roberts officially remains a member of the CAF.
239. The Plaintiff, Joshua Calvin Roberts, was a member of the CAF and held the rank of Second Lieutenant. He was a Pilot posted at 19 Wing CFB Comox until he released on 30 May 2023 with a 4(c) voluntary category. He lives in Campbell River, British Columbia. He has served honourably for over 5 years. Mr. Roberts did not receive any COVID-19 injections. He applied for a religious accommodation and was denied.
240. The Plaintiff, Laurie Rose, was a member of the CAF and held the rank of Sergeant. She was a Human Resources Administrator with 5 Canadian Division Support Base posted to CFB Gaagetown until 18 April 2022. She lives in Burton, New Brunswick. She served honourably for over 20 years. Ms. Rose did not receive any COVID-19 injections and has established natural immunity from infection. She had applied for a voluntary release before Directive 001 required an attestation due to the stress of the Directives and was denied due to staffing

issues. One day after her attestation, she was told to train her replacement before she was no longer allowed on Base. When she is in the office, her coworkers pretend they do not see her. She witnessed vaccine injuries and was concerned for her own health. RM commenced on the same day her husband medically released from the CAF and she was denied leave to support him. Three weeks before her release, she was told to come back in to work due to the unit being short staffed. She was told to get a medical pass to not be on duty. The nurse at the clinic aggressively refused to give any leave despite Ms. Rose's distress. Her CoC then told her she did not need to return to duty. Her family has not had an easy transition to civilian life. Ms. Rose has been contacted to return to the CAF but has declined the offers.

241. The Plaintiff, Rory Alexander David Rosen, was a member of the CAF and held the rank of Second Lieutenant. He was an Infantry Officer posted at CFB Gagetown. He lives in Lakeshore, Ontario. He has served honourably for over 2 years. Mr. Rosen did not receive any COVID-19 injections and has established natural immunity from infection. He was required to live in barracks and could not participate in any form of training or duties. He applied for a religious and a *CHRA* accommodation and was denied both. After the uncertainty of the Directives and RM leading to a 5(f) release, he voluntarily released in October 2022.

242. The Plaintiff, Sebastien Salvat, was a member of the CAF and held the rank of Corporal. He is an Infanteer posted to the 2<sup>nd</sup> Division Training Centre. He lives in Shannon, Quebec. He has served honourably for over 29 years. Mr. Salvat did not receive any COVID-19 injections. He did not apply for an accommodation because all were being denied. Testing three times a week was done openly beside the Canteen and only on the unvaccinated who were not allowed privacy for the testing. He received RM for a 5(f) release. After a review of his medical file, he was released under the medical category 3(b) for breach of universality of service on 17 October 2022.

243. The Plaintiff, Cameron Ray S. Sanders, was a member of the CAF and held the rank of Corporal. He was an Avionics Systems Technician with 429

Squadron and 8 Air Maintenance Squadron posted to CFB Trenton until 31 August 2023 when he was released under the 5(f) category. He lives in Brighton, Ontario. He has served honourably for over 23 years. Mr. Sanders did not receive any COVID-19 injections. He applied for a medical accommodation for known cardiac issues and was denied. The CO has not delivered any of the paperwork he is required to do personally during RM.

244. The Plaintiff, Carl Jean G. Savard, was a member of the CAF and holds the rank of Corporal. He is an Avionics ~~Systems~~ Navigation Technician with 425 Squadron posted to CFB Bagotville until 12 June 2022 under a 5(f) category. He lives in La Baie, Quebec. He has served honourably for over 8 years. Mr. Savard did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied.

245. The Plaintiff, Torsten Schulz, was a member of the CAF and held the rank of Warrant Officer. He was a Senior Preventive Medicine Technician posted to 1 Canadian Field Hospital Detachment Ottawa until 30 April 2022 when he released under a 4(c) category due to concerns he would lose his pension with a 5(f) release. He lives in Murillo, Ontario. He served honourably for over 32 years. Mr. Schulz did not receive any COVID-19 injections. He applied for a religious accommodation with 1-2 days' notice and was denied by the higher CoC when the Padres supported his accommodation. He was supposed to receive testing kits, but these never arrived. Mr. Schulz was denied an opportunity with the Reserves that was to commence just as the Directives were issued.

246. The Plaintiff, Paul Russell Shapka, was a member of the CAF and held the rank of Master Corporal. He was an Imagery Technician posted to 3 Canadian Division Support Base at CFB Edmonton until 24 February 2023 when he was released under a medical category following a release medical for a 5(f) category. He lives in Bon Accord, Alberta. He served honourably for over 18 years. Mr. Shapka did not receive any COVID-19 injections. Upon entering his vaccination status in MM, he saw all members below himself as well as at CFB Wainwright's imaging shop. When he reported this to his CoC, they were unconcerned. He applied for a religious accommodation and was denied. One

point on the religion assessment states that the CDS Directive 002 is a higher threshold than other CAF policies. He was required to test three times a week even after Directive 003 was issued.

247. The Plaintiff, Blake Alexander Sheedy, is a member of the CAF and holds the rank of Sailor Third Class. He is a Musician posted to HMCS YORK. He lives in Oakville, Ontario. He has served honourably for over 2 years. S3 Sheedy did not receive any COVID-19 injections. He was not aware of being made Non-Effective Strength until he received a notice in the mail despite being assigned a task by his CoC. He applied for a religious accommodation and was denied. The CoC suggested he apply for a voluntary release to avoid a 5(f) category. His file for a 5(f) release was never processed before Directive 003. S3 Sheedy transferred from HMCS STAR to HMCS YORK for a fresh start with a new CoC.

248. The Plaintiff, Quinton James Stender, is a member of the CAF and holds the rank of Master Corporal. He is an Armoured Soldier with Lord Strathcona's Horse (Royal Canadians) posted to CFB Edmonton. He lives in St. Albert, Alberta. He has served honourably for over 11 years. MCpl. Stender did not receive any COVID-19 injections. Upon his return from PATA, he was to work from home. If he went into work, he was specifically told to wear a blue mask which stood out from the cloth masks worn by everyone else. He applied for a religious accommodation and was denied. The administrative paperwork for his 5(f) release never left the Regiment and he was retained after Directive 003. Upon his return to work in person, he was glared at and called derogatory names in front of his subordinates. Members would cover their faces or shout for others to get away from him. The CoC did not intervene in this discriminatory behaviour. MCpl. Stender has been told he will be posted out of Edmonton this year with few options and his career is over.

249. The Plaintiff, Caleb Ethan M. Stener, was a member of the CAF and holds the rank of Corporal. He is an Avionics Systems Technician with 431 Air Demonstration Squadron posted to CFB Moose Jaw until. He lives in Bushell Park, Saskatchewan. He has served honourably for over 6 years. Mr. Stener did not receive any COVID-19 injections and has established natural immunity from

infection. He was told very clearly that he would be put on LWOP if not vaccinated. He applied for a religious accommodation and was denied.

250. The Plaintiff, Gabriel-Alexandre St-Gelais, was a member of the CAF and held the rank of Master Corporal. He was an Aviation Systems Technician posted to Regiment du Saguenay until he was released on 28 April 2022 under a 5(f) category. He lives in Alouette, Quebec. He has served honourably for over 18 years. Mr. St-Gelais did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied.

251. The Plaintiff, Nicolas Joseph St-Germain, was a member of the CAF and held the rank of Sergeant. He was a Vehicle Technician posted to CFB Bagotville until 1 August 2022 when he was released under a 4(c) category to avoid a 5(f) release. He lives in Chicoutimi, Quebec. He has served honourably for over 16 years. Mr. St-Germain did not receive any COVID-19 injections. He was asked by the CoC to canvas others for their vaccination status which he refused to do on the grounds of medical privacy. Mr. St-Germain requested a voluntary release upon the Directives being implemented. He applied for a religious accommodation and was denied. RM were put in place after his accommodation request was denied.

252. The Plaintiff, Robert Christopher Stull, is a member of the CAF and holds the rank of Corporal. He is an Aerospace Telecommunication Information Systems Technician posted to CFB Halifax. He lives in Eastern Passage, Nova Scotia. He has served honourably for over 15 years. Cpl. Stull did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. Email exchanges during the decision-making for his accommodation request revealed the names of two other members who were also applying for an accommodation. He also applied for an accommodation under the *CHRA* and was denied. He was recommended for release under a 5(f) category but is still retained in service.

253. The Plaintiff, James Roark Suter, is a member of the CAF and holds the rank of Sailor First Class. He is a Sonar Operator posted to Maritime Operations

Group 5 Headquarters. He lives in Head of Chezzetcook, Nova Scotia. He has served honourably for over 4 years. S1 Sutter did not receive any COVID-19 injections. He has known coping issues which were made worse with the Directives and the reaction on his shipmates discouraged him from seeking treatment. Eventually, he admitted himself to treatment at a hospital. He had to withdraw from a career course due to constantly being removed from class to discuss his vaccination status with the CoC. S1 Suter asked if the Johnson & Johnson COVID-19 injection would be acceptable and was told it was not by nursing staff and the Base Surgeons. He applied for a religious accommodation and was denied. S1 Suter has not received any final returns on his grievances.

254. The Plaintiff, Dalen Drew Tanner, was a member of the CAF and held the rank of Master Corporal. He was an Infanteer posted to The Loyal Edmonton Regiment until released 29 July 2022 under a 5(f) category. He lives in Gibbons, Alberta. He served honourably for over 15 years. Mr. Tanner did not receive any COVID-19 injections and has established natural immunity from infection. When he expressed his objections to mandatory objections, he was sent for a mental health assessment. The CoC harassed members about wearing masks even during meal breaks. He applied for a religious accommodation and was denied. He was being assessed for a medical release though the CoC was pushing for a 5(f) release under the Directives. The CoC requested that he be reduced in rank upon release. He has been struggling with adapting to civilian life and his health since his release.

255. The Plaintiff, Justin Myles Tenhage, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted to Argyll & Sutherland Highlanders until 16 February 2022 under a 4(c) voluntary release. He lives in Wellandport, Ontario. He has served honourably for over 7 years. Mr. Tenhage did not receive any COVID-19 injections. Mr. Tenhage's name and medical status were openly discussed within a WhatsApp group for platoon leadership. He applied for a religious accommodation and was denied with no written reasons. Upon submitting a grievance, the CoC threatened to immediately begin RM if he did not request a voluntary release. He was handed his Veteran's ID

card at a social function several months after his release. Mr. Tenhage has not received any final returns on his grievances.

256. The Plaintiff, Jacob Cyril Theriault, is a member of the CAF and holds the rank of Corporal. He is a Signals Intelligence Specialist posted to Canadian Forces Station Leitrim. He lives in Vars, Ontario. He has served honourably for over 5 years. Cpl. Theriault did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was under RM for a 5(f) release but was retained under Directive 003. Cpl. Theriault has not received any final returns on his grievances.

257. The Plaintiff, Simon Bobby H. Tilly, was a member of the CAF and held the rank of Corporal. He was an Infanteer posted to The Black Watch (Royal Highland Regiment) of Canada in Montreal until April 2022 when he had a voluntary release. He lives in Saint Adele, Quebec. He has served honourably for over 5 years. Mr. Tilly received one COVID-19 injection to avoid issues with his release. He developed cardiac symptoms and did not have a second dose. Upon hearing of the Directives, he submitted a request for a 4(c) voluntary release to avoid the administrative measures.

258. The Plaintiff, Jean-Philippe Trudel, was a member of the CAF and held the rank of Corporal. He was an Aviation Systems Technician with 3 Air Maintenance Squadron posted to CFB Bagotville until he was released on 16 June 2022 under a 5(f) category. He lives in La Baie, Quebec. He served honourably for over 15 years. Mr. Trudel did not receive any COVID-19 injections. He applied twice for a *CHRA* accommodation and was denied both times.

259. The Plaintiff, Albert Jason Tschetter, is a member of the CAF and holds the rank of Corporal. He is an Infanteer with 1PPCLI posted to CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 14 years. Cpl. Tschetter did not receive any COVID-19 injections and has established natural immunity from infection. He was put on work-from-home and then had no communication for months with the CoC. He applied for a religious accommodation though never had an interview with a Chaplain; his request was denied by review board rather by his CoC. The RM did not complete, and he

received a phone call from the CoC after Directive 003 was issued to return to work. Cpl. Tschetter has not received any final returns on his grievances.

260. The Plaintiff, Shelley Diane Tully, is a member of the CAF and holds the rank of Corporal. She is a Material Management Technician with 2<sup>nd</sup> Royal Canadian Regiment posted to CFB Gagetown. She lives in Oromocto, New Brunswick. She has served honourably for over 9 years. Cpl. Tully received two NOVAVAX COVID-19 injections. She applied for a medical due to known rare vascular disease accommodation and was denied without written reasons which the CoC could not provide despite several requests. When she enquired with civilian health care providers, they had not been contacted by CAF for her medical records. She did not grieve the decision as she felt defeated by the process and lack of support from her CoC.

261. The Plaintiff, Magali Turpin, is a member of the CAF and holds the rank of Corporal. She is a Signal Operator with 2<sup>nd</sup> Royal Canadian Regiment posted to CFB Gagetown. She lives in Oromocto, New Brunswick. She has served honourably for over 7 years. Cpl. Turpin did not receive any COVID-19 injections and has established natural immunity from infection. Months before the Directives, members were being threatened with removal of pay and career consequences if they did not get the COVID-a9 injections. Banned from social functions, she was allowed to attend annual briefings with approximately 500 people crowded into a hallway. She applied for a *CHRA* accommodation and was denied. The military doctor could not answer her questions about the COVID-19 injections and the impact on women's health. Her work after the accommodation was denied was closely monitored by her CoC to the point of harassment. The harassment and being assigned tasks outside her trade continued after Directive 003 and she was retained. It improved with a change in the CoC. Cpl. Turpin has not received any final returns on her grievances.

262. The Plaintiff, Julian Philip Tutino, was a member of the CAF and held the rank of Corporal. He was an Aircraft Structures Technician with 436(T) Squadron 8 Wing at CFB Trenton until he was released 25 July 2022 under a 5(f) category. He lives in Trenton, Ontario. He served honourably for over 12 years. Mr. Tutino



did not receive any COVID-19 injections and has established natural immunity from infection. Upon being sent home after testing positive for COVID-19, he was told by the Master Warrant Officer that he would never easily find work again unless he was vaccinated. Special rules for the unvaccinated including wearing N95 masks and testing 3 times per week with results posted into MM for all to see. These measures were not required by vaccinated members. He applied for a *CHRA* accommodation and was denied. Within one week of receiving his release date, he was told to vacate his military housing even though he would not be released for another 7 weeks.

263. The Plaintiff, Gregory Vincent-Walker, was a member of the CAF and held the rank of Sergeant. He was an Infanteer posted to 1852-2<sup>nd</sup> Battalion Royal 22<sup>nd</sup> Regiment until releasing in May 2023. He lives in Quebec City, Quebec. He served honourably for over 20 years. He released under a 4(a) category having completed his 20-year Terms of Service. Mr. Vincent-Walker did not receive any COVID-19 injections. He applied for a religious accommodation and was denied three months later. He was then prohibited from attending his workplace under penalty of disciplinary measures.

264. The Plaintiff, Cade Austin Walker, was a member of the CAF and held the rank of Corporal. He was a Military Police Officer posted at CFB Borden until releasing with a 4(c) voluntary category on 27 March 2023. This release category will allow him to have career options after release. He lives in Gibbons, Alberta. He served honourably for almost 4 years. Mr. Walker did not receive any COVID-19 injections.

~~265. The Plaintiff, Ashley Lynn Watson, was a member of the CAF and held the rank of Corporal. She was a Material Management Technician with 8 Wing posted to CFB Trenton until she was released on 14 October 2022 with a 4(c) voluntary release. She lives in Trenton, Ontario. She served honourably for over 5 years. Cpl. Watson received one COVID-19 injection to keep her position and has established natural immunity from infection. She was harassed to get a second dose while on sick leave. The CoC sent an email to everyone in the unit disclosing the vaccination status of everyone in the unit. She applied for a~~

~~religious accommodation and was denied. Ms. Watson has not received any final returns on her grievances.~~

266. The Plaintiff, Brennen Bo Anthony Watson, was a member of the CAF and held the rank of Corporal. He was a Cook posted to 003752 8 Air Communications and Control Squadron at CFB Trenton until June 2022. He lives in Trenton, Ontario. He served honourably for over 7 years. Mr. Watson received one COVID-19 injection. He then voluntarily released under a 4(c) category before being forced to have a second dose. On two occasions an email was sent to all members of his unit with a spreadsheet disclosing he refused the injections. Conversations were overheard using derogatory language about Mr. Watson. He applied for a religious accommodation and was denied. Mr. Watson is receiving treatment for his mental health since his release.

267. The Plaintiff, Benjamin Kyle Weston, is a member of the CAF and holds the rank of Corporal. He is a Combat Engineer with 41 Combat Engineer Regiment posted to CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 14 years. He did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. The return to duty following Directive 003 did not go well due to the negative environment with multiple discouraging and intimidating communications with the CoC. Cpl. Weston has applied for a 4(c) voluntary release.

268. The Plaintiff, Matthew Max Whicher, is a member of the CAF and holds the rank of Corporal. He is an Aviation Systems Technician with 1 Air Maintenance Squadron posted to CFB Cold Lake. He lives in Cold Lake, Alberta. He has served honourably for over 10 years. Cpl. Whicher received two COVID-19 injections to preserve an imminent career opportunity with the CAF.

269. The Plaintiff, Joshua James White, is a member of the CAF and holds the rank of Corporal. He is a Mobile Support Equipment Operator posted to CFB Edmonton. He lives in Gibbons, Alberta. He has served honourably for 7 years. Cpl. White did not receive any COVID-19 injections. He applied for a religious accommodation and was denied but he was not informed of the decision for almost 6 weeks. He was in the process of a medical release for a service-related

injury when the Directives were implemented. He was told the 5(f) release from the Directives would override his medical release. His RM were not completed, and he returned to work with Directive 003. The return to work has resulted in being shunned and a significant decline in his mental health. Cpl White has not received any final returns on his grievances.

270. The Plaintiff, Andrew Ernest Wilkowski, was a member of the CAF and held the rank of Sailor First Class. He was a Marine Engineer Technician posted to Canadian Fleet Pacific. He lives in Victoria, British Columbia. He served honourably for over 7 years. He released on 8 September 2022 under the 5(f) release category. Mr. Wilkowski did not receive any COVID-19 injections. He applied for a religious accommodation and was denied after significant struggles trying to obtain one. Members of his same faith and congregation were granted accommodations. RM were initiated weeks before the decision was given on his accommodation request. He sought out mental health supports before he was released and was told they could not help him. Mr. Wilkowski has not received any final returns on his grievances.

271. The Plaintiff, Donald James Williams, is a member of the CAF and holds the rank of Sergeant. He is an Infantry Pioneer with The Hastings and Prince Edward Regiment posted to CFB Trenton. He lives in Trenton, Ontario. He has served honourably for over 21 years. Sgt. Williams did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied.

272. The Plaintiff, Curtis Malcolm Wilson, was a member of the CAF and held the rank of Master Corporal. He was an Armoured Soldier posted to Windsor until he released on 24 March 2022 with a 4(c) voluntary release. He lives in Ottawa, Ontario. He served honourably for over 10 years. Mr. Wilson did not receive any COVID-19 injections. Prior to the Directives being issued, the CoC sent out an email listing the vaccine status of multiple CAF members. He applied for a *CHRA* accommodation and was denied.

273. The Plaintiff, Wade George Wilson, was a member of the CAF and holds the rank of Master Corporal. He is an Electronic Optronics Technician with

3PPCLI posted to CFB Edmonton until he was released under a 5(f) category on **3 August 2022**. He lives in Listowel, Ontario. He has served honourably for over 14 years. Mr. Wilson did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a medical accommodation and was denied. He applied for a religious accommodation and was denied by a review board. He was not assisted with a request for mental health service while still in the CAF. He has struggled with the transition to civilian life with none of the usual supports. Mr. Wilson has not received any final returns on his grievances.

274. The Plaintiff, Andrew Dean Wychnenka, is a member of the CAF and holds the rank of Captain. He is a Military Police Officer with 13 Military Police Platoon at CFB Winnipeg. He lives in Winnipeg, Manitoba. He has served honourably for over 17 years. He was told if he did not attest to his vaccination status, he could sign another pay sheet. His CoC told him the MM was probably a protected platform and that vaccination status was not considered medical information. Capt. Wychnenka did not receive any COVID-19 injections. He applied for a medical accommodation that was delayed for more than a year with referrals to specialists for possible contraindication to the COVID-19 injections. He was not allowed to work and lost significant income during this time. Directive 003 was issued, and he returned to duty but was required to do training that was not a fundamental requirement to his role. Capt. Wychnenka has not received any final returns on his grievances.

275. The Plaintiff, Marc Zorayan, is a member of the CAF and holds the rank of Sailor One. He is a Port Inspection Diver posted at Canadian Forces Recruiting Centre Montreal. He lives in Papineau, Quebec. He has served honourably for over 11 years. S1 Zorayan did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied.

276. The Plaintiff, Brandon Tyler Peter Zwicker, is a member of the CAF and holds the rank of Sergeant. He is a Military Police Officer with 1 Military Police Regiment posted to CFB Edmonton. He lives in Edmonton, Alberta. He has

served honourably for over 17 years. Sgt. Zwicker received ~~two~~-no COVID-19 injections after a long delay for a final decision on his release put him into financial uncertainty. He was asked to attend a meeting to discuss his transfer to the Transition Centre for a medical release and was instead told that RM would start for not being vaccinated. **He was denied the transfer to the Transition Centre as well as a return to origin posting pending his release for severe service injuries.** He had his Land Duty Allowance removed due to his vaccination status. Sgt. Zwicker has not received any final returns on his grievances.

277. The Plaintiff, William H.L. Levi Wall, is a member of the CAF and holds the rank of Corporal. He is a Vehicle Technician with 1 Canadian Mechanized Brigade Group Headquarters & Signals Squadron posted CFB Edmonton. He lives in Spruce Grove, Alberta. He has served honourably for over 6 years. Cpl. Wall did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He was threatened with LWOP. His Land Duty Allowance was removed, and he was blocked from any kind of collective training. He was required to test every two days. After months of uncertainty and expecting a 5(f) release while dealing with medical issues, he was retained under Directive 003.

278. The Plaintiff, Karen Page Nightingale, is a member of the CAF and holds the rank of Sergeant. She is a Cook posted to CFB Trenton. She lives in Trenton, Ontario. She has served honourably for over 16 years. Sgt. Nightingale received two NOVAVAX COVID-19 injections and has established natural immunity from infection. She has endured derogatory and belittling comments in the workplace. She became fearful of anyone finding out her status. She applied for a religious accommodation and was denied. She was not given the opportunity to provide additional information when the criteria were changed by the Chaplain General after she had one interview with the Wing Chaplain and Canadian NORAD Senior Chaplain who both supported the accommodation. She was told she would be denied her promotion unless she proceeded with her second dose.

279. The Plaintiff, Marc-Antione Poulin, was a member of the CAF and holds the rank of Sergeant. He is a Military Police Officer posted to Canadian Forces

Recruitment Centre Quebec until 23 May 2022 when he was released under category 5(f) following RM. He lives in Saint-George, Quebec. He has served honourably for over 11 years. Mr. Poulin did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. Mr. Poulin has not received any final returns on his grievances.

280. The Plaintiff, Keegan Marsh, is a member of the CAF and holds the rank of Master Corporal. He is an Armoured Crewman with the Base Orderly Room for 5 Canadian Division Support Group posted to CFB Gagetown. He lives in New Brunswick. He has served honourably for over 10 years. MCpl. Marsh did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. During a range training, the Captain acting as Range Safety Officer told all senior members actin as Assistant Range Safety Officers that the targets were antivaxxers trying to stop delivery of the vaccine. None of the officers present corrected the comment and some laughed it off. He was denied a new position in the Orderly Room as the Regimental Sergeant Major determined **MCpl Marsh** was a danger to pregnant soldiers. He helped plan the Soldiers Appreciation Dinner then was told the day before the event that he could not attend. At his home unit, he was isolated in an upstairs room by himself during a pizza party and was brought pizza to eat alone. He was unable to work in a civilian job due to RM and could not apply for the time away from the unit. This resulted in a loss of approximately \$20,000 in income. His vaccination status was widely known at his posting and at his home unit without him sharing the information except for MM.

281. The Plaintiff, Ryan Michael, was a member of the CAF and held the rank of Sergeant. He was an Infanteer with Canadian Forces Health Services Group Headquarters posted to Ottawa. He lives in Nepean, Ontario. He has served honourably for over 15 years. He recommended for a 5(f) release but applied for a 4(c) voluntary release which occurred on 15 March 2022. Mr. Ryan did not receive any COVID-19 injections. He was a Monitor Mass ("MM") expert and L2 Help Desk Non-Commissioned Officer (NCO) for this program nationwide. He submitted a privacy complaint to the Privacy Commissioner as he was fully

aware that this program has limited security measures, and access to private information is often given arbitrarily. He applied for a religious accommodation and was denied. Mr. Michael has not received any final returns on his grievances.

282. The Plaintiff, Thomas Patrick Hayes, was a member of the CAF and held the rank of Corporal. He was an Armoured Soldier posted to the Royal Canadian Artillery Corps School until he was released on 4 August 2022 with a category 5(f). He lives in Irma, Alberta. He has served honourably for over 14 years. Mr. Hayes did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied three months after RM had commenced. He was relegated to shop duties and worked and ate in areas separate from the vaccinated. He was then told to only come in when he was called. He had to test 3 times per week.

283. The Plaintiff, James Mark Charlebois, is a member of the CAF and holds the rank of Captain. He is a Cadet Officer with the Cadet Instructor Cadre posted at 2799 Army Cadets. He lives in Bradford, Ontario. He has served honourably in PPCLI, Queens Own Rifles and Cadet Instructor Cadre for over 10 years. Capt Charlebois did not receive any COVID-19 injections. After RM and expecting a 5(f) release, he was recalled to duty after Directive 003 was issued.

284. The Plaintiff, Halston Randal Nicholson, was a member of the CAF and held the rank of Bombadier. He is a Gunner with 1 Royal Canadian Horse Artillery until he was released under a 5(f) release on 21 July 2022 for not disclosing his vaccination status. He lives in Calgary, Alberta. He served honourably for over 9 years. Mr. Nicholson received two COVID-19 injections and has established natural immunity from infection. He applied for a *CHRA* accommodation and was denied. He has not received any final returns on his grievances.

285. The Plaintiff, Melissa-Jane Sarah Krieger, was a member of the CAF and held the rank of Master Corporal. She was a Line System Technician posted to 2 Canadian Mechanized Brigade Group Headquarters and Signals Squadron. She lives in Petawawa, Ontario. She served honourably for over 13 years. Ms.

Krieger did not receive any COVID-19 injections and has established natural immunity from infection. She applied for a religious accommodation and was denied. She was pulled from meal lines and not allowed in her work truck. Allowed to go to work, however, banned from social events with the same members. When she questioned the wording on a Unit Level Administrative Review because it did not accurately describe her or her work, she was told the form was templated with generic phrases about lack of trust and being an administrative burden. Her CO told her that a 5(f) was a dishonourable discharge and she should do a voluntary release. She was released with a 5(f) on 24 July 2022. She was not told of any loss of benefits for her move out of the Private Married Quarters; however, she did not receive reimbursement of her expenses.

286. The Plaintiff, Gianluca Luchetta, was a member of the CAF and held the rank of Officer Cadet. He was an Aerospace Control Officer Cadet posted to the Royal Military College until he was released on 6 July 2022 under the 5(f) category. He lives in Oshawa, Ontario. He has served honourably for over 4 years. Mr. Luchetta did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He has not received any final returns on his grievances.

287. The Plaintiff, Benjamin James Wilcox, was a member of the CAF and held the rank of Corporal. He was an Aviation Systems Technician posted to 8 Air Maintenance Squadron 8 Wing at CFB Trenton until he was released on 13 April 2022 under a 5(f) category. He requested a voluntary release, but this was denied. He lives in Frankford, Ontario. He served honourably for over 19 years. Mr. Wilcox did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He was charged 7 days before his release with a Summary Trial scheduled the day before his release. The conviction was overturned and removed from his record 7 months later. Grievance on charges and release was then denied on 28 November 2022.

288. The Plaintiff, Mark Ronkin, was a member of the CAF and held the rank of Corporal. He was a Combat Engineer with 1 Combat Engineer Regiment posted to CFB Edmonton until 22 April 2022 when he was released under a 5(f)



category. He lives in Legal, Alberta. He served honourably for over 5 years. Mr. Ronkin did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. Was on a course at CFB Gagetown and was threatened to leave him there is not vaccinated to fly home. Suffered broken leg and threat to release him before it healed so he would have no health care or benefits while it healed. CoC advised him to seek employment outside the CAF then would move his release date by a week thereby denying him the opportunity.

289. The Plaintiff, Serge Joseph Leo Faucher, was a member of the CAF and held the rank of Major. He was an Aerospace Engineering Officer posted to the Chief of Air Force Staff. He lives in Greely, Ontario. He has served honourably for over 39 years with a decorated and storied career. Mr. Faucher did not receive any COVID-19 injections and has established natural immunity from infection. He refused to enter his private medical information into MM and it was entered for him without his knowledge or consent. After Directive 001 was implemented, he asked to be released on a voluntary release within 30 days to avoid LWOP and RM. This earlier than planned retirement came at the cost of a promotion to Lieutenant Colonel and new opportunities with the newly created 3 Canadian Air Division (Space).

290. The Plaintiff, Jacob Thomas Fidor, was a member of the CAF and holds the rank of Corporal. He was a Line Technician posted to 2 Canadian Mechanized Brigade Group and Signal Squadron at CFB Petawawa. He lives in Petawawa, Ontario. He served honourably for over 9 years. Mr. Fidor did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He applied for another accommodation under other human rights codes and was denied. The unvaccinated members in his unit were told they were a threat so needed to be segregated and isolated. The CO told him that a 5(f) was a dishonourable discharge. Mr. Fidor released under a 4(c) voluntary release after securing civilian employment not requiring vaccination.

291. The Plaintiff, Lucas Gerard Ziegelbauer, was a member of the CAF and held the rank of Corporal. He was an Aviation Systems Technician with 400

Tactical Helicopter Squadron posted to CFB Borden until he released under a 4(c) voluntary release on 14 February 2022. He lives in Comanda, Ontario. He served honourably for over 12 years. Mr. Ziegelbauer did not receive any COVID-19 injections and has established natural immunity from infection. While on PATA, he was contacted by the CoC for his vaccination status which he declined to answer as it was protected medical information. He applied for a religious accommodation and was denied.

292. The Plaintiff, Spencer Daniel Lord, was a member of the CAF and held the rank of Corporal. He was an Infanteer with 2 Royal Canadian Regiment posted to CFB Gagetown until he was released under a 5(f) category on 23 May 2022. He lives in Bronson Settlement, New Brunswick. He served honourably for over 8 years. Mr. Lord did not receive any COVID-19 injections. He was asked rapid test results in front of his entire platoon by the CoC. He was reprimanded in front of the entire Company for not wearing a mask after the requirement for one had been dropped and no others were required to wear one. The Company Sergeant Major asked him every day to get the COVID-19 Injections. His mental health and financial security have been greatly impacted by his unexpected release from the CAF so early in his career.

293. The Plaintiff, Ian Ocegüera, was a member of the CAF and held the rank of Captain. He was an Artillery Officer posted to 3 Canadian Division Training Centre until 31 March 2022. He lives in Burns Lake, British Columbia. He served honourably for over 10 years. Mr. Ocegüera did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He terminated his Class B employment on the same day as the RM were being accelerated. He lost 2 years of income from that employment and was only 1 year from a Regular Force pension model with many years of service left. Mr. Ocegüera has not received final returns on his grievances.

294. The Plaintiff, John Nesrallah, was a member of the CAF and held the rank of Corporal. He was a Signals Intelligence Specialist posted to 1 Squadron CF Station Leitrim until he was released with a 5(f) category on 25 July 2022. He lives in Ottawa, Ontario. He served honourably for over 12 years. Mr. Nesrallah

did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a religious accommodation and was denied. He is concerned about medical coverage for service-related injuries given the shortage of family physicians in Ontario. Mr. Nesrallah has not received any final returns on his grievances.

295. The Plaintiff, Daniel Ninian Rodrigues, is a member of the CAF and holds the rank of Corporal. He is a Human Resources Administrator posted to Canadian Forces Network Operations Centre in Ottawa. He lives in Ottawa, Ontario. He has served honourably for over 6 years. Cpl. Rodrigues did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He has suffered from mental and physical injuries which have impacted his health during the Directives enforcement. Cpl. Rodrigues has not received any final returns on his grievances.

296. The Plaintiff, Cory Jason Kruger, was a member of the CAF and held the rank of Corporal. He was a Human Resources Administrator posted to 1 Canadian Field Hospital Det Ottawa until he released on a 4(c) category on 31 May 2022 after six months of extreme duress to continue to serve. He lives in Pakenham, Ontario. He served honourably for over 8 years. Mr. Kruger did not receive any COVID-19 injections He applied for a religious accommodation and was denied.

297. The Plaintiff, Stephen Young Smith, was a member of the CAF and held the rank of Corporal. He was a Combat Engineer with 1 Combat Engineers posted to CFB Edmonton until he was released on 13 July 2022 under a category 5(f). He lives in Spruce Grove, Alberta. He served honourably for over 12 years. Mr. Smith did not receive any COVID-19 injections. The status of members was exposed by the CoC on a regular basis. Mr. Smith was required to come in to do his attestation and COVID-19 education while on PATA. The pressure to keep his career to support his young family was immense. He was only required to rapid test to enter his unit and none of the others on Base. He applied for a religious accommodation with only 24 hours to complete the form and was denied by a review board.

298. The Plaintiff, Fourat Yacoub Yousif Jajou, was a member of the CAF and held the rank of Corporal. He was a Combat Engineer with Royal Hamilton Light Infantry. At the time the Directives were issued, he was arranging to transfer to the Royal Canadian Navy to become a Marine Mechanic. He lives in Niagara Falls, Ontario. He served honourably for over 12 years. Mr. Jajou did not receive any COVID-19 injections and has established natural immunity from infection. He applied for a medical accommodation due to an adverse reaction to influenza vaccine and was denied. He believed that a 5(f) would result in a criminal record affecting his ability to work and travel to the United States for necessary medical treatment from service-related injuries. He requested a voluntary release as instructed by his Warrant Officer. His release instead became a 5(f) and he was released on 17 May 2022.
299. The Plaintiff, Anthony Bilodeau, was a member of the CAF and held the rank of Master Corporal. He was an Infanteer with 1<sup>st</sup> Battalion Royal 22<sup>nd</sup> Regiment. He lives in Sant-Brigitte-de-Laval, Quebec. He served honourably for over 9 years. Mr. Bilodeau received two COVID-19 injections to preserve his income for his family. Vaccination status for every member of his Battalion were circulated on spreadsheets with no control to access. Working conditions had deteriorated to the point that he chose to voluntarily release on 6 September 2022 instead of serving the full 25 years he had planned to save his mental and physical health.
300. The Plaintiff, Jonathan Michael Recoskie, is a member of the CAF and holds the rank of Lieutenant. He is an Infantry Officer with 1PPCLI posted to CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 8 years. Lt. Recoskie did not receive any COVID-19 injections. He was put on work-from-home with no tasks and no access to CAF networks to complete other tasks. He applied for a religious accommodation and was denied. He lost Land Duty Allowance which reduced his income. His expected promotion in rank was delayed. He applied for a *CHRA* accommodation and was denied. Both denials were on the basis that COVID-19 injections were safe and effective.

301. The Plaintiff, Thomas L. Edwards, is a member of the CAF and holds the rank of Master Corporal. He is a Geomatics Technician posted to Mapping and Charting Establishment CFB Ottawa-Gatineau. He lives in Gloucester, Ontario. He has served honourably for over 13 years. MCpl. Edwards received two COVID-19 injections. He was undergoing evaluation for a medical release and considered it in jeopardy if not compliant with Directives. He also did not want risk losing his career.
302. The Plaintiff, Lindsay Anne Mackenzie, is a member of the CAF and holds the rank of Corporal. She is a Human Resources Administrator posted to 440 Transport Squadron. She lives in Yellowknife, Northwest Territories. She has served honourably for over 14 years. Cpl. MacKenzie did not receive any COVID-19 injections. She confirms that vaccination status was saved on an Excel spreadsheet on a common drive which was not secure for protected information. She was treated as an outcast for work and social functions. She applied for a religious accommodation while on MATA and was denied. RM were commenced but stopped with Directive 003 and she was to return to duty. She has applied for a 4(c) voluntary release. Cpl. MacKenzie has not received any final returns on her grievances.
303. The Plaintiff, Sarah Evelyn Laprade, is a member of the CAF and holds the rank of Master Corporal. She is a Human Resources Administrator posted to 5 Canadian Division Support Brigade Det Aldershot. She lives in Kentville, Nova Scotia. She has served honourably for over 6 years. MCpl Laprade did not receive any COVID-19 injections. She was openly disparaged by other members with no action taken by the CoC. Boxes of rapid tests were left on her desk when only the unvaccinated were to test. Names of unvaccinated members were leaked in an email that was printed off and distributed. She was told by an officer that a directive from Division was that no member was to be accommodated. MCpl Laprade continued to work and teach multiple first aid classes. She was removed from doing security clearances because the CoC thought she might become vindictive. She applied for a religious accommodation and was denied.

304. The Plaintiff, Dany Pilon, was a member of the CAF and held the rank of Master Corporal. He was a Material Management Technician posted to Royal Canadian Electrical and Mechanical Engineer School as an Instructor until he was released under a 5(f) category on 30 May 2022. He lives in Sainte-Anne-Des-Monts, Quebec. He served honourably for over 13 years. Mr. Pilon did not receive any COVID-19 injections. He was on PATA when the Directives were issued and was forced to remain home to answer phone calls during this leave. During an O group meeting, his supervisor asked him his plan for vaccination, and he replied that he would take leave. The response from his supervisor in front of the others was that Mr. Pilon should go to jail for being unvaccinated. There were no consequences for speaking like this to a subordinate. During his release medical and dental appointments his voiced health concerns were mocked and discounted. He applied for a *CHRA* accommodation and was denied.
305. The Plaintiff, James Andrew Cook, is a member of the CAF and holds the rank of Captain. He is an Aerospace Control Officer in training posted to CFB Winnipeg. He lives in St. Francois Xavier, Manitoba. He has served honourably for over 17 years. Capt. Cook received two COVID-19 injections and experienced adverse events following both doses. He refused to attest to his vaccine status when the Directives were issued. He was told no exemption existed for the attestation. He was threatened with charges which never materialized. He was removed from a career course with only a few weeks to go. RM were instigated despite his CoC knowing his vaccination status. He returned to duty with Directive 003.
306. The Plaintiff, Derek John Gauthier, is a member of the CAF and holds the rank of Corporal. He is a Combat Engineer posted to Canadian Engineer Regiment Det Rouyn. He lives in Rouyn-Noranda, Quebec. He has served honourably for over 6 years. Months before the Directives, the CoC required two doses of COVID-19 injections, or the member would receive a dishonourable discharge. Cpl. Gauthier submitted for a voluntary release due to family history of cardiac issues and stroke. After Directive 003, he sought to cancel this release

and return to duty. His CoC told him that there had been a new Directive issued that brought punitive measures for Cpl. Gauthier on his return. Cpl. Gauthier eventually received two COVID-19 injections so he could work to support his family. He suffered cardiac and neurological adverse events after both doses which matched his family history of these medical issues. He later returned to duty without these alleged punitive measures.

307. The Plaintiff, David Adam Dobbie, is a member of the CAF and holds the rank of Corporal. He is an Infanteer posted to The Hastings and Prince Edward Regiment. He lives in Lakefield, Ontario. He has served honourably for over 21 years. Cpl Dobbie did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He has experienced significant bullying and harassment from his CoC, primarily from his CO, to have him released even though his skill set is in high demand by the Regiment. Cpl. Dobbie has serious service-related injuries and is seeking a medical release under a 3(b) category which is not supported by his CoC who has actively sought to have him released under categories which would leave him without supports and benefits.

308. The Plaintiff, Gabrielle Charpentier, was a member of the CAF and held the rank of Sailor One. She was a Human Resources Administrator posted at CFB Valcartier. On 6 June 2022 she voluntarily released due to her vaccination status. She lives in Shannon, Quebec. She served honourably for 6 years. Ms. Charpentier did not receive any COVID-19 injections. When the Directives were issued, she went on unpaid leave to pursue her studies rather than face a 5(f) release. She experienced several incidents of attention being called to her because of her vaccination status and derogatory comments being made.

309. The Plaintiff, Daniel Johannes Reckman, was a member of the CAF and held the rank of Master Corporal. He was an Armoured Crewman posted to the 1<sup>st</sup> Hussars until he released under a 4(c) voluntary release to avoid negative consequences from a 5(f) release for his future. He lives in Wyoming, Ontario. He served honourably for over 14 years. He was due for his Canadian Forces Decoration three years ago but has never received it. Mr. Reckman did not

receive any COVID-19 injections. He deployed to work in long-term care homes at the height of COVID-19. He applied for a religious accommodation and was denied. This denial was not a surprise as he had been told by the CoC that all requests were being denied regardless of merit. Financial circumstances required that he take his pension as a lump sum and there was a loss of approximately 35% of its value in the 5 months it took to receive it.

310. The Plaintiff, Zachary Cleeland, was a member of the CAF and held the rank of Corporal. He was a Medical Technician posted at 1 Field Ambulance at CFB Edmonton. He lives in Legal, Alberta. He served honourably for over 6 years. Mr. Cleeland did not receive any COVID-19 injections and has established natural immunity from infection. Upon investigation, he discovered that over 800 members could view his medical information uploaded to MM. As a medical technician, Mr. Cleeland was trained to obtain informed consent before any medical treatment, procedure or medication and consent cannot be given under duress. The Directives threatened extreme financial and social loss which vitiated consent. He was given extended Terms of Service and few months later was released under a 5(f) category. Mr. Cleeland has not received any final returns on his grievances.

311. The Plaintiff, Mateusz Cameron Kowalski, is a member of the CAF and holds the rank of Corporal. He is an Armoured Crewman posted to Fort Garry Horse. He lives in East St. Paul, Manitoba. He has served honourably for over 3 years. Mr. Kowalski did not receive any COVID-19 injections. He was told by his CoC that he would be fired and dishonourably discharged for not taking COVID-19 injections. He was told not to report to work and was ostracized by his CoC and fellow members which left him unemployed with no income for 10 months. He used his savings and then his mental health began to deteriorate, and he was not coping. When Mr. Kowalski came in for a meeting with his CoC, he was told to voluntarily release or be dishonourably discharged. He wrote his request for release at that meeting. He did not apply for a religious accommodation after the Padre told him no religious accommodations were approved. He remains



uncertain of his status with the CAF as he has not received any notification about his release or a return to duty.

312. The Plaintiff, Tara J. MacDonald, was a member of the CAF and held the rank of Corporal. She was a Human Resources Administrator with 450 Tactical Helicopter Squadron posted at CFB Petawawa until she released with a medical release 3(b) on 5 December 2022. She lives in Pembroke, Ontario. She served honourably for over 15 years. Ms. MacDonald did not receive any COVID-19 injections. She was required to rapid tests in front of a member of the CoC even when working from home which she found humiliating and degrading. Her supervisor frequently made comments about her vaccination status where others could hear him. She applied for a religious accommodation and was denied.
313. The Plaintiff, Paul David Wilson, was a member of the CAF and held the rank of Corporal. He was an Avionics Systems Technician posted to CFB Petawawa until he was released under a 5(f) category on 28 June 2022. He lives in North York, Ontario. He has honourably for over 8 years. Mr. Wilson did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. There has been a large drop in salary for him in civilian employment. Mr. Wilson has not received any final returns on his grievances.
314. The Plaintiff, Brendan V.T. Lebert, was a member of the CAF and held the rank of Bombardier. He was a Gunner posted to 3 Canadian Division Training Centre at CFB Wainwright. He lives in Calgary, Alberta. He served honourably for over 3 years. He was deployed during the early days of COVID-19 to assist with care. He was continually harassed to accept vaccination for a period of approximately 1 year and was told he would be dishonourably discharged. Mr. Lebert received one COVID-19 injection and had cardiac and fatigue adverse events. To avoid a second dose, he chose to take Exempt Duty & Training. He returned to duty while the Directives still required two doses. He requested a voluntary release with a date that would not cause him to receive a 5(f) category. His CoC would not allow it so he took a second dose before he released with a 4(c) a few weeks later.

315. The Plaintiff, Jocelyn Lamotte, was a member of the CAF and held the rank of Warrant Officer. He was a Logistics Planner posted at 2 Canadian Ranger Patrol Group Montreal until he was released under a 3(b) category on 1 March 2022. He lives in Saint-Lazare, Quebec. He has served honourably for over 29 years. Mr. Lamotte did not receive any COVID-19 injections. He received RM until his file was reviewed for service-related injuries.
316. The Plaintiff, Anthony J. Duke, was a member of the CAF and held the rank of Master Corporal. He was an Infanteer posted at Royal Regina Rifles. He lives in Regina, Saskatchewan. He has served honourably for over 12 years. Mr. Duke received one COVID-19 injection to keep his full-time employment with the CAF. He resigned his full-time Class B contract in the summer of 2022. He then applied for a voluntary release effective 22 December 2023. He was told by his CoC that he would not be able to support his newborn daughter because he would be kicked out of Army. He was restricted to Orderly room for clerical work after the Directives were implemented. He applied for a religious accommodation and was denied.
317. The Plaintiff, Riley Malcom MacPherson, was a member of the CAF and holds the rank of Aviator. He was an Avionics Systems Technician with 407 Long Range Patrol Squadron posted to CFB Comox until he was released on 18 February 2022 under a category 5(f). He lives in Vancouver, British Columbia. He served honourably for over 3 years. Mr. MacPherson did not receive any COVID-19 injections. He applied twice *CHRA* accommodation and was denied. The second time was after diagnosis with mental health conditions. He was commenced on RM before received a decision on the accommodation requests. He was told by the CoC that a 5(f) was a dishonourable release. He was returned to his Unit with \$53 reimbursement and 6 days of his leave after driving across the country. Mr. MacPherson has not received any final returns on his grievances.
318. The Plaintiff, Kim Noel Lauzon, was a member of the CAF and holds the rank of Corporal. He was an Air Weapons Systems Technician posted Canadian Forces School of Aerospace Technology and Engineering at CFB Borden until

she was released on 30 May 2022. He lives in La Crete, Alberta. He has served honourably for over 9 years. Mr. Lauzon did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. His promotion was denied due to vaccination status. He believed that he would be on LWOP while receiving RM but he continued coming into work with rapid testing 3 times per week. Upon his return from bereavement leave, he was given a month's notice of his 5(f) release. He was not reimbursed for expenses related to attending the funeral. He was not provided with needed supports by the Transition Centre to assist him with his release.

319. The Plaintiff, Kurtis Rockefeller Rutherford, was a member of the CAF and held the rank of Master Corporal. He was an Infanteer with 2 Royal Canadian Regiment posted CFB Gagetown until October 2021 when he was released under a 3(b) medical category. He lives in Smithville, Ontario. He served honourably for over 7 years. Mr. Rutherford received two COVID-19 injections and was hospitalized for an adverse reaction. His life changing neurological injuries were attributed to his service due to the requirement for him to have the injections to continue his career.

320. The Plaintiff, Sergiu George Candea, was a member of the CAF and held the rank of Corporal. He was a Combat Engineer with 1 Combat Engineer Regiment posted to CFB Edmonton until he was released under a 5(f) category. He lives in Edmonton, Alberta. He served honourably for over 5 years. Mr. Candea did not receive any COVID-19 injections and has established natural immunity from infection. He was ordered to carry his vaccination booklet with him on Base and show to anyone on request. He applied for a *CHRA* accommodation and was denied three months later. RM were commenced almost two months before the accommodation request decision was given. He has struggled with his mental health since his release. The employment he was able to find does not provide a comparable salary and benefits.

321. The Plaintiff, Jesse Henry Field, is a member of the CAF and holds the rank of Corporal. He was a Combat Engineer with 1 Combat Engineer Regiment posted to CFB Edmonton then posted to 408 Tactical Helicopter Squadron at

CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 7 years. Cpl. Field received two COVID-19 injections and has established natural immunity from infection. Threats of RM and shaming were present in the Regiment for months before the Directives. During vaccination parades before the Directives, he chose not to have injections. His CoC assumed he was vaccinated. When he was not, he was threatened with charges for lying. Other members were demeaning and harassing long with his CoC which encouraged the behaviour. He was assigned demeaning tasks requiring overtime. He was threatened to lose a posting he had prepared for over his entire career. He applied for an accommodation 3 times and was denied.

322. The Plaintiff, William Edward Brendon, is a member of the CAF and holds the rank of Corporal. He is a Vehicle Technician with 1 Canadian Mechanized Brigade Group posted to CFB Edmonton. He lives in Edmonton, Alberta. He has served honourably for over 8 years. Cpl. Brendon did not receive any COVID-19 injections. He has experienced lost paperwork, indecisiveness at the higher levels of leadership and mistreatment. RM were commenced before his accommodation request was submitted. He applied for a *Charter* rights accommodation and was denied by the review board. He was notified of an impending 5(f) release and after more than 8 months of delay, was retained under Directive 003. Cpl. Brendon has not received any final returns on his grievances.

323. The Plaintiff, Cameron Samuel Nobert, is a member of the CAF and holds the rank of Corporal. He is an Infanteer with 2PPCLI posted to CFB Shilo. He lives in Shilo, Manitoba. He has served honourably for over 9 years. Cpl. Nobert received one COVID-19 injection and suffered adverse effects. He was told to have the second dose. RM continued and he was to have a 5(f) release but was retained under Directive 003. He is expecting a 3(b) release for service-related injuries before the Directives but will release at the end of his Terms of Service in 2024 if this has not occurred. He did not apply a medical accommodation as he saw the outcome of being denied as foregone conclusion.

324. The Plaintiff, David Houde, was a member of the CAF and held the rank of Corporal. He was a Mobile Support Equipment Operator with 1 Service Battalion posted to CFB Edmonton until he was released under a 3(b) category on 24 February 2023. He lives in Edmonton, Alberta. He served honourably for 9 years. Mr. Houde did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He experienced several issues with his CoC which led to mental health issues, including suicidal ideation, requiring his release. Mr. Houde has not received any final returns on his grievances.
325. The Plaintiff, Alyssa Joy Blatkewicz, is a member of the CAF and holds the rank of Corporal. She is a Human Resources Administrator posted to the Transition Centre at CFB Edmonton. She lives in Edmonton, Alberta. She has served honourably for over 6 years. Cpl. Blatkewicz received two COVID-19 injections under duress. She was concerned about reproductive health issues with vaccination. She applied for a religious accommodation and was denied due to her faith not having explicit provisions or practices. Her request for a medical accommodation for pregnancy risks was denied. The Base Surgeon contacted her civilian pregnancy specialist without her consent to discuss her high-risk pregnancy and medical history. She was denied the recommended medical leave for her pregnancy. She was told the CAF like to keep pregnant members working as long as possible. She was also denied medical leave for mental health issues.
326. The Plaintiff, Colin Perry Kaiser, was a member of the CAF and held the rank of Master Sailor. He was a Marine Technician posted to the Naval Fleet School (Atlantic) at CFB Halifax until he was released under a 5(f) category on 5 July 2022. He lives in Dartmouth, Nova Scotia. He has served honourably for over 12 years. Mr. Kaiser did not receive any COVID-19 injections. He was told only the Moderna doses would be acceptable. He had witnessed a colleague have a stroke 1 day after receiving Moderna and had concerns about safety. He was shown the template for 5(f) release recommendations. His release recommendations included initials that were from another member. He was told his mental health claim is being delayed because it was wrongfully attributed to

only the COVID-related period. Mr. Kaiser has not received any final returns on his grievances.

327. The Plaintiff, Fabrice Dourlent, was a member of the CAF and held the rank of Second Lieutenant. He was a Pilot (Student) posted to CFB Moose Jaw until he was released under a 5(f) category on 24 April 2023. He lives in Moose Jaw, Saskatchewan. He served honourably for over 7 years. He experienced a long period of harassment and allegations of wrongful behaviour that led to 7 charges. He was acquitted on 5 of the charges after showing evidence at the Summary Hearings of the actions of his CoC. One charge was dropped. He and his family had several incidents of being harassed at their residence on the pretext of wellness checks. Mr. Dourlent did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He applied for a *CHRA* accommodation and was denied. Mr. Dourlent has not received any final returns on his grievances.

328. The Plaintiff, Cory Lance Gargin, was a member of the CAF and held the rank of Sergeant. He was an Aviation Systems Technician posted to 406 Maritime Operational Training Squadron at CFB Shearwater until he was released under a 5(f) category on 19 January 2022. He lives in Halifax, Nova Scotia. He served honourably for over 18 years. Mr. Gargin did not receive any COVID-19 injections. He expressed concerns about adverse reactions to other vaccines, but these were dismissed. He applied for a religious accommodation and was denied. He has had to take a pension payout to support his family since his release. Mr. Gargin has not received any final returns on his grievances.

329. The Plaintiff, Anita Grace Hessling, was a member of the CAF and held the rank of Master Corporal. She is a Military Police Officer with 1 Military Police Shilo Platoon posted at CFB Shilo until she was released under a 5(a) category on 19 October 2022 for service-related injuries. She lives in Carberry, Manitoba. She has served honourably for over 17 years. Ms. Hessling did not receive any COVID-19 injections. The MP Regiment issued their own Directive on COVID-19 vaccination. She applied for a religious accommodation and was denied. Her CoC contacted her to ask her if she had mental health issues, which she denied.

She was under RM and a 5(d) release was recommended by her CoC. Ms. Hessling has not received any final returns on her grievances.

330. The Plaintiff, Jennifer Bethany Frizzley, is a member of the CAF and holds the rank of Sailor Third Class. She is a Boatswain posted to NMCS CABOT. She lives in Victoria, BC. She has served honourably for over 2 years. S3 Frizzley did not receive any COVID-19 injections. She applied for a religious accommodation and was denied over the phone. Her memo, unredacted, was given to another member to use as a template without her consent. She has experienced confusing and inconsistent information from her CoC on her status and her requests for transfers are being held with no determination date given. S3 Frizzley has not received any final returns on her grievances.

331. The Plaintiff, David Andrew Benson, was a member of the CAF and held the rank of Petty officer Second Class. He was a Marine Technician posted to CFB Esquimalt until he was released on 27 July 2022 under category 5(f). He lives in Victoria, British Columbia. He served honourably for over 18 years. Mr. Benson did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He was ordered to complete career courses online but was denied access to the technology and accounts to do this task. He was required to submit a daily wellness check by email. All suggestions he offered to continue to work were denied. Mr. Benson has not received any final returns on his grievances.

332. The Plaintiff, Brandon John Armstrong, was a member of the CAF and held the rank of Master Corporal. He was a Combat Engineer posted at Princess of Wales Own Regiment until he was released on 31 March 2022 under a 5(f) category. He lives in Aylmer, Ontario. He served honourably for over 15 years. Mr. Armstrong did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. The CoC exerted pressure to vaccinate, including referring to his ability to care and support for his children during a meeting that became an interrogation. His Class B contract was not extended. His desk at HMCS ONTARIO was searched while he was not present.

333. The Plaintiff, Rejean Berube, was a member of the CAF and held the rank of Sergeant. He was a Medical Technician posted at Military Personal Command in Ottawa until he was released on 24 July 2022 under a 5(f) category. He lives in Pointe-Aux-Trembles, Quebec. He served honourably for over 29 years. Mr. Berube did not receive any COVID-19 injections. He applied for a religious accommodation and was denied. He requested a medical release as he was recovering from surgery but was denied.
334. The Plaintiff, Jean-Philippe Joseph Bouchard, is a member of the CAF and holds the rank of Master Corporal. He is a Mobile Support Equipment Operator posted to CFB Comox. He lives in Courtenay, British Columbia. He has served honourably for over 13 years. MCpl. Bouchard received two COVID-19 injections to save his career and suffered adverse effects after the second dose. Military doctors openly laugh and/or dismiss any connection to the vaccinations. His Base now requires 3 doses to deploy. Fellow members seemingly vanished from Base with none of the usual farewells such a Depart with Dignity. The CO of CFB Comox at several events prior to the Directives would openly ridicule anyone questioning safety and/or efficacy of the COVID-19 injections. After the Directives were issued, the CO would publicly name members who had been released for not being vaccinated or placed on RM. The CO and CoC made it clear that vaccination was an order to be followed without question.
335. The Plaintiff, Dhillon David Cole, is a member of the CAF and holds the rank of Sapper. He is a Combat Engineer with 5 Combat Engineer Regiment posted at CFB Valcartier. He lives in Sainte-Brigitte-de-Laval, Quebec. He has served honourably for over 4 years. Sapper Cole did not receive any COVID-19 injections. He was on PATA leave when Directives were implemented. He applied for a religious accommodation and was denied. He submitted several memos during RM then once Directive 003 was issued no longer required COVID-19 injections and was retained.
336. The Plaintiff, Pierre-Olivier Cote-Guay, is a member of the CAF and holds the rank of Sergeant. He is an Infanteer posted at CFB St. Jean-Richelieu where he held the role of Instructor. He lives in Saint-Philippe, Quebec. He has served



honourably for 15 years. Sgt. Cote-Guay did not receive any COVID-19 injections. He witnessed students have adverse events following their first dose of COVID-19 vaccine. He was placed on RM but following treatment for worsening PTSD, he was retained after Directive 003 was issued. He saw 1 religious accommodation approved while all others were denied.

337. The Plaintiff, Ian M. Menzies, is a member of the CAF and holds the rank of Master Corporal. He is a Vehicle Technician with Royal Canadian Electrical and Mechanical Engineers posted at 33 Service Battalion North Bay. He lives in Hornell Heights, Ontario. He has served honourably for over 12 years. He did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied after 10 months. He was under RM before the decision was issued. Not allowed to work on Base for approximately 2 months then allowed with rapid testing 3 times per week. Several civilian employment opportunities were lost as he was left in waiting for a decision. He was retained after Directive 003 was issued. He has not received any final returns on his grievances.

338. The Plaintiff, Eric Monnin, is a member of the CAF and holds the rank of Corporal. He is a Financial Service Administrator posted at CANSOFCOM. He lives in Chapeau, Quebec. He has served honourably for over 16 years. He received one COVID-19 injection and suffered a severe adverse event but was denied a medical exemption for a second dose. He applied for a religious accommodation and was denied. He was given the option to medically release rather than take a second dose. He is in the process of this medical release.

339. The Plaintiff, Nicholas Neil Lloyd Crocker, was a member of the CAF and held the rank of Sailor One. He was a Marine technician posted to CFB Esquimalt until he was released on 13 July 2022 under a 5(f) category. He lives in Gander, Newfoundland. He served honourably for over 5 years. Mr. Crocker did not receive any COVID-19 injections. He had been diagnosed with myocarditis in 2022 and had a high risk of recurrence. After a temporary accommodation to see a cardiac specialist, he was ordered to have the injections. He applied for a medical accommodation and was denied. After release, financial difficulties had him living with family and struggling to find work.

340. The Plaintiff, Eliot Gamache, was a member of the CAF and held the rank of Corporal. He was an Infanteer with Les Voltigeurs de Québec and posted to 2 Canadian Division Training Centre at CFB Valcartier until he was released with a 5(f) category on 1 March 2023. He lives in Quebec City, Quebec. He served honourably for over 5 years. Mr. Gamache did not receive any COVID-19 injections. He applied for a *CHRA* accommodation and was denied. He requested a voluntary 4(c) release more than a year before his release. His CO approved his 4(c) release more than a month after his actual release under 5(f). My CoC told him the voluntary release was accepted. He was never offered and did not receive a release medical.
341. The Plaintiff, Robert Henderson, was a member of the CAF and holds the rank of Corporal. He is a Mobile Support Equipment Operator posted to 3 Canadian Division Support Battalion at CFB Wainwright until he was released 5(f) category on 14 June 2022. He lives in Edmonton, Alberta. He has served honourably for over 13 years. Mr. Henderson did not receive any COVID-19 injections. His CoC was angry that he would be sent home with pay when civilian employees would be on LWOP. He offered to continue working on Base. He was told the 5(f) release was the worst release category and it was considered a dishonourable discharge. He was told he would lose his pension and retraining benefits.
342. The Plaintiff, Devin James McKenna, is a member of the CAF and holds the rank of Captain. He is a Pilot posted at CFB Moose Jaw. He lives in Bushell Park, Saskatchewan. He has served honourably for over 19 years. He did not receive any COVID-19 injection. He was on PATA leave when the first Directives were issued and was asked to attest to his status in violation of the Directive. He applied for a religious accommodation and was denied. Upon his return from PATA, Capt. McKenna was placed in an isolation area to complete his project while also required to wear a mask when mask requirements had been lifted. He was blocked from employment with CAE as a pilot as it could impair the relationship between the contractor and the CAF.

343. The Plaintiff, Gabriel Gilles RJ Ramsay, is a member of the CAF and holds the rank of Sergeant. He is a Military Police Officer posted at 3 Military Police Regiment. He lives in Kentville, Nova Scotia. He has served honourably for over 14 years. He received two COVID-19 injections. He applied for a medical accommodation given his cardiac history as well as other documented issues and was denied. During the process of his medical evaluation, his CoC continued to pressure him to receive the injections. He was given taskings away from home that also required him to be in isolation from his family for a total of 8 weeks in six months which took a toll on his mental health and that of his family.
344. The Defendant, Department of National Defence (DND) is established by the *NDA* and is presided over by the Minister of National Defence. The Honourable Anita Anand is sued in her official capacity as Minister of National Defence.
345. The Defendant, Jody Thomas is sued in her official capacity as the Deputy Minister of National Defence.
346. The Defendant, CAF is an agency within the Government of Canada. It is primarily an agency for the protection of Canada and its citizens by military means.
347. The Defendant, General Wayne Eyre is sued in his official capacity as the Chief of Defence Staff.
348. The Defendant, Lieutenant General Frances Allen Eyre is sued in her official capacity as the Vice Chief of Defence Staff.
349. The Defendant, Lieutenant General Jocelyn J M J Paul is sued in his official capacity as the Commander of the Canadian Army.
350. The Defendant, Vice Admiral Angus I. Topshee is sued in his official capacity as the Commander of the Royal Canadian Navy.
351. The Defendant, Lieutenant General Eric J Kenny is sued in his official capacity as Commander of the Royal Canadian Air Force.
352. The Defendant, Major General JGM Bilodeau is sued in his official capacity as the Surgeon General of the CAF.

353. The Defendant, Brigadier General JLG Belisle is sued in his official capacity as the Chaplain General of the CAF.
354. The Defendant, Rear Admiral Genevieve Bernatchez is sued in her official capacity as the Judge Advocate General of the CAF.
355. The Defendant, Brigadier General Liam Wade Rutland is sued in his official capacity as a senior officer in the CAF and former Brigade Commander of 1 Canadian Mechanized Brigade Group—CFB Edmonton.

## **STATEMENT OF FACTS**

356. The CAF is an agency founded on the defence of the interests and values of Canada and its Allies, freedom being one of those values, as well as domestic operations in times of emergency. It was not founded as a supervisory and experimental medical or scientific agency. The core of the CAF's work is to be able to plan and execute warfare in the interests and security of Canada. All Plaintiffs were required to be Canadian citizens at the time of their enrollment into the CAF and they surrendered none of their rights when they swore the Oath of Service.
357. The CAF is meant to cultivate excellence of the men and women who have volunteered to serve as its soldiers, sailors, and aircrew and facilitate their efforts to productive ends that foster the defence of the nation. Yet, in effect, the CAF does none of that. Instead, it operates with a focus on political agendas and taking direction from political leaders that is detrimental to operational readiness and effectiveness.
358. In this case, the CAF shirked its own purpose and rushed an untested product onto its members, mislabeled this experimental gene therapy a "vaccine", knowingly made false statements of safety and efficacy, and facilitated its mandate with no option to refuse except for mandatory permanent removal from service. The Plaintiffs were given no way to meet the mandate as the

Directives were written specifically to block any possible means of complying with them.

359. Under the pretext of powers granted to the Chief of Defence Staff (“CDS”), more than two years into the “emergency” of COVID-19, he mandated that biologics were to be given to every single member of the CAF regardless of religion or spiritual belief, medical conditions precluding the treatment or the right to refuse injection of an unproven treatment into their body. All these measures to address COVID-19, a disease which poses a lower risk to healthy young adults and children than the ordinary flu. Indeed, not one member of the CAF has been identified as dying from COVID-19 infection.
360. The CDS stated in communications within the CAF that he was ordered from above him by the “GC” or Government of Canada to bring in and enforce a vaccination mandate for members of the CAF. The goal being to show leadership to the Canadian people and achieve a 100% vaccination rate for members of the CAF. The CDS can only receive lawful orders from the Commander-in-Chief of the CAF which is the Monarch of Canada (Queen Elizabeth II at the time and now King Charles III) or from the Governor General standing in place of the Monarch. There is no indication that the CDS received this order from the Monarch which makes the order to receive any COVID-19 biologic an unlawful order.
361. The CAF defined Moderna and Pfizer-BioTech’s MRNA COVID-19 biologics as “vaccines” even though they do not meet the century long definition of the term. The CAF failed to provide adequate notice or comment period or redress of concerns or grievances for the imposition of mandatory injection of the biologics.
362. The CDS had the authority under s 126 of the *NDA* to order vaccination of the members under his command. He did not do so in this case. Instead, in an unprecedented action, he used administrative measures to punish those who could not or would not follow his instructions. Section 126 of the *NDA* requires a member refusing vaccination to be charged with a service offence and face a court martial. If it is found by an independent decision-maker there is a

reasonable excuse not to have the vaccination, the member is acquitted. A reasonable excuse can include, for example, sincere religious belief. The Plaintiffs were denied the ability to have their cases heard in an independent forum.

363. The CDS also had full control over any grievances brought by members against his decisions as under *KR&O* 7.13(c), the Initiating Authority (“IA”) for these grievances would be the CDS himself. The CDS then gets to determine as IA as well as the Final Authority (FA”) for any of his decisions, acts or omissions thereby denying fundamental justice to the members.
364. Both the assignment for an IA and the FA are not under any timelines to provide a decision and can delay indefinitely any outcome from the grievance process.
365. It has been established by the grievance authorities, in writing, that the grievance system cannot accept any further grievances at the time of filing this claim. Members are therefore denied any ability to seek redress through the grievance system currently in place.
366. The CDS claimed unlimited powers without legislative approval, and even claimed these powers prevent and preclude judicial review. The CAF has become the agency that declares and adjudicates its own law, with military members and their children vulnerable to this power grab.
367. A series of internal investigations by the CAF concluded that military commanders violated federal rules and acted without authority when they ordered intelligence teams to collect information on the public as well as use propaganda techniques against Canadians and their own members.
368. The CAF’s unchecked and unbridled reign over its members’ bodily autonomy with the COVID-19 Directives is the foundation for all policies and mandates imposed on CAF members’ bodily autonomy today and into the future.
369. Members face loss of career, loss of employment opportunities outside the CAF, loss of income, loss of retirement pension, loss of benefits, travel, and even basic participation in work or public life. Members who do have any safeguards against these harmful injections are subjected to the CAF’s false attestations of

safety and effectiveness; as a result, these members, under pressure from their CoC, may “opt” to take this dangerous biologic.

370. COs acted aggressively to coerce members to accept the biologics through acts that, in some cases, were criminal in nature such as forcing members to spend unnecessary extended periods of time outside in extreme winter conditions with no shelter or protections as well as forcibly confining members to small, cramped spaces with no respite for meals or personal hygiene needs.
371. Mandates are being suspended or permanently lifted in Canada and around the world, yet the CAF has refused to suspend or lift its own mandate for its members and, indeed, “doubling down” by making a booster mandatory for participation in such things as deployment or training.
372. The CAF promised its members honesty and full disclosure of any risk members take in the course of their service to Canada. COVID-19 biologics treatment was promised with fair and balanced coverage of safety and efficacy limitations, as well as full informed consent before injection. The CAF broke that promise in this case, a lie that has cost substantial diversion of resources and continuous risk for members in not being able to trust the information and orders given by the CDS and the CoC.
373. We faced an unparalleled moment in CAF and public health history: the race to administer a medical treatment to our Armed Forces without adequate clinical trials, without consideration of relevant information, without robust debate, and without meaningful participation in the administration of the biologics from the members themselves. The CDS and CAF’s extraordinary emergency Directives for all members of the CAF, including pregnant and nursing ones, who face less risk from COVID-19 than from the seasonal flu, endanger their safety, as these biologics lack good manufacturing policies, lack strict safety safeguards, lack accountability, and indeed do not even fit the traditional definition of “vaccine”.
374. The CDS’ unwarranted Directives endanger vaccine confidence, as they follow a historic path within the CAF littered with disastrous debacles of unsafe

yet sanctioned drugs and biologics that have devastated confidence in public health generally and the CoC specifically.

375. The Directives added a new, previously non-existing requirement to disclose the members' personal health information to their CoC. This information was required to be shared via a non-secure portal that did not have protected information status thereby making private health information visible to individuals with no authorization to view the file.
376. On 8 December 2020, General Jonathan Vance, as CDS, issued TASKORD 002 which clearly stated that vaccination to protect against COVID-19 would only be administered after full informed consent had been received from the member. Jody Thomas, then Deputy Minister of National Defence told General Vance to bring in a mandated vaccination program to the CAF. He did not implement a mandate for COVID-19 biologics. On 14 January 2021, General Vance was removed as CDS.
377. Admiral Art McDonald was then named CDS. He was provided with a briefing note on 3 February 2021 about ordering mandatory injections for members of the CAF. The briefing note was clear that this medical treatment could not be mandated under existing laws and medical ethics. Admiral McDonald was removed from command on 24 February 2021. He did not implement a mandate for COVID-19 biologics.
378. On 10 March 2021 and 26 August 2021, General Wayne Eyre was provided with briefing notes outlining the same advice and issues as the briefing note given to Admiral McDonald on 3 February 2021. The briefing note dated 26 August 2021 was written by Lieutenant General Trevor Cadieu who resigned on 5 April 2022.
379. By August 2021, Moderna biologics were being pulled from distribution due to serious side effects in 18–45-year-old people. The risks were or should have been known to the Surgeon General and the CAF at this time.
380. In September 2021, a briefing note was prepared by two chaplains which actively supported rejecting any request for religious accommodations for any



member of the CAF without consideration of personal beliefs, practices and/or faiths outside a limited scope of acceptable religions.

381. On 8 October 2021, the CDS issued Directive 001 ordering all CAF members to declare their vaccination status and become vaccinated with two doses of Moderna even though this product was already proving to be an imminent risk to the population of CAF members without proportional benefit. The Directive included inapplicable and unlawful threats to security of employment, including forced leave without pay which cannot be forced on a member of the CAF under policy and legislation.
382. On 3 November 2021, the CDS issued Directive 002 modifying the original order with a deadline of 15 November 2021 for vaccination status or request for accommodation based strictly on religious grounds, medical grounds and grounds based on the *Canadian Human Rights Act*.
383. On 8 November 2021, an Aide Memoire was issued by Director of Military Career--Administration ("DMCA") providing further guidance for Commanding Officers ("CO") on carrying out the Directives. It was clear in all three documents that the decision regarding accommodation and remedial measures were to be in the hands of each CO and not escalated to higher authority in the CoC. Brigadier General LW Rutland (then Colonel Rutland) formed a committee of members of ranks and trades to review accommodation requests—several members of this committee had no clearance to review private and/or medical information about members posted to CFB Edmonton. They were also not qualified to assess religious and personal beliefs, medical conditions or violations of rights.
384. On 23 November 2021, the Office of the Chaplain General had issued "*RCCHS Supplemental Guidance: COVID-19 Vaccination Accommodation Requests Based on Religious Grounds*" as guidance on religious accommodation. This guidance was long after the CoC had already begun to deny religious accommodations. This document encouraged the rejection of religious accommodations to members.
385. On 22 December 2021, the CDS issued Directive 002-Amendment 1 modifying the original Directive further by allowing for a voluntary release or

transfer to the Supplementary Reserve. Remedial measures still applied to members in the process of release whether for medical release or some other reason.

386. In February 2022, the Chief of Military Personnel issued instructions that DAOD 5019-2 would not apply to members who did not comply with the Directives thereby disregarding the members career and service record in considering their release under 5(f)—Unsuitable for further service category.

387. On 11 October 2022, the CDs issued Directive 003 modifying the original order but not removing the requirement for COVID-19 vaccination in the CAF.

388. None of the Directives nor the Aide Memoire acknowledged the current and binding law of Canada regarding religious and spiritual belief, bodily autonomy, right to medical privacy, informed consent for medical treatment, *NDA* s 126 governing vaccines in the CAF as well as DAOD 5016-0 prohibiting the use of the members of the CAF as subjects in medical experiments without full and informed consent along with strict guidelines governing administration and record keeping. Indeed, members were told that the law of Canada was not binding on the CAF or CDS.

389. The remedial measures policy within the Directives must be very precise and not contradict any existing policies or regulations. In this case, the Directives were vague, disorganized, contained inapplicable references and other errors and the execution was not clear.

390. Administrative measures are also not to be punitive in nature as per DOAD 5019-4 but rather to help a member overcome a deficiency. Under these Directives, the remedial measures were, in fact, punishments for failing to comply with this mandatory medical treatment.

391. Outcomes from administrative measures also cannot be pre-determined also per DOAD 5019-4. It is clear from the Directives and the DMCA Aide Memoire that the outcome for receiving no injections or not enough injections would result in a set outcome, namely, recorded punishments in a service record and release from the CAF.

392. The Directives ignored basic procedural fairness in administering remedial measures under the Directives. The outcome was pre-determined, the description of the deficiency had templated wording, the compliance periods were truncated, and the escalation of the remedial measures were also pre-determined. There was no consideration of other factors such as the member's representations or service record.
393. The Directives state these are temporary measures to deal with a public health event, however, the outcome for members who did not accept the injections was permanent. Most were given a release category (5f) which severely impacted their future for any possible return to the CAF, employment with the public service, and ability to obtain employment benefits while they sought employment outside the CAF.
394. The decisions regarding accommodation and remedial measures resulted in a patchwork of decisions across the CAF. Some COs were relentless and brutal in carrying out the measures. This resulted in, despite the Directive clear delegation of power to the COs, officers higher in the CoC taking over the decision process and enthusiastically running roughshod over the rights and privacy of the members under their command. A few COs, knowing the CAF had a serious manpower issue, were able to accommodate or delay remedial measures.
395. Despite the overwhelming failure of Moderna and Pfizer-BioTech's COVID-19 biologics, the CAF continued its crusade: on 11 October 2022, in Directive 003, the CDS ordered that any member wishing to be posted, promoted or deployed must receive a booster injection.
396. On 4 November 2022, Vice Admiral Angus I. Topshee, Commander of the Royal Canadian Navy issued the requirement for a third booster to sail (be deployed) on ship. He then withdrew this requirement after public pressure on April 27, 2023.
397. To justify the Directives, the CAF ignored, and even hid, data showing severe, short-term risks of COVID-19 vaccination for the population group of the CAF and never admitted that the abbreviated studies could not have been long

enough in duration to assess long-term, severe and irreversible injury. The CAF could not, and did not, arrive at a reasoned explanation of whether benefits outweigh the risk of injury for men and women aged 18-45, let alone for pregnant and nursing mothers. There are certain to be untold casualties and injuries. The men and women of the CAF, healthy and fit with years of life ahead of them, run the greatest risks of vaccine injury, yet have one of the lowest risks from COVID-19 itself than any other age group besides children.

398. At the date of filing this claim, not one member of the CAF has died from COVID-19 despite serving on the front lines of the pandemic in high risk environments like nursing homes; yet there are members with seriously life changing vaccine injuries and deaths from the administration of the biologics.

399. The CDS, General Eyre, was seen on Global News show "West Block" on 28 November 2021 where he supported his view that members who chose not to be vaccinated were, in his view, appropriately released as unsuitable for military service and were showing moral weakness by questioning and/or refusing his unlawful order. This public derision of the Plaintiffs further encouraged other officers and members of the CAF to follow his example by engaging in demeaning and abusive behaviours towards those who were hesitant or were not vaccinated.

400. When Directive 003 was issued, some of the Plaintiffs were still in the CAF and were ordered to return to work where they continue to face isolation, derogatory remarks and actions, failing evaluations and postings to undesirable locations with taskings outside their trade and/or skill set.

401. In this, the premature approval and Directives, the Defendants have abused their powers, denied members the procedural right to seek redress via accommodations, grievances and administrative measures, redefined the term "vaccine" for military members in violation of procedural due process, failed to satisfactorily articulate standards for assessing the safety, efficacy and necessity for the vaccine, and promoted the fraudulent use of the biologics, in violation of s 126 of the *NDA*.

402. The actions of the CAF and CDS has resulted in injury to the Plaintiffs, who have consistently worked to prevent this abuse of power from occurring and to protect the members and their families who are experiencing coercion, discrimination, and threat of loss of career and benefits in all instances.

## BREACH OF THE CHARTER

403. Section 2(a) of the *Charter* provides that all Canadians have the fundamental right to freedom of conscience and religion. The protection is for the conscience of individuals, not the convenience of the state. The purpose of this freedom is to allow every individual to be free to hold and manifest whatever beliefs and opinions one's conscience dictates provided that such manifestations do not injure his or her neighbours or their parallel rights to hold and manifest beliefs and opinions of their own.
404. The CDS did not order vaccinations under s 126 of the *NDA* which gave him the authority to mandate vaccinations for members of the CAF. Had he done so, the member would be formally charged and given a court martial. The defence for s 126 is a reasonable excuse not to accept the vaccination as determined by an impartial decision maker. Members were denied the ability to present a defence and have the decision on their release determined in an independent hearing. Yet they received written reprimands and release documents stating they had not followed a lawful order without charge or hearing.
405. The Plaintiffs plead that the s 2(a) of the *Charter* provides them with the freedom of conscience to choose to exercise that freedom and not undergo a medical procedure, such as vaccination, absent injury to their neighbour. The mandated vaccinations do not prevent the transmission of COVID-19 and as such are ineffective and immaterial to ensuring the health and well-being of others. The Plaintiffs therefore plead that the Directives breach their rights under s 2(a) of the *Charter*. The conduct of the Defendants is not proportional, reasonably justified or saved under s 1 of the *Charter*.
406. The Plaintiffs plead that the s 2(a) of the *Charter* provides them with the freedom of religion and personal belief. Canadian citizens are free to choose their religion or personal beliefs and the associated practices for the religion or beliefs of their choice. The Plaintiffs were denied their right to practice their religion and personal beliefs in a way that is meaningful to them. They were denied religious accommodations even when the accommodations would not

cause undue hardship for the CAF. The Plaintiffs were told their faith was insincere or not closely held. Some were ridiculed for their faith and religious practices. Some religions were openly disregarded by the CAF and not included by the Chaplain General as accepted faiths within the definition of religion prescribed by the CAF. The Plaintiffs therefore plead that the Directives breach their rights under s 2(a) of the *Charter*. The conduct of the Defendants is not proportional, reasonably justified or saved under s 1 of the *Charter*.

407. The Plaintiffs plead that s 2(d) of the *Charter* protects their rights members to associate in a process of collective action to achieve workplace goals and missions. As such, laws or state actions that prevent or deny meaningful discussion and consultation about working conditions between members and their CoC may substantially interfere with the activity of interacting with other military members as well as operational effectiveness.

408. Section 7 of the *Charter* provides that all Canadians have the right to liberty and security of the person and not to be deprived thereof except in accordance with the principles of fundamental justice. It further includes the right to “decide one’s own fate”, including directing the course of their own medical care via informed consent. The right of medical self-determination is not vitiated by the fact that serious risks or consequences, including death, may flow from the patient’s decision. This principle is the same in cases regarding the right to give informed consent to medical treatment, the right to refuse medical treatment, and to demand that treatment be withdrawn or discontinued.

409. Military members do accept ultimate liability upon enrollment in the CAF. This acceptance however is of no force or effect outside of military operations requiring life threatening actions to achieve the mission. COVID-19 was never a battlefield nor was it a military operation requiring sacrifice of military members.

410. The Plaintiffs plead that the Directives violated their rights under s 7 by infringing on their security of the person, liberty, and residual liberty in mandating a medical procedure, and in consequence of non-compliance, punishing the Plaintiffs with significant financial, physical, and emotional harm. The punishments imposed on non-compliance with the Directives have a specific

coercive and deleterious effect on the Plaintiffs resulting in substantial infringement on their s 7 right. The conduct of the Defendants is not proportional, reasonable justified or saved under s 1 of the *Charter*.

411. A decision of the Military Grievances External Review Committee on 30 May 2023 determined that the Directives vaccination policy was arbitrary, overly broad and had disproportionate impact which is contrary to the s 7 *Charter* rights of the members of the CAF and was unreasonable. The conduct of the Defendants was not deemed to be proportional, reasonably justified or saved under s 1 of the *Charter*.

412. Section 8 of the *Charter* provides that every person has a right to privacy, most importantly medical privacy. The Directives required all the Plaintiffs to disclose private medical information on an unsecured network known as Monitor Mass("MM"). In October of 2021, MM did not have Protected B status which is required for confidential information. Private medical information of all members was easily accessible to both their CoC as well as others who did not have any reason to know the information and/or share it with others within the CAF. In addition, other forms of information sharing allowed other members to know private medical information through emails with names clearly visible, lists left in clear view of others within the CAF offices, being isolated into outdoor tents or small rooms during working hours as well as requiring testing and wearing of masks by only those who were not recorded as having received the injections.

413. The Plaintiffs plead that because of the Directives their rights under s 8 of the *Charter* have been infringed upon as they were subjected to differential treatment by their peers and superiors in the CoC. This had the effect of perpetuating or promoting the view that the Plaintiffs were a risk or less worthy of recognition or value as human beings or as members of Canadian society. The conduct of the Defendants is not proportional, reasonable justified or saved under s 1 of the *Charter*.

414. Section 15 of the *Charter* provides that every person is equal before and under the law and has the right to the equal protection and benefit of the law without discrimination based on race, ancestry, sex or gender.



415. The Plaintiffs plead that because of the Directives their rights under s 15 of the *Charter* have been infringed upon as they were subjected to differential treatment by imposing a burden upon them and punitively withholding the benefits of employment from them in a manner which reflects the stereotypical application of presumed group or personal characteristics or which otherwise has the effect of perpetuating or promoting the view that the Plaintiffs are less capable or worthy of recognition or value as human beings or as members of Canadian society, equally deserving of concern, respect and consideration. The conduct of the Defendants is not proportional, reasonable justified or saved under s 1 of the *Charter*.

416. *Charter* damages are a just and appropriate remedy in this case to vindicate rights, deter conduct and achieve the objective of the compensation.

## **PRIVACY RIGHTS**

417. The Plaintiffs plead that requiring them to disclose private medical information to the CoC intentionally or recklessly or wilfully, and without claim of right, intruded upon the Plaintiffs private affairs; a reasonable person would regard this intrusion as highly offensive and causative of distress, humiliation and/or anguish.

418. The Plaintiffs plead that the Directives intrusion in disclosure of private medical information violates common law and statutory rights pursuant to the *Privacy Act* RSC 1985 c P-21. The CAF is a government agency and is therefore governed by the federal statute.

## **AGGRAVATED AND PUNITIVE DAMAGES**

419. The Plaintiffs plead that the Defendants, by virtue of the conduct included in this Statement of Claim have inflicted mental, physical and emotional distress by engaging in conduct:

- a. that constitutes conduct that is flagrant and outrageous;

- b. that was calculated to produce harm and produce the consequences that flowed from the Directives; and
  - c. that resulted in injury to the Plaintiffs.
420. The Plaintiffs plead that the conduct of the Defendants as outlined in this Statement of Claim demonstrates a wanton, high-handed and callous disregard for the interests of the Plaintiffs. This conduct merits an award of aggravated and punitive damages.

## **LEGISLATION, REGULATIONS AND ENACTMENTS**

421. The Plaintiffs rely on the following legislation, regulations, documents, and enactments:
- a. *Canadian Charter of Rights and Freedoms*, ss. 1, 2, 7, 8, and 15;
  - b. *Constitution Act, 1982*;
  - c. *Crown Liability and Proceedings Act* RS 1985 c C-50;
  - d. *Canadian Bill of Rights*, SC 1960 c 44;
  - e. *Civil Code of Quebec* CQLR cC-1991 s 1621
  - f. *Federal Court Rules*, SOR/98-106;
  - g. *The Nuremberg Code (1947)*;
  - h. *National Defence Act* RSC 1985 c N-5;
  - i. *Kings Regulations and Orders*;
  - j. Defence Administration Orders and Directives;
  - k. Directive on Vaccination 001, 002, 002-Amendment and 003; and
  - l. Such further and other authorities and legislation as counsel may advise and this Honourable Court may accept.

## **REMEDIES**

422. The Plaintiffs repeat the claims for relief as set out in paragraph 1 above.

## JURISDICTION AND VENUE

423. The Crown is liable for the damages for which, if it were a person, it would be liable, in respect of a tort committed by a servant of the Crown (*Crown Liability and Proceedings Act* RS 1985 c C-50 s3(b)).
424. The Crown is liable for the violation of the Charter by a servant of the Crown (*Crown Liability and Proceedings Act* RS 1985 c C-50 s3(b)).
425. Officers of the Canadian Armed Forces are servants of the Crown (*Crown Liability and Proceedings Act* RS 1985 c C-50 s36).
426. The Plaintiffs are residents of Canada.
427. The actions of the Defendants all occurred in Canada.
428. The Plaintiffs propose that this action be tried at Edmonton, Alberta.

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