

COURT FILE NUMBER 2401-05557  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY  
PLAINTIFF CARRIE SAKAMOTO

Clerk's Stamp

Not Filed Copy

DEFENDANTS HIS MAJESTY ATTORNEY GENERAL OF CANADA and  
HIS MAJESTY KING IN THE RIGHT OF ALBERTA

*Brought under the Class Proceedings Act, SA 2003, c C-16.5*

DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE Rath & Company  
AND CONTACT Barristers and Solicitors  
INFORMATION OF 282050 Highway 22 W  
PARTY FILING THIS Foothills, AB T0L 1W2  
DOCUMENT

**Attention: Jeffrey R. W. Rath/Eva Chipiuk**

Phone:

Facsimile:

Email:

Email:

I, Carrie Sakamoto, of the City of Lethbridge, in the Province of Alberta, MAKE OATH AND SAY AS FOLLOWS:

1. I am the Plaintiff's in this application and am named as proposed representative Plaintiff in this action. As such, I have personal knowledge and information of the facts stated herein except where stated to be based upon information and belief and where so stated, I believe the facts to be true.
2. I was born on November 7, 1975, and am now 48 years old. I am the mother of our three boys aged 14 years, 17 years and 22 years old, respectively.
3. Prior to receiving any vaccinations for Covid 19 (collectively "**Covid Vaccines**"), I did not have any health problems, and I did not suffer from any serious physical injuries, nor did I suffer from any serious illnesses or diseases. I was mentally and emotionally strong and I generally enjoyed good mental and physical health. After receiving the Pfizer Covid Vaccine on June 18, 2021, I nearly died. I spent 17 days in the hospital and during this period, I lost the ability to walk, chew, talk, and concentrate.

4. Starting in March 2020, I was constantly exposed to messages about the dangers of Covid. By December 2020, there were strong and constant messages on television, radio, social media and newspapers. They were everywhere, saying the Covid Vaccines were “safe and effective” and urging us to get vaccinated. These messages were coming from the highest government authorities within the Government of Canada (“**Canada**”) and Government of Alberta (“**Alberta**”), including:
  - Justin Trudeau, the Prime Minister of Canada;
  - Dr. Theresa Tam, the Chief Public Health Officer for Canada;
  - Jason Kenney, the Premier of Alberta; and
  - Dr. Deena Hinshaw, the Chief Medical Officer of Health for Alberta.
5. I did not take the Covid Vaccines out of personal preference; I took the Covid Vaccines under duress and I relied on representations made by various representatives of the Defendants. This includes public health authorities with Canada and Alberta and elected officials who urged me and other members of the public to get vaccinated. These representatives promoted the vaccines as safe, effective, and crucial for preventing the spread of Covid. They also suggested that without vaccination, individuals would increase the risk of spreading respiratory illnesses like Covid, stating that vaccination was necessary in order for life to return to normal.
6. I felt pressured by the representatives of Canada and Alberta to take the Covid Vaccines without fully understanding the risks and dangers of the Covid Vaccines or that I could suffer severe negative side effects when taking the Covid Vaccines.
7. At the time of receiving the Covid Vaccines, I did not receive any information about the potential serious side effects of the Covid Vaccines from any health professionals who administered the Covid Vaccines to me. I was never advised by any health professionals that there are severe negative side effects associated of the Covid Vaccines.
8. On April 21, 2021, I received the AstraZeneca Covid Vaccine and on June 18, 2021, I received the Pfizer Covid Vaccine. I received both Covid Vaccines at the Alberta Health Services immunization clinic set up at the Lethbridge Exhibition Parks West Pavilion.
9. My Alberta Health Services “COVID-19 Client Immunization Record and Care After Immunization” forms (the “**Consent Forms**”) for the AstraZeneca Covid Vaccine and the Pfizer Covid Vaccine are attached hereto at **Exhibit “A”** and **Exhibit “B”** respectively.
10. The only side effects disclosed to me were those outlined in the Consent Forms, which state:

Many people have no side effects from the COVID-19 vaccine. If you do have side effects, they tend to be mild and go away in a few days. Side effects may include:

- redness, warmth, swelling, bruising, itching or feeling sore where you had the needle;
- feeling tired or unwell;
- headache;
- a fever or chills;
- body aches or sore joints;
- feeling sick to your stomach (nausea) vomiting (throwing up), or loose stool (diarrhea);
- swollen lymph nodes; and
- a cough.

**Rare events after getting either the AstraZeneca/COVIDSHIELD or the Janssen vaccine**

Between 4 and 28 days after getting either the AstraZeneca/COVIDSHIELD or the Janssen (Johnson and Johnson) vaccine, there have been very rare reports of blood clots, low levels of platelets (those help your blood to clot), and bleeding.


[emphasis not added]


11. I was not informed of any serious side effects, health risks, or dangers associated with the Pfizer Covid Vaccine.
12. I was not informed of any serious side effects, health risks, or dangers beyond the rare instance of blood clotting associated with the AstraZeneca Covid Vaccine.
13. I was not warned of any serious side effects, health risks, or dangers from mixing different types of Covid Vaccines. In fact, I heard various government representatives say mixing Covid Vaccines was safe and might even provide additional protection against the Covid virus.
14. Within a few hours after receiving the Pfizer Covid Vaccine, I felt very sick, with flu-like symptoms that got worse over time.
15. On June 30, 2021, twelve days after receiving the Pfizer Covid Vaccine, my mother took me to Chinook Regional Hospital in Lethbridge because I was severe pain in my head and constant vomiting. On the way to the hospital my face began to droop. The medical practitioners diagnosed it as Bell's Palsy, provided some treatment, and sent me home. At home my condition and symptoms continued to worsen.

16. On July 1, 2021, my husband took me back to Chinook Regional Hospital because my condition and symptoms continued to worsen, and I was admitted into the hospital.
17. The right side of my face and throat were paralyzed, I was unable to eat, swallow, talk and walk for a number of days. I also had constant pain, hearing loss, and loss of balance.
18. On July 5, 2021, doctors told me that my injuries were caused by the Covid Vaccines. I was diagnosed with severe and permanent Bell's Palsy, along with other serious conditions and impacts such as hearing and vision loss.
19. While in the hospital, Dr. Verna Yiu, then President and CEO of Alberta Health Services, came to observe me at the hospital. She did not speak to me. She just looked at me from the doorway and left after a few minutes.
20. I was discharged from the hospital on July 15, 2021. I had to relearn to eat, swallow, talk and walk before I was released from the hospital. I remained in a very weakened condition when I was released. I was unable to take care of myself or my family.
21. On November 1, 2021, our family had to sell our home and farm at a significant loss because I could no longer take care of myself or our family home. I needed ongoing medical treatment in the city.
22. On August 10, 2022, my doctor, Dr. Jerrett Stephenson confirmed that it was not safe for me to take any more Covid Vaccines because of my adverse reaction of the Covid Vaccines. Attached at **Exhibit "C"** is the letter from Dr. Jerrett Stephenson confirming that it was not safe for me to take any more Covid Vaccines.
23. Despite my condition, Alberta Health Services officials called me on two separate occasions and continued to pressure me to get a booster shot claiming it was "safe" for me to do so.
24. In July of 2021, while I was still in the hospital, my husband applied on my behalf of Canada's Vaccine Injury Support Program ("**VISP**").
25. Almost two years later, on March 3, 2023, I was accepted into the VISP program because the medical staff at the VISP program confirmed that my injuries "met the threshold of serious and permanent for the purposes of VISP" and were likely caused by the Pfizer vaccine. Attached at **Exhibit "D"** is my acceptance into the Vaccine Injury Support Program.
26. The physical, psychological, and emotional toll has been immense for me and my family. I continue to suffer from a range of related health problems, including constant muscle cramping, tension and pain on my face, neck and back, paralysis, hearing and vision loss, pain, memory loss, and vertigo. I also have trouble sleeping and suffer from anxiety and depression. My condition is constantly being assessed by various medical professionals, as the effects are evolving and require day-to-day adjustments in treatment.

27. The VISIP program has been extremely frustrating and, at times, feels incredibly dismissive and even abusive. Since March of 2023, I have been assigned to eight case managers. The case managers do not stay long and are frequently replaced. Navigating the VISIP program has been a dehumanizing experience, particularly given my medical and psychological conditions.
28. Fighting the government for recognition of my Covid Vaccine injuries through the VISIP program or this lawsuit exacerbates my suffering, especially after representatives of the government of Canada and Alberta urged me and the public to take the Covid Vaccines.
29. I have been disheartened and I am demoralized by the treatment I have received by both Canada and Alberta's governments. The lack of support and the suppression of my injury by those who should be managing and providing me assistance with my health crisis, which was triggered by the vaccines they promoted, has been profoundly demoralizing and dehumanizing.
30. I swear this Affidavit in support of the application to approve this case to proceed as a class action and for no improper purpose.

SWORN BEFORE ME in the Town of )  
Priddis, Alberta, this 11th day of )  
September, 2024. )


  
\_\_\_\_\_  
Eva Chipiuk  
Barrister & Solicitor

  
\_\_\_\_\_  
Carrie Sakamoto

THIS IS EXHIBIT " A "  
REFERRED TO IN THE AFFIDAVIT  
OF

Carrie Sakamoto

SWORN BEFORE ME THIS  
11th DAY OF September, 2024.

  
A Notary Public, A Commissioner for  
Oaths in and for the Province of Alberta

Eva Chipiuk  
Barrister & Solicitor

Keep this document as your personal immunization record.

**Immunization Record**

Last Name <u>Sakamoto</u>	First Name <u>Carrie</u>	Middle Initial
Date of Birth (dd-Mon-yyyy) <u>07-Nov-1975</u>	Date of COVID-19 Immunization (dd-Mon-yyyy) <u>Apr-21/21</u>	
<input type="checkbox"/> <b>You need 2 doses of COVID-19 vaccine.</b> Your next dose is due <u>9 Months</u>	Dose <input type="checkbox"/> 1 of 1 <input checked="" type="checkbox"/> 1 of 2 <input type="checkbox"/> 2 of 2 <b>Vaccine (Manufacturer)</b> <input type="checkbox"/> Pfizer-BioNTech <input type="checkbox"/> Moderna <input checked="" type="checkbox"/> AstraZeneca/COVISHIELD <input type="checkbox"/> Janssen <input type="checkbox"/> Other _____	
<input type="checkbox"/> <b>You are complete.</b>		

**Care After Immunization**
**Side Effects**

Many people have no side effects from the COVID-19 vaccine. If you do have side effects, they tend to be mild and go away in a few days. Side effects may include:

- redness, warmth, swelling, bruising, itching or feeling sore where you had the needle
- feeling tired or unwell
- headache
- fever or chills
- body aches or sore joints
- feeling sick to your stomach (nausea), vomiting (throwing up), or loose stool (diarrhea)
- swollen lymph nodes

Call Health Link at 811 to report any serious or unusual side effects. If you are calling from outside of Alberta, call 1-866-408-5465. It is rare to have a serious side effect.

**Rare events after getting the AstraZeneca/COVISHIELD vaccine**

There have been very rare reports of blood clots, low levels of platelets (these help your blood to clot), and bleeding 4 to 20 days after getting the AstraZeneca/COVISHIELD vaccine.

If you have any of the following symptoms, get medical help **right away**:

- shortness of breath
- chest pain
- leg swelling
- stomach pain that does not go away
- a severe headache that does not go away
- blurry vision
- bruising (other than where you had the needle)
- red or purple spots anywhere on your body
- bleeding (more easily than normal)

For more information about the COVID-19 vaccine, read the COVID-19 vaccine information sheet on [www.ImmunizeAlberta.ca](http://www.ImmunizeAlberta.ca) or talk to your healthcare provider.

See reverse for more information

This material is for information purposes only. It should not be used in place of medical advice, instruction or treatment. If you have questions, talk to your doctor or appropriate healthcare provider.



**If you have side effects that are the same as COVID-19 symptoms**

If you have side effects that are the same as COVID-19 symptoms, you must stay home and away from others (isolate), even if you think the side effects are from the vaccine.

- If your side effects start within 24 hours and go away within 48 hours after the side effects start, you do not have to keep isolating and you can go back to your normal activities. But if you were told to isolate for other reasons, you must keep isolating.
- If your side effects start after 24 hours or last longer than 48 hours, stay home. Contact Health Link at 811 or use the COVID-19 Self-Assessment for Albertans ([ahs.ca/testing](https://ahs.ca/testing)) to make an appointment for a COVID-19 test. If you do not get tested for COVID-19, you must stay at home for 10 days from the start of your symptoms or until you no longer have symptoms, whichever is longer.

If you only have redness, swelling, or soreness where you had the needle, you do not need to stay home and away from others.

**What can I do to feel better?**

- To help with soreness and swelling:
  - Put a cool, wet cloth over the area where you had the needle.
  - Move the arm or leg where you had the needle.
- If you have a fever, wear fewer layers of clothes and drink more fluids. For more information about fever, go to [MyHealth.Alberta.ca](https://MyHealth.Alberta.ca).
- There is medicine to help with a fever or pain. Check with your doctor or pharmacist if you are not sure what medicine or dose to take. Follow the directions on the package.
- Children under the age of 18 years should **not** take aspirin because it can cause serious health problems.
- Some people with health problems, such as a weak immune system, must call their doctor if they get a fever. If you were told to do this, call your doctor even if you think the fever is from the vaccine.

**If I had the COVID-19 vaccine, do I still have to follow public health measures?**

Yes, it is still important to practice recommended public health measures to prevent the spread of COVID-19, even if you have had the vaccine. This includes:

- following guidelines of when to wear a mask or other equipment that helps protect you
- washing your hands often
- staying 2 meters away from others
- staying home when you are sick (this means isolating)
- staying home for 14 days after having close contact with someone who has COVID-19 or after returning from travel outside of Canada (this means quarantining)

Visit [ahs.ca/covid](https://ahs.ca/covid) for more information, including information about isolation and quarantine.

**For More Information**



Call Health Link at 811



Go to [MyHealth.Alberta.ca](https://MyHealth.Alberta.ca)



Go to [ImmunizeAlberta.ca](https://ImmunizeAlberta.ca)



Go to [ahs.ca/covidvaccine](https://ahs.ca/covidvaccine)

**Alberta Health Services (AHS), Alberta Precision Laboratories (APL) and Covenant Health Workers:**

Report your COVID-19 immunization using the self-reporting form on Insite: [insite.ahs.ca/covidshot](https://insite.ahs.ca/covidshot)

Your immunization status is used to plan, manage and allocate resources to protect patients, family and healthcare workers.

To get an electronic copy of the immunizations you have had in Alberta, register for a MyHealth Records account at [MyHealth.Alberta.ca/myhealthrecords](https://MyHealth.Alberta.ca/myhealthrecords)

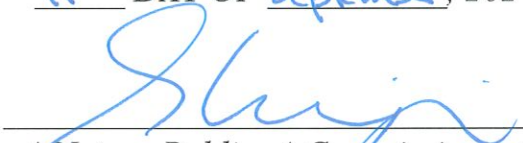
This material is for information purposes only. It should not be used in place of medical advice, instruction or treatment. If you have questions, talk to your doctor or appropriate healthcare provider.



THIS IS EXHIBIT " B "  
REFERRED TO IN THE AFFIDAVIT  
OF

Carrie Sakamoto

SWORN BEFORE ME THIS  
11th DAY OF September, 2024.

  
A Notary Public, A Commissioner for  
Oaths in and for the Province of Alberta

Eva Chipiok  
Barrister & Solicitor

Keep this document as your personal immunization record.

Immunization Record			
Last Name <u>Sakamoto</u>		First Name <u>Carrie</u>	Middle Initial
Date of Birth (dd-Mon-yyyy) <u>07/11/1975</u>		Date of COVID-19 Immunization (dd-Mon-yyyy) <u>JUN 18 2021</u>	
<input type="checkbox"/> <b>You need 2 doses of COVID-19 vaccine.</b> Your next dose is due _____		Dose <input type="checkbox"/> 1 of 1 <input type="checkbox"/> 1 of 2 <input checked="" type="checkbox"/> 2 of 2	
<input checked="" type="checkbox"/> <b>You are complete.</b>		<b>Vaccine (Manufacturer)</b> <input checked="" type="checkbox"/> Pfizer-BioNTech <input type="checkbox"/> Moderna <input type="checkbox"/> AstraZeneca/COVISHIELD <input type="checkbox"/> Janssen <input type="checkbox"/> Other _____	
Lot Number _____			

### Care After Immunization

#### Side Effects

Many people have no side effects from the COVID-19 vaccine. If you do have side effects, they tend to be mild and go away in a few days. Side effects may include:

- redness, warmth, swelling, bruising, itching or feeling sore where you had the needle
- feeling tired or unwell
- headache
- a fever or chills
- body aches or sore joints
- feeling sick to your stomach (nausea), vomiting (throwing up), or loose stool (diarrhea)
- swollen lymph nodes
- a cough

Call Health Link at 811 to report any serious or unusual side effects. If you are calling from outside of Alberta, call 1-866-408-5465. It is rare to have a serious side effect.

#### Rare events after getting either the AstraZeneca/COVISHIELD or the Janssen vaccine

Between 4 and 28 days after getting either the AstraZeneca/COVISHIELD or the Janssen (Johnson and Johnson) vaccine, there have been very rare reports of blood clots, low levels of platelets (these help your blood to clot), and bleeding.

If you have any of the following symptoms, get medical help **right away**:

- trouble talking or moving a part of your body
- shortness of breath
- chest pain
- severe swelling, pain, or a colour change in your arm or leg
- stomach pain that does not go away
- a severe headache that does not go away
- blurry vision
- seizures

For more information about the COVID-19 vaccine, read the COVID-19 vaccine information sheet on [www.ImmunizeAlberta.ca](http://www.ImmunizeAlberta.ca) or talk to your healthcare provider.

See reverse for more information

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- There is medicine to help with a fever or pain. Check with your doctor or pharmacist if you are not sure what medicine or dose to take. Follow the directions on the package.
- Children under the age of 18 years should **not** take aspirin because it can cause serious health problems.
- Some people with health problems, such as a weak immune system, must call their doctor if they get a fever. If you were told to do this, call your doctor even if you think the fever is from the vaccine.

**If I had the COVID-19 vaccine, do I still have to follow public health measures?**

Yes, it is still important to practice recommended public health measures to prevent the spread of COVID-19, even if you have had the vaccine. This includes:

- following guidelines of when to wear a mask or other equipment that helps protect you
- washing your hands often
- staying 2 meters away from others who do not live with you
- staying home when you are sick (this means isolating)
- staying home for 14 days after returning from travel outside of Canada (this means quarantining)

You may not have to quarantine after having close contact with someone who has COVID-19. This depends on how many doses of the COVID-19 vaccine you have had and if you have symptoms. Visit [ahs.ca/quarantineaftervaccine](https://ahs.ca/quarantineaftervaccine) for more information.

**For More Information**


Call Health Link at 811



Go to [MyHealth.Alberta.ca](https://MyHealth.Alberta.ca)



Go to [ImmunizeAlberta.ca](https://ImmunizeAlberta.ca)



Go to [ahs.ca/covidvaccine](https://ahs.ca/covidvaccine)

**Alberta Health Services (AHS), Alberta Precision Laboratories (APL) and Covenant Health Workers:**

Report your COVID-19 immunization using the self-reporting form on Insite: [insite.ahs.ca/covidshot](https://insite.ahs.ca/covidshot)

Your immunization status is used to plan, manage and allocate resources to protect patients, family and healthcare workers.


To get an electronic copy of the immunizations you have had in Alberta, register for a MyHealth Records account at [MyHealth.Alberta.ca/myhealthrecords](https://MyHealth.Alberta.ca/myhealthrecords)

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THIS IS EXHIBIT " C "  
REFERRED TO IN THE AFFIDAVIT  
OF

Carrie Sakamoto

SWORN BEFORE ME THIS  
11th DAY OF September, 2024.

  
A Notary Public, A Commissioner for  
Oaths in and for the Province of Alberta

Eva Chipchuk  
Barrister & Solicitor



*The Campbell Clinic, established 1906*

CAMPBELL CLINIC SOUTH  
[REDACTED]

August 10, 2022

RE: Carrie Sakamoto  
[REDACTED]

To Whom It May Concern:

Please note that due to previous major adverse events associated with COVID vaccination, it is my medical recommendation that Carrie not receive either a 3rd or 4th dose of COVID vaccine.

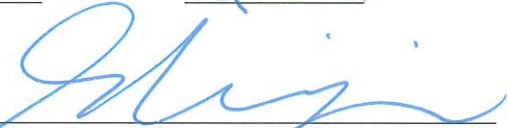
Sincerely,

Dr. Jerrett Stephenson  
MD, CCFP  
[REDACTED]

THIS IS EXHIBIT " D "  
REFERRED TO IN THE AFFIDAVIT  
OF

Carrie Sakamoto

SWORN BEFORE ME THIS  
11<sup>th</sup> DAY OF September, 2024.

  
A Notary Public, A Commissioner for  
Oaths in and for the Province of Alberta

Glen Chipiuk  
Barrister & Solicitor



**Vaccine Injury  
Support Program**

116 Albert Street  
Ottawa, Ontario  
K1P 5G3

[vaccineinjurysupport.ca](http://vaccineinjurysupport.ca)

Please contact us with any questions.

**Kelly Roxane Ingabire**

Case Manager

Vaccine Injury Support Program



## APPENDIX

The Vaccine Injury Support Program (VISP) Medical Review Reassessment Board was comprised of the same three specialists in Neurology, Internal Medicine, and Emergency Medicine that constituted the original Board. It was previously determined that the Pfizer COVID-19 vaccine likely caused right facial palsy in this claimant and that the resultant injuries met the threshold of serious and permanent for the purposes of VISP. There was insufficient evidence in the originally-provided clinical records from which to determine severity, and it was recommended that the claimant be sent copies of sections 3.5.1 (Hearing), 3.10 (Mimic), and 3.25.2 (Esthetic of the face) of the VISP Severity Assessment Guidelines to assist her health practitioner in providing an updated objective assessment.

After reviewing the provided clinical records, the Board was unanimous in determining the following severity for those three categories:

- 3.5.1 Hearing - severity category 0.5 (based on audiometry 2022-11-08)
- 3.10 Mimic - severity category 3 (based on primary care provider's assessment)
- 3.25 Esthetic of the face - severity category 4 (based on primary care provider's assessment)

We thank the claimant again for her submission.