

COURT FILE NUMBER 2401-05557

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PLAINTIFF CARRIE SAKAMOTO

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  
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DOCUMENT

**Attention: Jeffrey R. W. Rath/Eva Chipiuk**  
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I, Tracey Bradley, of the Town of Okotoks, in the Province of Alberta, AFFIRM THAT:

1. I am a Document Controller for Rath & Company, Barristers and Solicitors. As such, I have personal knowledge of the matters herein deposed to, except where stated to be upon my information and belief, in which case, I have identified the source of that information and I believe that information to be true.
2. Attached as **Exhibit "A"** are examples of the representations made by the Government of Canada that Covid Vaccines were "safe and effective," "interchangeable" and that side effects are rare. I am advised and believe that these are accurate representations made by the Government of Canada to the public at large on their social media platforms.
3. Attached as **Exhibit "B"** are examples of the representations made by the Government of Alberta that Covid Vaccines were "safe and effective," "interchangeable," that side effects are rare and "may actually boost your immune response." Included are also examples of representations made by the Government of Alberta of the financial incentives offered by them to get vaccinated. I am advised and believe that these are accurate representations made by the Government of Alberta to the public at large on their social media platforms.

4. Attached hereto as **Exhibit “C”** is a copy of a redacted version of the Pfizer-BioNTech (“**Pfizer**”) Covid Vaccine contract signed by the Government of Canada on October 26, 2020 (the “**Pfizer Covid Vaccine contract**”), which can also be found online at:

[https://drive.google.com/file/d/1DGIxi2gS95nt5F1fZdCnKuaMSC\\_Xlc-h/view](https://drive.google.com/file/d/1DGIxi2gS95nt5F1fZdCnKuaMSC_Xlc-h/view).

5. I am advised and believe that the Pfizer Covid Vaccine contract was obtained through an Access to Information request made to the Public Services and Procurement Canada in June of 2021, request number A-2020-00482 for “Contract between Pfizer and Canada for COVID-19 vaccines.” Attached hereto as **Exhibit “D”** is the Government of Canada Information Request Number: A-2020-00482, which can also be found on the Government of Canada website at:

<https://open.canada.ca/en/search/ati/reference/6669303c723d67af9c252f2b47d086aa>.

6. Attached hereto as **Exhibit “E”** is Pfizer’s Covid Vaccine product monograph dated March 21, 2023, which can also be found on the Government of Canada website at:

<https://covid-vaccine.canada.ca/info/pdf/pfizer-biontech-covid-19-vaccine-pm1-en.pdf>.

7. Attached hereto as **Exhibit “F”** is AstraZeneca PLC (“**AstraZeneca**”) Covid Vaccine product monograph dated November 19, 2021, which can also be found on the Government of Canada website at:

<https://covid-vaccine.canada.ca/info/pdf/astrazeneca-covid-19-vaccine-pm-en.pdf>.

8. Attached hereto as **Exhibit “G”** are the National Advisory Committee on Immunization recommendations dated December 12, 2020, which can also be found on the Government of Canada website at:

<https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci/recommendations-use-covid-19-vaccines/december-12-2020.html>.

9. Attached hereto as **Exhibit “H”** is the U.S. Food and Drug Administration (“FDA”) Emergency Use Authorization (“EUA”) Pfizer-BioNTech COVID-19 Vaccine EUA Amendment Review Memorandum dated April 9, 2021, which can also be found on the FDA website at:

<https://www.fda.gov/media/148542/download>.

10. Attached hereto as **Exhibit “I”** is the Alberta health Services Policy for Consent to Treatment/Procedure(s) effective October 31, 2010 and revised January 16, 2023, which can also be found on the Alberta Health Services website at:

<https://extranet.ahsnet.ca/teams/policydocuments/1/clp-consent-to-treatment-prr-01-policy.pdf>.



11. Attached hereto as **Exhibit “J”** is the College of Physicians and Surgeons of Alberta Standards of Practice for Informed Consent, which can also be found on the College of Physicians and Surgeons of Alberta website at:

<https://cpsa.ca/wp-content/uploads/2020/05/Informed-Consent.pdf>.

12. Attached hereto as **Exhibit “K”** is an article from British Pharmacological Society titled “Medicines legislation and regulation in the United Kingdom 1500-2020” published online on September 23, 2022, which can also be found on the National Library of Medicine website at:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10087031/>

13. Attached hereto as **Exhibit “L”** is the Government of Canada’s announcement of the “Mandatory COVID-19 vaccination requirements for federally regulated transportation employees and travellers” dated October 6, 2021, which can also be found on the Government of Canada website at:

<https://www.canada.ca/en/transport-canada/news/2021/10/mandatory-covid-19-vaccination-requirements-for-federally-regulated-transportation-employees-and-travellers.html>.

14. Attached hereto as **Exhibit “M”** is the Government of Alberta’s announcement of CMOH Order 45-2021 enacting the “2021 COVID-19 Response - Alberta Government’s Restrictions Exemption Program dated September 24, 2021, which can also be found on the Government of Alberta website at:

<https://open.alberta.ca/dataset/72886185-805c-49fd-8e81-8830d8da7659/resource/b6db5481-f3f9-4d31-93c4-f8c80ddd2207/download/health-cmoh-record-of-decision-cmoh-order-45-2021.pdf>.

15. Attached hereto as **Exhibit “N”** is the Alberta Health Services “COVID-19 Scientific Advisory Group Rapid Evidence Report” dated as first assessment September 17, 2020, which can also be found on the Alberta Health Services website at:

<https://www.albertahealthservices.ca/assets/info/ppih/if-ppih-covid-19-sag-rapid-evidence-report-attitudes-and-adherence-to-covid-19-guidelines.pdf>.

16. Attached hereto as **Exhibit “O”** is the Government of Canada’s “Reported side effects following COVID-19 vaccination in Canada” last updated January 19, 2024 with data up to and including January 5, 2024, which can also be found on the Government of Canada website at:

<https://health-infobase.canada.ca/covid-19/vaccine-safety/>.

17. Attached hereto as **Exhibit "P"** is the Government of Canada's "Provisional deaths and excess mortality in Canada dashboard" showing data for Alberta for the 2022 year, which can also be found on the Government of Canada website at:

<https://www150.statcan.gc.ca/n1/pub/71-607-x/71-607-x2021028-eng.htm>.

18. Attached hereto as **Exhibit "Q"** is an article from International Society for Infectious Disease titled "Excess deaths during the COVID-19 pandemic in Alberta, Canada" published online on August 30, 2022, which can also be found on the National Library of Medicine website at:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9424127/>.

SWORN BEFORE ME at the Hamlet of )  
 Priddis, Alberta, this 12<sup>th</sup> day of )  
 September, 2024. )

Commissioner for Oaths in and for the )  
 Province of Alberta )

CONNIE J. M. TUHARSKY  
*Barrister and Solicitor*  
 A Notary Public in and for  
 The Province of Alberta

My Appointment expires at the )  
 Pleasure of the Attorney General of Alberta )

Tracey Bradley

PRINT NAME AND EXPIRY