



## CITADEL LAW CORPORATION

1400-1125 HOWE STREET  
VANCOUVER BC V6Z 2K8  
PH: 778-945-9990

Philip J. Dougan  
Silvano S. Todesco  
Polina H. Furtula\*

---

File No. 1502-1

August 31, 2021

### VIA MAIL

University of Northern British Columbia  
3333 University Way  
Prince George, BC V2N 4Z9

Dear Sirs/Mesdames:

**Re: Mandatory Vaccination Order**

***Canadian Society for the Advancement of Science in Public Policy v. HMTQ and Dr. Bonnie Henry et al, SCBC Vancouver Registry File No. S210831***

We represent the Canadian Society for the Advancement of Science in Public Policy<sup>1</sup> in the above noted action brought pursuant to the B.C. *Class Proceedings Act*. The class action challenges the constitutional basis of the British Columbia Public Health Officer and provincial government's COVID-19 related orders, amongst others. A copy of the Notice of Civil Claim is attached.

The Public Health Officer, Dr. Henry, made a press release on August 24, 2021 that she will be issuing a new order requiring students, faculty and staff to provide proof of vaccination to access a broad range of social, recreational, and discretionary events throughout British Columbia post-secondary institutions as of September 7, 2021.

The proposed order also affects post-secondary on-campus student housing, without any exceptions for health, religious or other circumstances.

By requiring students, faculty and staff to be vaccinated you will be discriminating against some members of the public who for example have respiratory and other health or religious concerns that make vaccination not possible or dangerous to their health. This is a form of discrimination based on physical disability and religion and is contrary to ss.8 and 13 of the BC *Human Rights Code*.

We have instructions to challenge the proposed order, including seeking a stay, and hereby put you on notice that any steps taken by your institution to discriminate against students that have not been vaccinated may result in liability for any personal injury and other damages arising from

---

<sup>1</sup> <https://www.covidconstitutionalchallengebc.ca>

---

## CITADEL LAW CORPORATION

1400-1125 Howe Street, Vancouver, BC V6Z 2K8  
120-256 Wallace Street, Nanaimo, BC V9R 5B3

\*Denotes Law Corporation  
•Associate Counsel

Polina Furtula 778-945-9990 [pfurtula@citadellawyers.ca](mailto:pfurtula@citadellawyers.ca)



mandatory vaccination requirements, and you should verify with your insurer if you are covered in such eventuality.

While the government's actions may be well meaning, in our opinion, they are not based in law or in substantiated scientific evidence and are prejudicial to members of our community.

Yours very truly,

CITADEL LAW CORPORATION

A handwritten signature in black ink, appearing to read 'PH Furtula', with a long horizontal flourish extending to the right.

Per:

POLINA H. FURTULA