



Constitutional Rights Centre Inc.  
Centre De Droit Constitutional Inc.

1062 College St. (Lower Level)  
Toronto, ON Canada M6H 1A9

Tel: 416.530.9684

Fax: 416.530.8129

July 24, 2021

Dear President David Agnew:

Re: "Mandatory Vaccinations" for Students On-Campus

We represent Children's Health Defense Canada. We are writing to request that Seneca College (hereinafter "College") immediately rescind its policy, announced June 18, 2021, mandating "COVID 19 vaccinations" for students to learn on campus.

Children's Health Defense Canada (hereinafter "CHDC") is a federally registered not-for-profit organization devoted to advocating for and promoting the optimal physical and mental health of all Canadian children and youth. CHDC is directed by a group of dedicated volunteers and parents who work closely with many Canadian medical and legal experts in support of children's health. CHDC is 100% funded by public donations and does not accept government or corporate funding.

CHDC has been contacted by many concerned parents regarding the unwarranted and medically and scientifically unsupported mandatory "COVID 19 vaccine" requirements being imposed upon their children at Colleges and Universities as it has not been mandated by the government and health agencies.

Therefore, CHDC requests that the College rescind and retract the "COVID 19 vaccine" mandate forthwith considering that it has not been approved by Health Canada for general use and has only been made available for "Emergency Use Authorization" (EUA). Moreover, the EUA is not mandated by the Minister of Colleges and University, or any level of government. The decision, and therefore the liability, for mandating lies with the College.

This serves to notify you that there are inherent risks and liabilities in requiring your students submit to inoculations which are experimental and have documented adverse effects. Recently, on June 29 and 30, 2021, Health Canada issued "recalls and safety alerts" for PfizerBioNtech and Moderna, as well as AstraZeneca and COVISHIELD vaccines. As of July 16,

2021, data released by the Centers for Disease Control and Prevention (CDC) Vaccine Adverse Event Reporting System<sup>1</sup> (VAERS) includes 463,457 injuries of which 10,9991 are deaths. Data for University age students specifically shows:

48 reported deaths;  
63 reports of blood clotting disorders;  
620 cases of myocarditis and pericarditis (heart inflammation);  
88 heart attacks.

Historically, as generally accepted, these reported deaths and injuries only account for approximately no more than 10% of the actual deaths and injuries. So, these numbers need to be multiplied by ten (10).

An EUA must show that the benefits outweigh the risks; yet as shown above the risks are alarming. The AstraZeneca vaccine has been suspended in Canada and elsewhere. Moreover, clinical trials have not been completed, and other, as of yet unknown, adverse effects have not been identified. Consequently, it is imprudent for the University to mandate a medical procedure which is experimental, incomplete in study, and not approved.

While Seneca University states “All Seneca safety policies and programs will comply with the regulations/procedures as set out in Provincial and Municipal Acts and Regulations”, inoculation of the EUA injection is *not* mandated by either the Province or Municipality. The reason for this is because the Supreme Court of Canada has ruled that any forced medical treatment, without informed voluntary consent violates section 7 of the *Charter*. Therefore, there is no authority for the College to mandate EUA inoculations for its students, as a requirement to access and exercise their right to education on campus. The College *is*, however, required to follow and respect Provincial Statute and Regulations regarding health care consent and treatment, as well as protect personal and private information of its members, including its most vulnerable — the students. The Seneca College mandate therefore does *not* comply with Provincial Acts and Regulations, and in fact, runs afoul of, the principals and objectives, as well as the spirit and letter, of numerous Statutes including, *inter alia*, the *Health Care Consent Act*, and the *Personal Health Information Protection Act*. Seneca College cannot be used as prophylactic for otherwise unconstitutional conduct under the guise of private activity covered by contract and tort.

Moreover, the College is required to respect *Charter* values, interests and rights under our *Constitution*. While your statement regarding the “Seneca Vaccination Policy” explicitly states “We are not *requiring* anyone to get a vaccine,” this is contradicted by the statement “*vaccinations will be a condition of participating in on-campus activities.*” A requirement and a condition are one and the same as they place a necessary action on students in order to access education on campus. The College does not have the legal authority to pressure, coerce, or extort students in this manner.

Also, historically, if 50 deaths are attributed to any drug/vaccine, its use is suspended. What is happening now is an onslaught. What you are requiring, in our *legal* opinion, thus, further constitutes a crime against humanity, contrary to Canadian Criminal law under the *War*

*Crimes and Crimes Against Humanity Act*, in that you are forcing medical experimentation without informed consent.

In a news release the College is quoted as stating “students who choose not to be vaccinated, they will need to take a program that is offered either online or in a flexible delivery format,”. Clearly, “unvaccinated” students will be limited in their education and educational opportunities. Thus, your policy undermines *Charter* values, where in the Supreme Court of Canada has affirmed, “[t]he promotion of equality entails the promotion of a society in which all are secure in the knowledge that they are recognized at law as human beings equally deserving of concern, respect and consideration”. The mandate makes an arbitrary and unlawful distinction between “vaccinated” and “unvaccinated” students and undermines your own Discrimination and Harassment policy. It draws a distinction between the two groups despite the fact that the EAU inoculation does not prevent either infection or transmission. Therefore, this policy cannot be justified as a means of reducing risk on campus. Furthermore, as a matter of contract law your condition is void for being unconscionable in that it is unconstitutional to coerce or force unwanted medical treatment.

Finally, your policy statement, you explicitly say “we will respect medical exemptions”. With respect, the College cannot either dictate which student should receive medical treatment, or which students should not. Medical treatment is a personal and individual choice and the College has no place in such decisions. The College does not have authority to inquire, collect, record or require protected and private medical information or treatment, under any legislation, and, in fact, is specifically prohibited from doing so under the *Freedom of Information and Protection of Privacy Act* (hereinafter "*FIPPA*"). The College, as defined under section 2 (1) of the *FIPPA*, is bound by the requirement to protect the privacy of individuals with respect to personal information, including as it relates to medical information. Disclosure of such information, including whether or not, a student has, or has not, received medical treatment is presumed to constitute an unjustified invasion of privacy under section 21 (3) of the *FIPPA*.

Given the flagrant breaches cited, we request you immediately cease and desist the Policy. Failing which, this serves to notify you that no student should be asked about, pressured, or required, to take the EUA inoculation in order to attend College on-campus and we respectfully request that you remove this mandate by July 30, 2021, or legal action will ensue.

Yours truly,



Amna Sherazee

Barrister & Solicitor

Operational Director, CRC

cc: Ministry of Training Colleges and Universities