



Canada Health Alliance Canadian Covid Care Alliance



Date

Occupant of the Office of Primary Recipient

Primary Recipient Name

Street Address

City, Province, Postal Code

Notice: Unlawful and Deceptive Marketing of Drugs and Medical Devices

Dear Mr. /Ms. _____,

The Canada Health Alliance and the Canadian Covid Care Alliance are organizations comprised of physicians and scientists who scrutinize government and public health policies. It has come to the attention of our two organizations that school boards, school principals, teachers and other staff involved in the education of children and adolescents in this province may be illegally marketing COVID “vaccines”.

There are numerous illegal methods of marketing drugs as outlined in the Canadian **Food and Drug Act**. These may include misrepresentation of a product, verbal endorsement, posting promotional signage, coercing consent, facilitating the administration of a drug, and giving permission for gymnasiums, parking areas and other school property to be used for drug administration by outside healthcare personnel. Promoting a vaccine by permitting students to skip classes in order to get the shots might also be considered a form of marketing through rewarding behaviour. Any promotion of vaccination by staff, irrespective of the staff’s motivation, could be considered illegal marketing

The use of school facilities, an environment in which students have a significant desire to conform and are surrounded by their peers, to administer drugs may be considered to be coercive. This technique of employing school gymnasiums for vaccination programmes has been shown to increase uptake by enlisting psychological pressure and bypassing true informed consent.

The Ministry of Education appears to encourage the use of schools to administer drugs, but the final responsibility will belong to all individual members of the school boards, the school principals, teachers, and anyone who is associated with promoting vaccines illegally under the Food and Drug Act.

Please be advised and on Notice that _____ appears to be
[company/office]
acting in bad faith and in violation of the law as represented by the following claim.

Attached is communication from _____ that
[location address/business name]

appears to be in direct violation of the **Marketing of drugs and medical devices** according to the Government of Canada as well as *Section 52 of the **Competition Act (R.S.C., 1985, c. C-34,*** which reads as follows:

False or misleading representations

- **52 (1)** No person shall for the purpose of promoting, directly or indirectly the supply or use of a product or for the purpose of promoting, directly or indirectly any business interest by any means whatever knowingly or recklessly make a representation to the public that is false or misleading in a material respect.

For further clarity, the following practices are considered illegal marketing techniques of drugs and medical devices, in accordance with the ***Food and Drugs Act (R.S.C., 1985, c. F-27)***

- **9 (1)** No person shall label, package, treat, process, sell or advertise any drug in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.

The ***Food and Drugs Act (R.S.C., 1985, c. F-27)*** clearly defines an advertisement as any representation by any means whatever for the purpose of promoting directly or indirectly the sale or disposal of any food, drug, cosmetic or device.

Section 2 of the ***Food and Drug Act*** defines “therapeutic product” is a drug or device or any combination of drugs and devices.

Any breach of the above is an offence and punishable by fines and imprisonment and may result in civil liability for damages for any and all harms caused by your breach of the **Food and Drugs Act** and by virtue of the law of negligence. The **Food and Drugs Act** states the following with respect to punishment for such a violation:

Contravention of Act or regulations

31 Subject to sections 31.1, 31.2 and 31.4, every person who contravenes any of the provisions of this Act or of the regulations, or fails to do anything the person was ordered to do by an inspector under section 25 or 27.2, is guilty of an offence and liable

- **(a)** on summary conviction for a first offence to a fine not exceeding five hundred dollars or to imprisonment for a term not exceeding three months or to both and, for a subsequent offence, to a fine not exceeding one thousand dollars or to imprisonment for a term not exceeding six months or to both; and
- **(b)** on conviction on indictment to a fine not exceeding five thousand dollars or to imprisonment for a term not exceeding three years or to both.

31.2(1) Subject to section 31.4, every person who contravenes any provision of this Act or the regulations, as it relates to a therapeutic product,... Is guilty of an offence and liable

- **(a)** on conviction by indictment, to a fine not exceeding \$5,000,000 or to imprisonment for a term not exceeding 2 years or to both; and
- **(b)** on summary conviction, for a first offense, to a fine not exceeding \$250,000 or to imprisonment for a term not exceeding 6 months or to both and, for a subsequent offense, to a fine not exceeding \$500,000 or to imprisonment for a term not exceeding 18 months or to both.

31.4(1) A person who contravenes section 21.6, or who knowingly or recklessly causes a serious risk of injury to human health in contravening another provision of this Act or the regulations, as it relates to a therapeutic product,... is guilty of an offence and liable

(a) on conviction on indictment, to a fine the amount of which is at the discretion of the court or to imprisonment for term not exceeding 5 years or to both; and

(b) on summary conviction, for a first offense, to a fine not exceeding \$500,000 or to imprisonment for a term not exceeding 18 months or to both and, for a subsequent offense, to a fine not exceeding \$1,000,000 or to imprisonment for term not exceeding 2 years or both

Section 31.6 of the Act confirms that if a person other than an individual commits an offense, than any of the person's directors, officers or agents or mandataries who directs, authorizes, assents to or acquiesces or participates in commission of the offense is a party to the offense and is liable on conviction to the punishment provided for by the Act, even if the person is not prosecuted for the offense.

Section 31.7 of the Act confirms that if an offense is committed under section 31.2 or 31.4 on more than one day, he constitutes a separate offense for each day which is committed or continued.

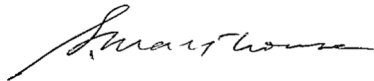
The attached documents from _____ appear to violate the **Food and
[company/office]**

Drugs Act.

Receipt of this notice means you cannot claim you are not aware of your legal obligations set out above. Failure to cease and to desist from such behavior and practices immediately upon receipt of this notice will confirm you are knowingly and intentionally continuing with this behavior despite being warned of your legal obligations. It will further serve to confirm that you, _____, are prepared to accept full responsibility and
[primary recipient]

any and all civil liability concerning the facts outlined in this Notice, for which future claims may follow.

Sincerely,



Stephen Malthouse, MD

President, Canada Health Alliance

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David A. Ross, FCPA, FCA

President, Canadian Covid Care Alliance

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