## FEDERAL COURT

RETWEEN:

**Applicant** 

And

**Treasury Board** 

Respondent

APPLICATION UNDER s. 18.1 of the *Federal Courts Act* (R.S.C., 1985, c. F-7)

## Affidavit of Christine Massey

- I, Christine Massey, Biostatistician, of the City of Peterborough, in Peterborough County, in the Province of Ontario, AFFIRM THAT:
- 1. I hold a Master's degree in Biostatistics<sup>1</sup> from the Dalla Lana School of Public Health, University of Toronto, and have worked professionally in the past as a Biostatistician.
- 2. I am fully competent to make this declaration and I make it voluntarily.
- 3. I testify as an expert to the facts set forth herein, and my statements herein are based upon personal knowledge.
- 4. In May 2020, I began submitting Freedom-of-Information (FOI) requests, to Canadian health and science institutions, asking for all studies or reports in the possession, custody, or control of each institution that describe the isolation/purification of SARS-COV-2<sup>2</sup> directly from a sample taken from a diseased human where the patient sample was not first combined with any other source of genetic material.

<sup>&</sup>lt;sup>1</sup> Biostatistics refers to the development and application of statistical methodology in the fields of public health, the health sciences, and biology

<sup>&</sup>lt;sup>2</sup> Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) is the name of the alleged "COVID-19 virus" (originally referred to as the 2019 novel coronavirus or 2019-nCoV)

- 5. I clarified that my requests were not limited to records authored by the institution in question nor to records which describe work done by that institution, but included any study or report authored by anyone anywhere. And, if the institution held a publicly-available record, I asked that it provide me with enough information about that record so that I may identify it and access it with certainty.
- 6. Thus far, I have received responses from well over 25 Canadian institutions. I have also personally obtained several FOI responses from institutions outside of Canada, including the United States' Centers for Disease Control and Prevention (CDC).
- 7. Other people have also supplied me with additional documents that appear to me to be legitimate FOI³ responses from additional health, science, and political institutions, in Canada and elsewhere in the world, in response to the same, or similar, requests for records describing the isolation and purification of SARS-CoV-2. In most cases, I was provided the original unredacted communications and redacted myself the name of the request submitters in order to protect their identity.
- 8. At the signing of this affidavit, none of the 138 institutions from the European Union and the 28 countries<sup>4</sup> around the world were able to provide or cite even one record describing the isolation and purification of SARS-CoV-2.
- 9. All 138 responses are readily available to view on my website: fluoridefreepeel.ca.

Affirmed before me, in the City of Peterborough, in Peterborough County, in the Province of Ontario, on November 30, 2021.

omplissioner fo<del>r Ta</del>king Affidavits)

Lynn Fawn, Deputy Clerk of the County of Peterborough a Commissioner of Oaths by virtue of office

<sup>3</sup> Except for South Africa and Portugal where I was provided with apparent court documents

<sup>&</sup>lt;sup>4</sup> Australia, Brazil, British Isles, Canada, Columbia, Czech Republic, Denmark, England, India, Ireland, Italy, Lithuania, Netherlands, New Zealand, Norway, Philippines, Portugal, Scotland, Serbia, Slovenia, South Africa, Spain, Sweden, Ukraine, United Kingdom, United States, Uruguay, and Wales