

Curtis Riddolls HRTO Complaint Particulars

Background (What Happened)

1. I am currently studying Animal Biology at the University of Guelph. I am in my third year of a four-year program working towards earning a Bachelor of Science degree. I want to become a Veterinarian. My intention, as of late, has been to attend the Guelph University Veterinarian School.
2. On August 12, 2021, the office of the President of the University of Guelph announced a mandatory COVID vaccination policy for all in-person, on-campus classes and use of campus facilities. The following day, an email was sent from the University confirming the announced policy.
3. The email sent to confirm the policy also explained the process to obtain a human rights-based exemption. Such an exemption would presumably allow a student to continue fulfilling their degree requirements because the University would accommodate the student so the student did not have to abandon their studies.
4. About a week later I was notified by the University that any student who was provided accommodation would be required to undergo a COVID rapid test within 72 hours of being on campus.
5. I submitted a request pursuant to the protected ground of Creed, based on my sincere Christian beliefs regarding the COVID vaccines and mandating the COVID vaccines. This process was completed online without the submission of extra forms. The University approved my request on August 23, 2021 and granted me accommodation in the form of an exemption from the requirement to receive the COVID vaccines in order to continue my studies.
6. On August 31, the University announced changes to its vaccination exemption system and revoked my previously-approved exemption.

7. On September 6, 2021, I submitted a second accommodation request. Unlike the first exemption request, this request required the submission of a form stating my religious belief. This request was denied three days later on September 9.
8. The refusal to accommodate meant that I was prohibited from attending in-person classes. I was only able to take courses “online” via my computer and the internet. As a result, I was no longer able to do a lab course that I wanted to do and needed to do to complete my degree requirements.
9. On October 7, 2021, the University sent an email to students announcing that students who had not received the COVID vaccines by October 15, 2021 would be manually deregistered from classes with in-person components on October 19, 2021 by the University.
10. At that time, in early October, I was still attending my statistics class, as the professor had said at the beginning of the course that it was possible to complete the course online, without attending the in-person lectures. On October 19, 2021, I was still continuing in the course, as I was able to do it remotely using the notes posted on the internet by the professor. I did not attend the in-person lectures.
11. On October 19, 2021 I received an email stating that I had been deregistered from the above-mentioned statistics class. The email stated that I was in a course that had mandatory in-person components, and because of my “non-compliance”, I was removed from the course. This was quite startling, as I had assumed the course could be done online because of the professor’s prior comments at the beginning of the semester.
12. I immediately reached out to the professor and the University of Guelph’s Return to Work Steering Committee requesting to be reinstated into the class. I needed to get reinstated as I wanted to apply to the Ontario Veterinary College this fall (2021), and to do so I am required to have a full semester with 2.5 credits. Losing this course would keep me from applying, making all my efforts in the fall 2021 semester completely worthless.

13. On October 20, 2021, I was reinstated into the statistics class but received no confirmation advising me of the reinstatement. I found out when I logged into CourseLink, which is the University's online course tool that all classes use. I logged in to do my other classes and saw the icon for my statistics class was put back, so I was once again registered in the course. This unnecessary disruption to my studies caused me significant stress and reiterated my status as a "second class" student due to the fact, which should not be known by others, that I have not received the COVID vaccines.
14. Throughout the fall 2021 semester, I received several emails from the University reprimanding those who ostensibly contravened the various rules purporting to restrict unvaccinated students from doing certain activities or attending certain locations.

Impact of the Discrimination

Veterinarian School

15. The undergraduate degree I am attempting to complete at Guelph University (BSc in Animal Biology) is required in order to get into Veterinarian School. In order to apply for Vet School, I must complete two consecutive semesters of full coursework, back-to-back, and those semesters must be winter 2022 and fall 2022 because it must be in the fall semester of my fourth year that I submit my application for Vet School.
16. If I am unable to complete the winter semester of 2022, and am compelled by the University to defer, I will not be eligible to be accepted into Vet School for 2023-2024 because I will not meet the requirements to apply in the fall of 2022. This will set me back an entire year regarding my career intentions to become a Veterinarian.

Emotional Impact

17. As a result of the discrimination I have suffered, I have been isolated. I feel like I am not an equal student, like I do not deserve to be there because I am not one of the desirable people, or because I am somehow unclean.
18. Being prohibited from campus has deprived me of social interaction with my peers, friends, and support groups. The compelled isolation from others has been painful.

19. I felt like I was living in some strange nightmare in which it was impossible to have a candid conversation with another human being. I felt like nobody could see me and nobody knew that I was being quietly kicked out of university. It was devastating. I was not merely attending the University of Guelph because I thought it would be fun and I had nothing better to do. I was trying to get an education so I could make something of myself and my life, and hopefully positively contribute to society.
20. Even more important, I felt like my religious beliefs were not good enough for the University. I felt that I myself as a Christian was not good enough, not equal to other students, and somehow dirty, unwanted, and unwelcomed by the University.

Remedy

21. I am seeking general damages directly associated with the discrimination, in the amount of \$5,000 for the injury to my dignity caused by the discriminatory actions of the University.
22. I am seeking an Order directing the University of Guelph permit me to complete my degree requirements, including attending in-person classes as required, and to have equal access to campus facilities accessible to the general student population.
23. I further seek a Declaration that the University of Guelph's mandatory COVID vaccination policy and processes be amended to ensure *bona fide* human rights-based accommodation requests are granted and that students to whom such accommodation is granted have equal access to University services and facilities.

Creed

24. I am a Christian, that is, a follower of Jesus Christ. I believe the entirety of the Holy Bible is true and that I am duty-bound out of love for my God and King to abide by all the commands in Scripture to the best of my ability. As a Protestant, my loyalty is to Jesus Christ and His Word (the Bible), not to any particular Christian leader or their teachings. That some Christian teachers or leaders have endorsed the COVID vaccines is religiously (and therefore legally) irrelevant.

25. I sincerely hold to religious beliefs that compel me to not receive into my body the COVID vaccines due to their nature and contents. I am also religiously compelled by my beliefs to not participate in a mandatory COVID vaccination scheme, which, among other sinful things, involves coercion and vitiation of consent because it inevitably causes some individuals to receive the COVID vaccines against their will. Disobeying the Lord in this matter would be a sin, a sin which, if I committed, would grieve me deeply and cause me spiritual and moral distress.
26. I understand my obligation at law to demonstrate that I hold sincere religious beliefs that have a nexus with religion (Christianity), and that would be interfered with in a manner that is more than trivial or insubstantial.¹ Reproduced below is the full articulation of my relevant sincere religious beliefs, including references to Scripture:
- a. In all circumstances Christians seek to live in freedom, without fear, and openly before God and other people because “it is for freedom that Christ set us free” (Galatians 5:1). If I received the COVID vaccines, it would be for no other reason than because someone in a position of power over me told me to. To do that would be to act out of fear. I am commanded by the Bible to fear God, not other people (Matthew 32-33; Galatians 1:10; Proverbs 1:7, 29:25). If I received the COVID vaccinations, I would be violating my conscience and committing a sin (James 4:17). “Do not be afraid of those who kill the body but cannot kill the soul. Rather, be afraid of the One who can destroy both soul and body in hell. ... Whoever acknowledges me before others, I will also acknowledge before my Father in heaven. But whoever disowns me before others, I will disown before my Father in heaven” (Matthew 10:28).
 - b. My Lord and Saviour, Jesus Christ is a God of justice who hates injustice, oppression, and tyranny (Deuteronomy 10:17–20; Isaiah 1:15–17; Ecclesiastes 3:16–17; 4:1; 5:8; Psalms 7:11; 9:7–9). He has appointed government to do good and to avenge evil (Romans 13:3–4; 1 Peter 2:13–14). Jesus’ concern for justice is my concern, as a follower of Jesus Christ. Out of love for neighbor and obedience

¹ See *Syndicat Northcrest v Amselem*, 2004 SCC 47.

to Christ, I am called to resist oppression, which necessarily includes coercive vaccination programs, whether at the hands of government or private entities (Ephesians 5:11).

- c. Jesus Christ is the supreme King of all, and I am subject to His final authority alone in all matters of conscience, what I do with my body, and how I respond to societal injustice and coercive efforts to control my behaviour, which is a form of temptation (Ephesians 4:4-6; Colossians 1:16-18). Christians recognize that they will one day stand before God to give an account for their lives and therefore seek to exercise wisdom and discernment in all their decisions, and to live to please the Lord (Romans 12:2; II Corinthians 5:10). Further, I believe I must not be conformed to the ways of the world, but to be transformed by the renewing of my mind based on God's ways, which are above the ways of the world and of men, so that I "will be able to test and approve what God's will is—his good, pleasing and perfect will (Romans 12:2; Isaiah 55: 8-9). I sincerely believe that if I received the COVID vaccines, I would commit a sin before God and that God's will for me is to not receive the COVID vaccines.

- d. Fundamental to the Christian faith is the belief that all human persons bear the image of God (Genesis 1:27, 9:6). Christians are instructed by Scripture to view their bodies as temples of the Holy Spirit and to steward their bodies as creatures ultimately accountable to God (Romans 12:1-2; I Corinthians 3:16-17, 6:19-20). For me, this extends to not injecting my body with substances such as those contained in the COVID mRNA vaccines, which are the only ones currently widely available and acceptable to authorities. Some of these substances are not fully known, potentially dangerous, and have the effect of interfering with or manipulating my natural cell composition and cell mechanisms. The mRNA and the "spike protein" this mRNA codes for are examples. I am compelled to maintain both the physical and spiritual integrity of her body, including my Divinely-designed cell mechanisms. I believe I am fearfully and wonderfully made by God and must trust my health first to God, to His design of my immune system (over a man-made intervention that may alter the function of my immune

system and is necessarily inferior to God's design), and the sources of natural health and healing that God has provided (Genesis 1; Exodus 23:25; Psalms 91:5-7 and 139:14; I Corinthians 3:19; Jeremiah 17:5).

- e. I am deeply concerned that the COVID vaccine and associated vaccine passports and mandates are a precursor to or may become the "mark of the beast" referred to in the Bible (Revelation 13:16-17). I am compelled to exercise wisdom regarding this matter (Revelation 13:18) by being very careful to not inadvertently receive the mark, as to receiving the mark is to commit a sin and to betray Christ, while the rewards of remaining loyal to Christ are eternal life (Revelation 14:11, 16:2, 19:20, 20:4). I must avoid anything that could be associated with the mark of the beast.
- f. Christians are required to fully, diligently, and resolutely honour the sanctity of human life, which I believe manifests at conception and includes pre-natal life (Genesis 1:27, 4:1 and 17, 9:6; Jeremiah 1:5; Psalms 22:10-11, 106:35-38, 113:7-9, 127:3, 139:13-16; Matthew 18:1-4, 19:13-15). "Whoever sheds human blood, by humans shall their blood be shed; for in the image of God has God made mankind" (Genesis 9:6). For me, this necessarily extends to protecting, through my choices, unborn children from medical experimentation in the *testing, development, or production* of vaccines, and not participating *directly or indirectly* in any vaccine that was derived *directly or indirectly* from aborted human fetal cell lines (Exodus 20:13, Leviticus 18:21, 20:2-5, Deuteronomy 12:30-32, 18:10, 2 Kings 16:3, Psalm 16:38). Receiving any of the COVID vaccines would be to violate this belief and commit a sin before God (James 4:17; Romans 14:23; Leviticus 20:1-5). How products for human consumption are obtained and what they are derived from is important for me, just like it was for King David and the prophet Daniel (2 Samuel 23:15-17 and Daniel 1:8-14). In my adult life, I have not and will not receive any vaccine implicated by human abortion, which is to say I have not and will not take most vaccines, most vaccines being implicated by human abortion.