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October 24, 2022

VIA EMAIL

Amanda E. Lawrence-Patel
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Dear Ms. Lawrence-Patel,

RE: Request for Accommodation (COVID Vaccine Requirement) – Aidan Haskell

I write as counsel for Aidan Haskell, a fourth-year undergraduate student at Western. The purpose of this letter is to formally request Creed-based accommodation for Mr. Haskell regarding Western's COVID vaccine booster requirement pursuant to section 1.0(ii)(b) of Policy 3.1.1, effective September 6, 2022. Mr. Haskell requires in-person access to campus, yet section 1.0(ii)(a) of the Policy will, as of next semester, exclude students who do not prove receipt of a COVID booster vaccine. Unless, that is, they have been granted a human rights accommodation.

As you know, Mr. Haskell already requested accommodation on the basis of his religious beliefs, but was denied by way of a brief, anonymous email that contained no reasons for the denial and failed to explain how the extensive explanation provided by Mr. Haskell of his Christian beliefs regarding the COVID booster vaccine does not entitle him to accommodation.

Mr. Haskell is unable to receive any COVID booster vaccines due to his sincere Christian beliefs. So as to confirm he holds sincere religious beliefs that have a nexus with religion (Christianity), and would be interfered with in a manner that is more than trivial or

insubstantial,¹ Mr. Haskell herein appends a statement of his relevant religious beliefs. These are the beliefs he will attest to should accommodation continue to be denied and a human rights complaint necessitated.

You will no doubt be quick to note Mr. Haskell's statement of beliefs does indeed share similarities with fellow Christian students that hold similar or identical beliefs to his regarding the COVID vaccines and associated mandates to receive them.

I am in receipt of your letter of today's date, in which your client persists in propagating the legal fiction that because it appears the Christian Western students I represent are using "template" affidavits or statements of beliefs, Western is somehow entitled to discriminate against them. It would seem your still-bizarre conclusion a Christian student's beliefs are not protected by law if they are similar to those of other students is a result of your unfounded allegation my clients are not sincere in their Christian beliefs. Continuing to wantonly accuse these students of insincerity regarding their Christian beliefs only serves to exasperate Western's already egregious discrimination toward them and expose your client to public ridicule and increased damages should this matter be litigated.

Your position is capricious and evinces bad faith. It is also unlawful, as reflected by the fact you cite no authority supporting this position.

The Christian Western students I represent do indeed rely upon the same "template": the Bible and core Christian doctrines arising from a theology 2,000 years in the making.

Any assertions on the part of Western that Mr. Haskell's religious beliefs are not sincerely held or do not have a nexus with Christianity are therefore disingenuous, including suggestions that Mr. Haskell's beliefs are somehow not "personal" enough.

The specificity of Mr. Haskell's appended beliefs plainly establishes the required nexus with a religion (Christianity). Further, any *reasonable* person, upon reviewing the highly-detailed beliefs he herein provides, would conclude that receiving a COVID booster vaccine would interfere with Mr. Haskell's religious beliefs in a manner that is far more than trivial or insubstantial.

COVID vaccine mandates may assist Western in establishing its *bona fides* as a "woke" institution, but the law—and dare I say ethics—cares about whether such discriminatory policies are scientific. Notwithstanding the ideological and optical motivation for Western's COVID vaccine mandates, Mr. Haskell reminds your client that, scientifically, both the COVID vaccines themselves and vaccine mandates are unnecessary and ineffective, like so many other undesirable control measures that only serve to abrogate rights and undermine human dignity. If indeed the vaccines are effective, unvaccinated persons pose no concern whatsoever. If the COVID vaccines are ineffective, which real-world data repeatedly demonstrates, then

¹ See [Syndicat Northcrest v Amselem, 2004 SCC 47](#), at paragraphs 39-59. The *Amselem* test for demonstrating a protected religious belief has been adopted by the Ontario Human Rights Tribunal.

discriminating against, stigmatizing, and excluding those who are unable to receive the vaccines due to protected characteristics is not only unlawful, it is nothing short of asinine and cruel. Providing reasonable accommodation to Mr. Haskell jeopardizes the “health and safety” of no one on campus.

Again, it would continue to appear Western concedes the forgoing, as neither you nor Western have yet suggested otherwise. Instead, you have preferred to arbitrarily claim the duty to accommodate has not been triggered and to contemptuously accuse these Christian students they do not actually believe the beliefs they have attested to.

Mr. Haskell is entitled at law to be accommodated such that he is able to effectively complete all his in-person academic requirements, notwithstanding his inability to receive the COVID vaccines due to his religious beliefs.

He requests a substantive response to his request herein no later than November 7, 2022. Should your client persist in its bad faith rebellion against its legal obligation to accommodate Mr. Haskell, he will be compelled to take all legal action necessary to enforce his rights and receive compensation for any resulting delay or loss to his education.

Regards,



James S.M. Kitchen
Barrister & Solicitor
Counsel for Aidan Haskell

cc John Doerksen, Vice-Provost, Students (doerksen@uwo.ca)
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Enclosure

STATEMENT OF SINCERE RELIGIOUS BELIEFS OF AIDAN HASKELL

Introduction

1. I, Aidan Haskell, am a fourth-year undergraduate student at Western University. As I will elaborate on below, I succumbed to the coercion to receive the first two doses of the COVID vaccines in 2021.
2. This statement of my sincere religious beliefs I make for the purposes of requesting human rights accommodation on the basis of religious belief, or “Creed” as it is referred to in the Ontario *Human Rights Code*.
3. I am a Christian; a follower and disciple of the Lord Jesus Christ, and I believe the entirety of the Holy Bible is true.
4. I understand, as part of my request for accommodation, I am obligated to demonstrate I hold sincere religious beliefs that have a nexus with religion (Christianity) and would be interfered with in a manner that is more than trivial or insubstantial. Reproduced herein is the full articulation of my relevant sincere Christian religious beliefs, including references to the Bible, regarding the COVID vaccines.
5. I sincerely hold to Christian religious beliefs that compel me to not receive into my body any further COVID vaccines due to the known and unknown contents of the vaccines, the manner in which they were produced, the deception that surrounds them, and the coercion involved in the mandatory imposition of them upon myself and those around me.
6. If I received any further COVID vaccines, it would be an act of disobedience against the Lord Jesus Christ. It would be sin. A sin which, if I committed, would grieve me deeply and cause me spiritual and moral distress.

My Story

7. As I explained to Western in my original letter asking for a religious exemption to the COVID booster, I complied when Western administration demanded that all students receive two doses of the COVID vaccine at the end of summer 2021.
8. Part of my willingness to do so arose from my commitment to my Christian faith and to show love to my neighbor. That is, I didn't do it for me but for the vulnerable around me.
9. At the time, I examined the available data and it suggested that my risk from the virus, as a fit young man, was infinitesimally small (at the time, the dangers of the vaccine to young men were not widely publicized—more on that below). However, government officials and public health authorities repeatedly and aggressively insisted that by being vaccinated I would be doing my part to end the spread of Covid. They said the vaccine would stop or significantly curb transmission. We were told to do the job for the good of others.
10. That “end to Covid” has not materialized and new evidence contradicts many of the earlier claims made by health and government officials. In short, the claim that taking the vaccine is a means of showing love to one’s neighbour has crumbled. It does not help one’s neighbour. In fact, as explained below, I believe it hurts my neighbours by contributing to the tyranny imposed upon my neighbours through various COVID vaccines mandates. Further, as a Christian I am commanded not to participate in falsehoods. In my original letter to Western asking for a religious exemption, I detail, at great length, the numerous points of scripture that show this to be established Christian doctrine—doctrine that taking the shot would contravene.
11. I also complied to get the double dose of the COVID vaccines because, at the time, I did not see it as a substance that was potentially harmful to my body. As I mentioned above, at the time, the dangers of the vaccine to young men were not widely publicized. Since that time, it has become widely known the vaccines contain substances particularly harmful to young men such as myself. In my original letter to Western asking for a religious exemption I detail, at great length, the numerous studies that confirm this to be so. Considering this new evidence, to take this vaccine now constitutes a sin for me.

Dismissing this evidence as “misinformation” is disingenuous. As a Christian I am to view my body as the temple of the Holy Spirit and I am commanded, as a Christian, not to partake of activities or substances that could harm my body.

12. Looking back at what I did in receiving the COVID vaccines, I know it was a sin to do so, both because, as I will explain below, I believe receiving any of the COVID vaccines is a sin, and because it is a sin to know something is wrong, but to still do it anyways (“any person who knows what is right to do but does not do it, to him it is sin”: James 4:17).
13. Disobeying the Lord in this matter is, for me, a sin. I know this even more deeply than Christians who share my beliefs but have not received any of the COVID vaccines, because I *have* received two COVID vaccines and I have experienced the emotional and spiritual pain of that sin. I have been forgiven by Jesus for that sin, but it would grieve immensely both me and Him for me to repeat that sin.
14. I refuse to sin again in this matter. This time, I will not be coerced by Western University to sin against God, to violate my conscience, to defile the temple of God that is my body, to be complicit in the sin of abortion, or to be complicit in the oppression and vitiation of consent of my fellow students.

Foundational Beliefs of General Application to All of My Life, Including the Issue of the COVID Vaccines and Mandates to Receive Them

15. I steadfastly believe that “all scripture is God-breathed” (II Timothy 3:16-17), and it is through the Scriptures that God communicates His instructions and expectations, which are perfect and true for my life (Psalms 18:30). God desires and values obedience to His word, stemming from our love for Him, more than any religious ritual or sacrifice (1 Samuel 15:22; Hosea 6:6; Mark 12:32-33). 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 Bible-believing follower of Christ, my first loyalty is to Christ and His Word (the Bible), not to any particular Christian leader or their teachings. For this reason, my beliefs are exclusively grounded in scripture, which is the Word of God, and wholly independent of any philosophies, beliefs or doctrines of *any* congregational associations I may have.

Thus, for example, it is religiously irrelevant to me that some Christian teachers or leaders, even very important ones such as the Pope, have endorsed the COVID vaccines.

16. Out of love and obedience to God, I strive to live by the scriptures and “live a life worthy of the calling to which [I] have been called” (Ephesians 4:1), that is, a godly life reflective of the salvation gifted to me at Calvary.
17. 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 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).
18. God commands me to “take pains to have a clear conscience towards both God and man” (Acts 24:16), “desiring to act honourably in all things” (Hebrews 13:18) and warns me not to reject my conscience and thereby shipwreck my faith (1 Timothy 1:18-19). James, the brother of Christ, states it clearly: “any person who knows what is right to do but does not do it, to him it is sin” (James 4:17). Thus, I will not blindly conform to the rules, regulations or mandates of any country, state, principality, or institution but will first test everything to ensure it is within the will of God, and only when those rules align with God’s Law will I comply (Romans 12:2; 1 Corinthians 8:1-13).

Specific Beliefs Which Preclude Me from Receiving any Further COVID Vaccines

The known and unknown contents of the vaccines, and the manner in which they were produced

19. Fundamental to the Christian faith is the belief that all human persons bear the image of God (Genesis 1:27, 9:6). This has two applications relevant to the COVID vaccines.
20. 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 again injecting my body with substances such as those contained in the COVID vaccines. 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 toxic “spike protein” contained in the COVID vaccines is an obvious example. I am compelled to maintain both the physical and spiritual integrity of my body, including my divinely-designed cell mechanisms, and to not take unnecessary risks with my body. Doing otherwise is an expression of a lack of faith and a manifestation of putting my trust in man before God, when I am called to do the opposite. It is for this reason I do not take hard drugs, drink alcohol to excess, engage in high-risk thrill-seeking behaviour, permit my body to be used for medical experimentation, or engage in high-risk sexual behaviour.

21. 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). 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. (Exodus 20:13, Leviticus 18:21, 20:2-5, Deuteronomy 12:30-32, 18:10, 2 Kings 16:3, Psalm 16:38).
22. I understand and am aware that a new COVID vaccine has recently become available which Western purports is not implicated by the sin of Abortion (Novavax). However, the fact is, Novavax **is** implicated by abortion, as demonstrated in a peer-reviewed scientific paper published in October 2020 titled, *Structural analysis of full-length SARS-CoV-2 spike protein from an advanced vaccine candidate*. The cell line HEK293, notoriously derived from an aborted fetus, was used in the testing of the Novavax COVID vaccine.
23. Receiving any further COVID vaccines available in Canada would be to again violate this belief and commit a sin before God (James 4:17; Romans 14:23; Leviticus 20:1-5), as they were all developed from and/or researched or produced in a way that was

dependent on human fetal cell lines. It would implicate me in again endorsing an act that intrinsically asserts that human life is neither sacred nor valuable.

The deception surrounding the COVID vaccines

24. I sincerely believe the COVID vaccines are covered in deception. This is not merely or primarily a “political” or “personal” belief. It arises out of my Biblically-informed views and Holy Spirit-guided discernment. It is first and foremost a religious belief and is my religious belief.
25. The Holy Spirit is the third person of the Trinity (consisting of God the Father, the Son Jesus Christ, and the Holy Spirit). As Jesus said, he gave Christians the Holy Spirit, the “Spirit of Truth”, to guide and teach us (John 14:17, 26; 16:13). Part of being a Bible-following Christian is having, to the degree possible, the mind of Christ and being able to discern between what *appears* to be right and what *is actually* right (I Corinthians 2:14; I John 4:1; Colossians 2:8; Romans 12:2; Proverbs 9:10). The Bible says, and I believe, I must not be conformed to the ways of the world, but be transformed by the renewing of my mind based on God’s ways, which are above the ways of the world and the ways 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). As I believer, I am to test everything (1 Thessalonians 5:21).
26. Based on the discernment described above, I believe it is a deception that the COVID vaccines are as safe as Western and other institutions and authorities propagate them to be. I further believe it is a deception that the COVID vaccines are effective at preventing the spread and infection of the virus that causes COVID. These deceptions form the purported rationale for COVID vaccine mandates.
27. As a Christian, I am called to live according to truth and not be complicit in deceit (John 4:23; I John 3:18 and 4:1; John 8:32; I Peter 3:10; Psalms 5:6 and 101:7; Proverbs 9:10, 12:17, 14:8, 19:9, and 20:17; II Timothy 3:13; and Colossians 2:8 and 3:9). Walking in the light and truth of Jesus and shunning all lies and deceit is fundamental to my walk with the Lord. I cannot receive any further COVID vaccines and thereby knowingly participate in deceit, which would be to walk in darkness.

28. Further, 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 again received any 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 again received a COVID vaccine, I would be again 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).

The injustice and immorality of coercion

29. 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 to Christ, I am called to resist oppression and vitiation of consent, which necessarily includes coercive vaccination programs, whether at the hands of government or private entities (Ephesians 5:11).
30. If I were to again submit to a COVID vaccine mandate such as Western’s, I would be an endorser of oppression and injustice, acting in hate and spite of God, my neighbours, and even myself. Once discriminatory and oppressive policies are normalised in peoples’ hearts and minds, freedom ends, mass atrocities begin, and evil reigns. I must abstain from all evil (I Thessalonians 5:22-23).
31. I believe, as a Christian, it is morally wrong and sinful to take away the *free* choice of something as important as what people put into their bodies. I care deeply about matters of free will and consent. I believe all human beings have the divine right to exercise free will, as established by God long before the creation of the State (Deuteronomy 30:19; Joshua 24:15; Revelation 3:20). Jesus gives people free will and lets them choose

whether they will follow Him in love, or live for themselves. Conversely, Satan uses coercive, extortionary, forceful, manipulative, and deceitful tactics to make people comply with his directives (Genesis 2; Matthew 4:1-11; Job 1:6-22).

32. By their very nature, COVID vaccine mandates are irrefutably coercive and extortionary in nature. The entire impetus for such mandates is to withhold something important from someone until that person does something they will not voluntarily do and would not do otherwise. These tactics reflect the darkness and bondage of Satan, not the light and freedom of Jesus. They are the tactics of those who are controlled by fear and therefore seek to control the actions of others so as to selfishly create for themselves the illusion of their own safety.
33. Obtaining an advanced education is no mere luxury or leisure activity. It is often required for full participation in society and the economy, and is certainly required to fulfil dreams to enter a particular vocation. Some may call it a “choice” to “choose” between a post-secondary education and injecting unwanted substances into one’s body, but my definition of choice is not so ethically and morally bankrupt. I concur with the 1992 comments of former Justice La Forest of the Supreme Court of Canada:

“A man cannot be said to be ‘willing’ unless he is in a position to choose freely; and *freedom of choice predicates the absence from his mind of any feeling of constraint interfering with the freedom of his will.*” A “feeling of constraint” so as to “interfere with the freedom of a person’s will” can arise in a number of situations *not* involving force, threats of force, fraud or incapacity.

...

Professor Klippert in his book *Unjust Enrichment* (1983) refers to the doctrines of duress, undue influence, and unconscionability as “justice factors.” He lumps these together under the general term “*coercion*” and states..., “In essence the common thread is *an illegitimate use of power or unlawful pressure which vitiates a person’s freedom of choice.*”¹

¹ *Norberg v Wynrib*, [1992] 2 S.C.R. 226, at paragraphs 27-28 [emphasis added].

Conclusion

34. I have prayed about the above beliefs as they apply to the COVID vaccine and associated mandates and I have received confirmation from the Holy Spirit that it is the Lord's Will for me to act in accordance with these beliefs in rejecting all further COVID vaccines. I sincerely believe that if I received any more COVID vaccines, I would commit a sin before God.

35. I affirm the above statements are true.

A handwritten signature in black ink that reads "Aidan Haskell". The signature is written in a cursive style and is positioned above a horizontal line.

Aidan Haskell

Date: October 24th 2022