



Supreme Court file no. KEL-S-S-136195
Kelowna Registry
Affidavit #1 of Nadia Podmoroff
Affirmed the 13 day of July, 2023

In the name of Yahveh (God)

In the Supreme Court of British Columbia

Between:

City of Kelowna,

Petitioner,

-v-

Unknown Persons Operating as "Common Law Education and Rights", David Lindsay,
John Doe, Jane Doe, and Persons Unknown,

Respondents.

Affidavit of Nadia Podmoroff
Affirmed this 13 day of July, 2023

I, Nadia Podmoroff, of Winlaw, in the Province of British Columbia,

affirm and say that:

1. I, Nadia Podmoroff, am one of the Persons Unknown or Jane Doe Respondents and a woman affected by the relief sought in this case, and as such have personal knowledge of the facts herein deposed to by me, except where same is stated to be based on information and belief, in which case I do verily believe same to be true.
2. I'm presently 60 years old and I am a retired licensed primary care paramedic, retired licensed community paramedic and retired Dr. of Traditional Chinese Medicine and licensed acupuncturist.
3. I have been employed with the B.C. Ambulance Services for over 20 years until the start of the COVID-19 situation in 2020.
4. My much loved career abruptly ended in 2020, when I was instructed by my employer that my employment duties would soon include vaccinating the general public with the experimental MNRA COVID vaccine. I refused to carry out these instructions because I was given no list of ingredients, no list of contraindications and no list of safety studies to demonstrate its effectiveness, safety and associated risks.
5. Because of my refusal to inject people with this experimental injection, my employer confirmed that I would face termination of employment.
6. Rather than be terminated, I upheld my oath of "*First do no harm*" and applied for an early retirement.

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7. I was then forced to sell my home which I could no longer afford without an income.
8. In response to the orders and mandates from all public health officials and governments at all levels, I began to coordinate and speak out at freedom rallies in the Central Kootenays and at times in Kelowna.
9. All freedom rallies I've attended in the Central Kootenays and Kelowna occurred in areas of high visibility where passerby's were welcomed to join in and many newcomers often did. All were peacefully attended and I never witnessed any violence at any time.
10. I attended these protests for a variety of reasons, including to learn from others, socialize, network and share beliefs and information with diverse people.
11. It was at freedom rallies in the Kootenays and in Kelowna where I formed meaningful long-term friendships and support groups with David Lindsay and members of C.L.E.A.R as well as other health care workers, first responders, business owners, parents and people from all walks of life; many who had also lost their careers due to government mandates; all who like myself, felt a need to publicly show peaceful dissent to the unjustified government over reach and restrictive measures. It was at many rallies at visible public locations like Stuart Park, where I heard passerby's say, *"I'm so glad I found you"...**"Finally, I feel like I'm not alone"*.
12. I have traveled to Kelowna regularly to participate at freedom protests. I have spoken at these protests on several occasions and expressed on stage what life could look like if freedoms are lost by sharing my ancestral history of pacifism which resulted in the loss of residence, persecution, torture, starvation and/or death of thousands of Doukhobors in Russia in the late 1800's and early 1900's.
13. I have also shared some of the peaceful activities we have carried out in the Kootenays in relation to our increasing loss of freedoms, restrictive COVID measures and experimental vaccines. Most recently, I also spoke about the B.C. Climate Action plans which could pose severe economic consequences for businesses, farmers and home and land owners with possible bankruptcy and loss of residence if mandated through cities' official community plans.
14. Other concerns related to the plan which I spoke about included potential limited personal transportation and mobility, unaffordable renovations to homes and businesses, inadequate grid infrastructures to meet increased grid demands and increased restrictive surveillance and control.
15. I requested to the people of Kelowna at these protests, that they consider attending regular city council meetings to learn more about their climate action plan and official community plan and consider lobbying their local government officials and city planners to reduce impacts and to achieve mutually benefiting outcomes for everyone.
16. It is important to me that our Charter rights and freedoms, which include freedom of speech and peaceful assembly continue to be upheld in public parks and spaces in Kelowna and throughout our country so that citizens can continue to peacefully show dissent to oppressive government measures and over reach. I do not want my family and friends to live through what my grandparents lived through, which underscores my activities at these protests for peaceful opposition to many of our unconstitutional government actions.
17. I have been an organizer of protests against the lockdowns and restrictions in relation to COVID-

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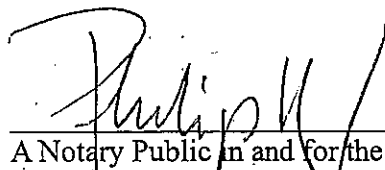
19 throughout the Kootenay region from Cranbrook to Castlegar. I am deeply concerned about the consequences of an adverse decision banning the rallies from downtown Kelowna and the impacts which could result in Kelowna and in other communities across our province and country, including the B.C. Interior and Kootenay regions. Democracy can only be maintained when our Charter rights and freedoms are protected and upheld.

- 18. David Lindsay informs me and I do verily believe same to be true, that all of the locations where he has organized their protests and street marches, both of which I have participated in, were in downtown Kelowna, due to the large number of people, and the strategic location of most of the government and media locations in that area.
- 19. Considering that our shared protest messages, including my own, are directed and targeted to these entities and people working for them, I am further concerned that banning these protests and marches from downtown Kelowna will greatly reduce my effectiveness in being able to convey my opposition, and that of all other protestors, to the actions of these entities and people.
- 20. I do not believe we can be effective at all, or on a greatly reduced level, if we cannot protest outside the very buildings, governments and people we are protesting directly against, nor to being denied our ability to show the public what are beliefs are and reasons for our actions, which the street marches very much provide for.
- 21. I am further concerned about the ongoing and upcoming threats to our privacy and other rights and freedoms from various measures being imposed by our governments in Canada. My concerns have motivated me to be extra vigilant and outspoken on an ongoing bases before as many people as I can. I fear that banning these rallies from downtown Kelowna could trigger other cities and towns to follow suit, which could deny me my freedom to publicly speak on an effective basis.
- 22. I make this Affidavit true and correct, supporting Freedom Rallies at Stuart Park in Kelowna, B.C., and in support of my opposition to the Petition, and for no improper purpose.

Affirmed before me this 13 day of July, 2023 }
at the City of CASTLEGAR in the Province }
of British Columbia }



Nadia Podmoroft



A Notary Public in and for the Province of British Columbia

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The City of Kelowna

v

David Lindsay, *et al*
Respondents

Supreme Court file no. KEL-S-S-136195

Kelowna, B.C. Registry

Proceedings commenced at Kelowna, B.C.

Affidavit of Nadia Podmoroff

David Kevin Lindsay

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