

Statement setting out grounds for review

From: Jakki Jeffs <aflo@mgl.ca>

Sent: Tuesday, October 24, 2023 12:42:04 PM

To: Laura Mousseau <Laura.Mousseau@guelph.ca>

Cc: Mayors Office <Mayor@guelph.ca>

Subject: Re: Guelph Ads 3 and 5 refused by Manager, Strategic Communications City of Guelph

Dear Laura Mousseau,

The Guelph and Area Right to Life board has requested and received an informal legal opinion that the concern with Ad #5, mentioned in the August 9th 2023 response regarding "*The City's obligations under Ontario law include not publishing defamatory content.*" Does not apply because we have named no specific person or entity and have not referred to nor mis-represented any statement from an individual or entity. The add is purely information for women that the abortion-pill reversal procedure is available in Canada.

Regarding the response on August 16th 2023 with relation to Guelph ad #3, the fact that two medical bodies with "abortion right"-affirming positions have made statements that abortion pill reversal "*is not supported by science*" is unsurprising, however, totally irrelevant when considering Ad #3, given the scientific evidence supporting abortion-pill reversal. We would also remind the City, that licensed obstetricians and gynecologists as well as licensed physicians, support this method of providing a second choice for women.

As mentioned over 4,000 mothers, including Canadian mothers have their child in their arms because of the abortion-pill reversal method, despite efforts to prevent women knowing that this method is safe, effective, and available. We believe that informed consent is a priority and that women have a right to the knowledge that this method is available, hence our wording in Ad #3. We will leave further discussion on other comments regarding both Ad #3 and Ad#5 for future correspondence.

On behalf of our board and members, I respectfully request that we be provided with contact for the individual holding a senior position to that of Strategic Communications Manager for further discussion.

Sincerely

Jakki Jeffs

FW: Guelph Ads 3 and 5 refused by Manager, Strategic Communications City of Guelph

Jakki Jeffs <aflo@mgl.ca>

to Jakki, Laura, me, chris

September 11th 2023

Good afternoon, Laura Mousseau ,Manager Strategic Communications, Mayor Guthrie and Guelph City Councillors,

Please find below our response to three emails of communication from Laura Mousseau, regarding our request for ad space for bus ads 3 and 5 which were submitted within a total of five, to Guelph Transit via Streetseen Media to Guelph Transit in June 2023. We would appreciate a response at your earliest convenience. Our Association is made up of people from all walks of life, faith, or no faith, young and old, those living with disability and the able-bodied as well as all nationalities and our advertising expresses factual information and our educated opinions, which we wish to share with our community at large.

Sincerely,

Jakki

Mrs Jakki Jeffs
President
Guelph and Area Right to Life Association
Home 519 821 9604
Cell 519 820 3399

- 1) **Laura Mousseau email dated August 9th2023 to Chris Ottmann - 3.21pm Ad #3 “Regret taking the 1st abortion pill? You can have a second chance” www.abortionpillreversal.ca 1 888 612 3960 (direct line to medical team at abortion pill rescue)**

“The City approves GARTL ads 1 and 2 but GARTL bus ad 3.pdf cannot be approved as is as it presents some legal concerns for the City”

- 2) **Laura Mousseau email regarding dated August 16th 2023 to GARTL – 5.24pm Ad#3**

“The ad in question directs people to a website that provides information that could be construed as medical advice, and the subject matter of which both the Society of Obstetricians and Gynecologists of Canada and the American College of Obstetricians and Gynecologists have issued statements asserting that abortion pill “reversal” is not supported by science.

Similar to our rationale for not approving the other ad making claims about a legal and Health Canada approved treatment, there are also legal risks to the City in allowing this information to be promoted on City property.”

<https://www.canada.ca/en/health-canada/services/drugs-health-products/regulatory-requirements-advertising/health-product-advertising-complaints.html#p2>

- **Complaint regarding AFLO website Abortionpillreversal.ca and Abortion Pill Rescue**

Complaints have been made regarding the AFLO abortionpillreversal.ca website from those who oppose our message, they have been dealt with by Health Canada and as you will note, the site bore the scrutiny. The questions in the section Complaint Regarding abortionpillreversal.ca were posed by a senior reporter of a national newspaper who had interviewed Jakki Jeffs in her position as executive director of Alliance for Life Ontario, she is also the author of many independent articles, compilation and research on the website. Jakki had received approval regarding the content from medical professionals, as to its accuracy and authenticity prior to making the website public. As you will note Health Canada rejected both complaints.

- 2020 2 24 “explanatory note sent”

“ Q1. The department's health products advertising incidents page indicates that there were [two complaints in December](#) against Alliance for Life Ontario for promoting a process, using progesterone, to supposedly reverse the effects of medical abortion, or so-called abortion pills. The site indicates that "Compliance verification ongoing; Health Canada is assessing the issue." Can you state where the review of these complaints stands, and when it might be resolved?

Q3. Your site also indicates [another complaint](#) was lodged earlier last year against something called Abortion Pill Rescue, which I believe is a U.S. group, promoting the same procedure. It says that an "explanatory letter" was sent to them. Can you explain what that means, exactly, and what concerns if any Health Canada had about their actions?

A1&3. The [Food & Drugs Act](#) defines advertisement as including any representation by any means, for the purpose of promoting directly or indirectly the sale of a drug. The abortion pill reversal is described as a treatment intended to reverse the effects of the abortion pill. It is a **treatment protocol** followed by health care professionals, which would involve progesterone.

*As such, it is Health Canada's position that advertisements of the abortion pill reversal are intended to promote the **medical treatment protocol** for reversing the effect of abortion pill, rather than for the promotion of a specific drug such as progesterone....."*

The information on www.abortionpillreversal.ca is accurate, and for information only in order that women have the knowledge of a second chance at choice, this time for physicians to try to save their baby after they had taken the first pill in the Mifegymiso abortion regimen. Women have the right to know that information whether or not the SOGC or the ACOG approve. Growing numbers of obstetricians and family doctors are willing being trained in this simple procedure using a drug that has been used for decades in the management of miscarriage.

- **As far as the abortion pill reversal not being scientifically supported, please see the following. We would posit that 4,000 babies, including Canadian babies who are alive and thriving, proof enough even without the evidence referenced below. The research is ongoing and some can be found at www.stenoinstute.org**

[Healthy Outcomes](https://www.heartbeatinternational.org/our-work/apr) - Abortion Pill Reversal

<https://www.heartbeatinternational.org/our-work/apr>

The protocol used in the Abortion Pill Reversal process is nothing new. In fact, progesterone has been used routinely and safely with pregnancy since the 1950s. [1](#), [2](#), [3](#), [4](#), [5](#), [6](#)

A 2018 peer-reviewed study showed positive results

- **64%-68% of the pregnancies were saved through Abortion Pill Reversal**
- **There was no increase in birth defects**
- **Lower preterm delivery rate than the general population**

1. [Vaux NW and Rakoff AE: Estrogen-progesterone therapy: A new approach in the treatment of habitual abortion. Am J Obst Gynec 50:353, 1945.

2. Jones, GES: Some newer aspects of the management of infertility. JAMA 141:1123, 1949.] [↪](#)

3. [Progesterone support in pregnancy has been in use for nearly 60 years, having received its start with publications dating back to the 1940s.] (<https://www.naprotechnology.com/progesterone.htm>)

4. [Progesterin Therapy to Prevent Preterm Birth: History and Effectiveness of Current Strategies and Development of Novel

Approaches] <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6766339/>

5. [The Use of Progesterone for Prevention of Preterm Birth]

https://www.researchgate.net/publication/5653589_The_Use_of_Progesterone_for_Prevention_of_Preterm_Birth

6. [The history of natural progesterone, the never-ending story]

<https://tahomaclinic.com/Private/Articles1/BHRT/Piette%202018%20-%20The%20history%20of%20natural%20progesterone,%20the%20never-ending%20story.pdf>

https://www.heartbeatinternational.org/images/ImpactReports/APRN_Impact_Report_2022.pdf

2022 Impact report 4,000 lives saved via abortion pill reversal

We are unsure as to what legal risks the city would be facing and would appreciate a more in-depth explanation of the “legal risks” of running a truthful ad.

3) Laura Mousseau email August 9th 2023 3.09pm bus ad #5

*“In response to your request for more information about the City’s decision to refuse “GARTL bus ad 5.pdf” from being shown on City property, the City’s [Advertising Acceptability Policy](#) specifies that all advertising must comply with applicable law and with the requirements of the Code of Advertising Standards except where the latter conflicts with applicable law. The City’s obligations under Ontario law include **not publishing defamatory content.**”*

*Pharmaceuticals authorized to be prescribed in Canada are subject to rigorous and ongoing specialized scientific review by highly qualified scientists working for Health Canada. Given that your proposed advertisement states or implies that pharmaceuticals which are currently legally prescribed in Canada for medical abortion are unsafe, **it impugns both the manufacturer and the approval authority (and possible also prescribing physicians and pharmacists).** Without very compelling evidence, the City cannot permit a statement that **“Legal ≠ Safe” to appear on a City bus; that statement is not supportable and the publication of injurious falsehoods is prohibited by law.**”*

We’re mindful of the right to freedom of expression and have expressly considered it in this case. However, the Supreme Court of Canada has confirmed that the law of defamation remains applicable as a reasonable and justifiable common law limit on expression. As such the City ~~is~~ remains compelled to refuse this advertisement in the form and with the words proposed.

*I’d also like to note that the City’s current Advertising Acceptability Policy is being updated and will be presented to Council on September 6, 2023. Staff’s recommended updates to the Policy are aligned with the Divisional Court decision of January 2023 in *Guelph and Area Right to Life v. Guelph (City)* with which I expect you’re familiar.*

You're welcome to share any additional information and evidence in support of the ad in question, or to provide a different ad for consideration. "

- **We bring to your attention to the fact that Canada has licensed at least two drugs thought to be legal and safe that have eventually had to be withdrawn from the market by Health Canada, because of dreadful tragedies which have accompanied their use. We note that it was a "stubborn Canadian" Frances Kelsey, who was credited with saving thousands of US babies from the birth defects caused by Thalidomide.**

Thalidomide

<https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/fact-sheets/fact-sheet-thalomid-authorization-sale-canada.html>

Pr THALOMID® is the brand name of thalidomide sold by Celgene Corporation. Thalidomide was originally sold during the late 1950s and 1960s as a sleeping aid and to treat morning sickness in pregnant women. In 1960-61, it was found to cause birth defects, especially if taken during the first 25-50 days of pregnancy. Around 12,000 babies in 46 countries were born with birth defects, with only some 8,000 surviving past their first birthday. In 1962, thalidomide was withdrawn from the market by regulators around the world.

<https://www.utoronto.ca/news/u-t-expert-why-we-need-answers-thalidomide-tragedy-ensure-drug-safety-now>

"In 2015, after decades of fruitless lobbying, Canadian survivors of thalidomide [finally received compensation from the federal government](#)"

<https://nationalpost.com/news/canada/how-a-stubborn-canadian-saved-thousands-of-american-babies-from-birth-defects>

"In 1962, Kelsey gave this staid assessment of the bureaucratic decision that staved off a human catastrophe: "They (Merrell) certainly thought I was unreasonable, but I didn't feel the material to back it up was very adequate."

Vioxx

<https://www.cmaj.ca/content/172/1/5>

The drug was originally approved by the FDA (and Health Canada) in 1999, despite evidence in the original clinical trials of a nonstatistically significant increase in risk of cardiovascular events and despite the known potential for cardiovascular events associated with any drug that interferes with cyclooxygenase-2 ...Jan 4, 2005

<https://www.canada.ca/en/health-canada/services/drugs-health-products/regulatory-requirements-advertising/health-product-advertising-complaints.html#p2>

“2004-50 September 30, 2004 For immediate release ADVISORY OTTAWA - Health Canada is informing Canadians of the worldwide voluntary withdrawal of Vioxx® by Merck & Co., as announced today by the company. Merck & Co will be removing the product from the market due to new information that indicates an increased risk of cardiovascular events such as heart attacks and strokes.....”

<https://www.canada.ca/en/news/archive/2004/09/health-canada-informs-canadians-vioxx-withdrawal-merck-co.html>

Canadians are free to express their opinions on how public institutions are run if they wish, however Guelph bus ad #3 as submitted, stated the following, “ Regret taking the abortion pill. You can have a second chance” This statement is true and is intended to inform women that they do have a second chance at choice, which has been scientifically proven safe and has a 64-68% chance of success. We believe women have a right to know that information. How this wording gave rise to the issues stated by Laura Mousseau, we have no comprehension. For clarity’s sake we have provided some quotes from our Canadian Government’s own document regarding the Canadian Charter sec.2(b) rights as accessed online.

We bring your attention to the link, from which the following quotes originate. We have taken the liberty of quoting all the **binding** documents mentioned in the “See also” section under “Purpose” and highlighted what we believe are extremely important sections for the Communications Department, the Mayor and Guelph City Councillors to note.

The wonderful thing about living in a Democracy such as Canada, is the great importance our country and its judiciary place on *Freedom of*

Expression when it concerns governments at every level, which are bound to act in accordance, at all times, and in all decisions with the Canadian Charter of Rights and Freedoms, in their interactions with the community and others. This of course is a great guide and protection for the Governments concerned and their citizens, especially in situations such as the request to run ads #3 and #5 as already submitted.

<https://www.justice.gc.ca/eng/csj-sjc/rfc-dlc/ccrf-ccdl/check/art2b.html>

Government of Canada – Canada’s Justice System

The Canadian Charter of Rights and Freedoms – Section 2(b)- Freedom of Expressions

“Provision

2. *Everyone has the following fundamental freedoms:*

b) *freedom of thought, belief, opinion and expression, including freedom of the press and other media of communication*

Similar provisions

Similar provisions may be found in the following Canadian laws and international instruments binding on Canada: sections 1(d) and (f) of the Canadian Bill of Rights; article 19 of the International Covenant on Civil and Political Rights; article 13 of the Convention on the Rights of the Child; article 5(d)(viii) of the Convention on the Elimination of All Forms of Racial Discrimination; article 21 of the Convention on the Rights of Persons with Disabilities; article IV of the American Declaration of the Rights and Duties of Man.

See also the following international, regional and comparative law instruments that are not binding on Canada but include similar provisions: article 19 of the Universal Declaration of Human Rights; article 10 of the European Convention for the Protection of Human Rights and Fundamental Freedoms; article 13 of the American Convention on Human Rights; the First Amendment of the American Constitution.

Purpose

The protection of freedom of expression is premised upon fundamental principles and values that promote the search for and attainment of truth, participation in social and political decision-

making and the opportunity for individual self-fulfillment through expression (Irwin Toy Ltd. v. Quebec (Attorney General), [\[1989\] 1 S.C.R. 927](#) at 976; Ford v. Quebec, [\[1988\] 2 S.C.R. 712](#) at 765-766).

The Supreme Court of Canada has maintained that the connection between freedom of expression and the political process is “perhaps the linchpin” of section 2(b) protection (R. v. Keegstra, [\[1990\] 3 S.C.R. 697](#); Thomson Newspapers Co. v. Canada (A.G.), [\[1998\] 1 S.C.R. 877](#); Harper v. Canada (Attorney General), [\[2004\] 1 S.C.R. 827](#)]

Free expression is valued above all as being instrumental to democratic governance. The two other rationales for protecting freedom of expression — encouraging the search for truth through the open exchange of ideas, and fostering individual self-actualization, thus directly engaging individual human dignity — are also key values that animate section 2(b) analysis.
My emphasis.

Analysis

Canadian courts have interpreted section 2(b) very broadly, often finding a prima facie breach easily.....”

“include **not publishing defamatory content.**”

We bring your attention to the following link; <https://tailorlaw.com/defamation-law-in-ontario/>

Having read the above information, and several other articles from both provincial and federal perspectives, regarding defamation, we are extremely perplexed as to how we might be accused of defamation, our statement is true, does not directly name any institution or individual.

“*The Abortion Pill. Safe? With 4x higher incidence of adverse events compared to surgical abortion. Legal ≠ Safe*”. The link below remains the largest comparison of women who underwent chemical rather than surgical abortion. The results are as copied below, the data taken from the Finnish Government databank.

One may decide it is of no consequence, but that is not our opinion. We believe that women have the right to know what risks they are undertaking when they are considering the Mifegymiso abortion regimen . As far as we know this data has not been disputed anywhere in the world, possibly disregarded, but not disputed.

- <https://pubmed.ncbi.nlm.nih.gov/19888037/>

“Results: The overall incidence of adverse events was fourfold higher in the medical compared with surgical abortion cohort (20.0% compared with 5.6%, $P<.001$). Hemorrhage (15.6% compared with 2.1%, $P<.001$) and incomplete abortion (6.7% compared with 1.6%, $P<.001$) were more common after medical abortion. The rate of surgical (re)evacuation was 5.9% after medical abortion and 1.8% after surgical abortion ($P<.001$). Although rare, injuries requiring operative treatment or operative complications occurred more often with surgical termination of pregnancy (0.6% compared with 0.03%, $P<.001$). No differences were noted in the incidence of infections (1.7% compared with 1.7%, $P=.85$), thromboembolic disease, psychiatric morbidity, or death.”

“Legal ≠Safe

“that statement is not supportable and the publication of injurious falsehoods is prohibited by law”.

We refer you back to the information on Thalidomide and Vioxx, which were both considered legal and safe, but turned out not to be. Also please see the studies below. We have very little information regarding Canada as there appears to be no will to keep it, but these concerns are very real and impact women undergoing induced chemical abortion and we believe women have a right to know this information. Chemical abortion also appears to be the method of choice for human sex traffickers which raise a whole other area of concern for us and we believe for society. The original Health Canada safety guidelines were very strict in regard to this method of abortion, but pressure from the abortion industry and advocates have seen every safeguard removed, not because the method is safe, but because of pressure.

- **Please see a list of adverse events already experienced in Canada, by women who have used Mifegymiso and which have been noted by Health Canada Adverse event reports. <https://abortionpillreversal.ca/abortion-pill-health-risks/>**

- Please note the original Health Canada safety guidelines, <https://abortionpillreversal.ca/what-is-the-abortion-pill/>
- Please also note that a new study shows that almost 70% of abortions are “unwanted” <https://www.printfriendly.com/p/g/8Hr2pE>

1) **Increased ER Visits**

“The abortion industry claims that abortion pills are safe. Yet peer-reviewed science and data say otherwise. Research shows the rate of abortion pill-related emergency room visits has increased more than 500% over the past decade and a half, and that abortion pills put mothers at significantly greater risk for complications.”

https://lozierinstitute.org/abortion-drug-facts/?utm_campaign=cultivation&utm_medium=email&hsmi=270850209&hsenc=p2ANqtz-8tTg_br7jPowM-osHmBD-n96BfBXmllnXyZYT3ZA6uOjYR2ff9geTdNoNdZlumdhEsq99lhPWGgKrospAUbW-OoFJ1ow&utm_content=uneng&utm_source=housefile#introduction

- 2) In summary, even though mifepristone-induced abortions have been used in the United States for over 20 years, there have been no randomized trials to systematically investigate its immediate, short, mid-, and long-term risks. Indeed, even though Surgeon General C. Everett Koop recommended a five-year longitudinal study to investigate abortion’s risks and benefits as far back as 1989, that research was opposed by abortion advocates and has still not been undertaken. The failure of abortion providers to support and undertake prospective longitudinal studies of a nationally representative sample of women contributes to our belief that the ideological biases of abortion providers have led to a combination of disinterest, willful ignorance, or even a conspiracy to hide the widespread dangers of unwanted and contraindicated abortions. This ignorance advances the interests of population control zealots, sex traffickers, and sexual predators. But it is a nightmare for the women placed at increased risk of unwanted, unnecessary, and unsafe legal abortions. If the FDA’s goal is to protect women’s health, the REMS for mifepristone should be expanded to ensure better data collection, not further weakened or eliminated.

<https://lozierinstitute.org/overlooked-dangers-of-mifepristone-the-fdas-reduced-rems-and-self-managed-abortion-policies-unwanted-abortions-unnecessary-abortions-unsafe-abortions/>

- 3) In Canada, one woman died during the chemical abortion trials.

<https://www.ncregister.com/news/woman-dies-in-canadian-abortion-pill-testing>

- 4) Midegymiso Monograph

https://pdf.hres.ca/dpd_pm/00050659.PDF

- 5) Concerns raised by professionals and organizations

<https://www.liveaction.org/wp-content/uploads/2020/07/FDALetter.pdf>

- 6) Canadian teenager dead at 19 after the abortion pill July 4th 2022. She died of Septic shock and is listed as # 001010083 in the attached screenshot.
file:///Users/aflo/Downloads/2023-09-08_exportPDF.pdf
- 7) Chemical abortion patients concealing this information from E.R physicians heightens their risks.

Results

Chemical abortion patients whose abortions are misclassified as miscarriages during an ER visit subsequently experience on average 3.2 hospital admissions within 30 days. 86% of the patients ultimately have surgical removal of retained products of conception (RPOC). Chemical abortions are more likely than surgical abortions (OR 1.80, CL 1.38-2.35) to result in an RPOC admission, and chemical abortions concealed are more likely to result (OR 2.18, CL 1.65-2.88) in a subsequent RPOC admission than abortions without miscoding. Surgical abortions miscoded/concealed are similarly twice as likely to result in hospital admission than those without miscoding.

Conclusion

Patient concealment and/or physician failure to identify a prior abortion during an ER visit is a significant risk factor for a subsequent hospital admission. Patients and ER personnel should be made aware of this risk.

<https://journals.sagepub.com/doi/full/10.1177/23333928221103107>

<https://abortionpillreversal.ca/abortion-pill-health-risks/>

We believe that there is enough evidence to support our opinion as expressed in Guelph bus ads #3 and #5

“We’re mindful of the right to freedom of expression and have expressly considered it in this case”

We believe that the communications department appears not to have been mindful enough of our Charter Rights and since it appears to us that no reasonable deduction would define them as defamation, we cannot begin to understand why ad #5, or number 3

ad were refused and list the following for your further consideration. I did try to access the new “Advertising Guidelines”, but it seems Council did not have this item on the September 6th 2023 agenda. I look forward to reading the guidelines when they have passed Council members’ scrutiny. I apologise for the length of this correspondence, but I must admit to a little frustration in having to continually defend the messages in our advertising. We are people of honour and truthfulness and we have a worldview that believes women have a right to know all the information necessary to make an informed choice and that assistance and support are better than our society offering induced abortion. We take pains to research everything that we state in all communications, and especially when we are advertising, to ensure accuracy. While many may disagree with our worldview on life issues, it is our contention that we have a right to express them in the way any other law-abiding organization may do so on Guelph Transit.

We have quoted extensively from documents which we believe support our right to have these ads accepted on Guelph Transit, and encourage your perusal of them directly below immediately and after my contact information.

“It seems that the rights enshrined in Section 2(b) should therefor only be restricted in the clearest circumstances. The purpose of the guarantee is to permit free expression to the end of promoting truth, political or social participation, and self-fulfillment. The purpose extends to the protection of minority beliefs, which the majority regard as wrong or false. Tests of free expression, frequently involve a contest between the majoritarian view of what is true or right and an unpopular minority view. As Holmes J. stated over sixty years ago, the fact that a particular content of a person’s speech might “excite popular prejudice” is no reason to deny it protection, for, if there is any principle of the Constitution that more imperatively calls for attachment than any other it is the principle of free thought – not free thought for those who agree with us, but freedom for the thought we hate”

Court of Queens Bench of Alberta October 29 2020 Lethbridge and District Pro-Life Association and the City of Lethbridge Page 18

[https://www.canlii.org/en/ab/abqb/doc/2020/2020abqb654/2020abqb654.html?autocompleteStr=LETHBRIDGE%20AND%20DISTRICT%20PRO-LIFE%20ASSOCIATION%20V%20LETHBRIDGE%20\(CITY\)%2C%20&autocompletePos=1](https://www.canlii.org/en/ab/abqb/doc/2020/2020abqb654/2020abqb654.html?autocompleteStr=LETHBRIDGE%20AND%20DISTRICT%20PRO-LIFE%20ASSOCIATION%20V%20LETHBRIDGE%20(CITY)%2C%20&autocompletePos=1)

“It is difficult to imagine a guaranteed right more important to a democratic society than freedom of expression. Indeed, a democracy cannot exist without the freedom to express new ideas and to put forward opinions about the functioning of public institutions. The vital importance of the concept cannot be over-emphasized...” page 18

[https://www.canlii.org/en/ab/abqb/doc/2020/2020abqb654/2020abqb654.html?autocompleteStr=LETHBRIDGE%20AND%20DISTRICT%20PRO-LIFE%20ASSOCIATION%20V%20LETHBRIDGE%20\(CITY\)%2C%20&autocompletePos=1a](https://www.canlii.org/en/ab/abqb/doc/2020/2020abqb654/2020abqb654.html?autocompleteStr=LETHBRIDGE%20AND%20DISTRICT%20PRO-LIFE%20ASSOCIATION%20V%20LETHBRIDGE%20(CITY)%2C%20&autocompletePos=1a)

Sincerely,

Jakki Jeffs
President Guelph and Area Right to Life Association
518 821 9604 home or cell at 519 820 3399

Canadian Bill of Rights

S.C. 1960, c. 44

Assented to 1960-08-10

An Act for the Recognition and Protection of Human Rights and Fundamental Freedoms

Preamble

The Parliament of Canada, affirming that the Canadian Nation is founded upon principles that acknowledge the supremacy of God, the dignity and worth of the human person and the position of the family in a society of free men and free institutions;

Affirming also that men and institutions remain free only when freedom is founded upon respect for moral and spiritual values and the rule of law;

And being desirous of enshrining these principles and the human rights and fundamental freedoms derived from them, in a Bill of Rights which shall reflect the respect of Parliament for its constitutional authority, and which shall ensure the protection of these rights and freedoms in Canada:

Therefore, Her Majesty, by and with the advice and consent of the Senate and House of Commons of Canada, enacts as follows:

PART I Bill of Rights

Marginal note: Recognition and declaration of rights and freedoms

1 It is hereby recognized and declared that in Canada there have existed and shall continue to exist without discrimination by reason of race, national origin, colour, religion or sex, the following human rights and fundamental freedoms, namely,

- (a) the right of the individual to life, liberty, security of the person and enjoyment of property, and the right not to be deprived thereof except by due process of law;
- (b) the right of the individual to equality before the law and the protection of the law;
- (c) freedom of religion;
- (d) freedom of speech;
- (e) freedom of assembly and association; and
- (f) freedom of the press.

Part II

Marginal note:Savings

- 5 (1) Nothing in Part I shall be construed to abrogate or abridge any human right or fundamental freedom not enumerated therein that may have existed in Canada at the commencement of this Act.
- Marginal note:"Law of Canada" defined

(2) The expression "law of Canada" in Part I means an Act of the Parliament of Canada enacted before or after the coming into force of this Act, any order, rule or regulation thereunder, and any law in force in Canada or in any part of Canada at the commencement of this Act that is subject to be repealed, abolished or altered by the Parliament of Canada.

- Marginal note:Jurisdiction of Parliament

(3) The provisions of Part I shall be construed as extending only to matters coming within the legislative authority of the Parliament of Canada

<https://laws-lois.justice.gc.ca/eng/acts/c-12.3/page-1.html>

International Covenant on Civil and Political Rights

Article 19

1. Everyone shall have the right to hold opinions without interference.
2. Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers,

either orally, in writing or in print, in the form of art, or through any other media of his choice.

3. The exercise of the rights provided for in paragraph 2 of this article carries with it special duties and responsibilities. It may therefore be subject to certain restrictions, but these shall only be such as are provided by law and are necessary:

(a) For respect of the rights or reputations of others;

(b) For the protection of national security or of public order (ordre public), or of public health or morals.

<https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>

Convention on The Rights of the child

Article 13

The child shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of the child's choice.

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

International Convention on the Elimination of All Forms of Racial Discrimination Article 5 (d) (viii)

Article 5

In compliance with the fundamental obligations laid down in article 2 of this Convention, States Parties undertake to prohibit and to eliminate racial discrimination in all its forms and to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law, notably in the enjoyment of the following rights:

(a) The right to equal treatment before the tribunals and all other organs administering justice;

(b) The right to security of person and protection by the State against violence or bodily harm, whether inflicted by government officials or by any individual group or institution;

(c) Political rights, in particular the right to participate in elections-to vote and to stand for election-on the basis of universal and equal suffrage, to take part in the Government as well as in the conduct of public affairs at any level and to have equal access to public service;

(d) Other civil rights, in particular:

(i) The right to freedom of movement and residence within the border of the State;

(ii) The right to leave any country, including one's own, and to return to one's country;

(iii) The right to nationality;

(iv) The right to marriage and choice of spouse;

(v) The right to own property alone as well as in association with others;

(vi) The right to inherit;

(vii) The right to freedom of thought, conscience and religion;

(viii) The right to freedom of opinion and expression;

(ix) The right to freedom of peaceful assembly and association;

(e) Economic, social and cultural rights, in particular:

(i) The rights to work, to free choice of employment, to just and favourable conditions of work, to protection against unemployment, to equal pay for equal work, to just and favourable remuneration;

(ii) The right to form and join trade unions;

(iii) The right to housing;

(iv) The right to public health, medical care, social security and social services;

(v) The right to education and training;

(vi) The right to equal participation in cultural activities;

(f) The right of access to any place or service intended for use by the general public, such as transport hotels, restaurants, cafes, theatres and parks.

Convention on the Rights of Persons with Disabilities

ADOPTED

12 December 2006

BY

Sixty-first session of the General Assembly by resolution A/RES/61/106

Article 21 – Freedom of expression and opinion, and access to information

States Parties shall take all appropriate measures to ensure that persons with disabilities can exercise the right to freedom of expression and opinion, including the freedom to seek, receive and impart information and ideas on an equal basis with others and through all forms of communication of their choice, as defined in article 2 of the present Convention, including by:

- a) Providing information intended for the general public to persons with disabilities in accessible formats and technologies appropriate to different kinds of disabilities in a timely manner and without additional cost;
- b) Accepting and facilitating the use of sign languages, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions;
- c) Urging private entities that provide services to the general public, including through the Internet, to provide information and services in accessible and usable formats for persons with disabilities;
- d) Encouraging the mass media, including providers of information through the Internet, to make their services accessible to persons with disabilities;
- e) Recognizing and promoting the use of sign languages.

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

American Declaration of the Rights and Duties of Man

The American Declaration of the Rights and Duties of Man

Canada is a member of the OAS and is subject to respect the rights and undertake the duties therein the Declaration of the Rights and Duties of Man.

Adoption: The Declaration was adopted by the Ninth International Conference of American States on 2 May 1948 in Bogota, Colombia.

Entry into force: The American Declaration was not meant to be binding on states, therefore it did not enter into force.

Number of signatories and ratifications/accessions: The signatories are considered the 21 states that were present in the creation of the OAS and all member states that have joined since.

Canada joined in 1990 and currently all 35 members of the Americas have ratified the OAS.

Every person has the right freely to profess a religious faith, and to manifest and practice it both in public and in private. Right to religious freedom and worship. Article IV.

<https://humanrightscommitments.ca/wp-content/uploads/2018/10/American-Declaration-of-the-Rights-and-Duties-of-Man.pdf>

American Convention on human rights. (Canada has not ratified but may be subject to international review as a member of the OAS and expected to respect these rights)

Article 12. Freedom of Conscience and Religion

1. Everyone has the right to freedom of conscience and of religion. This right includes freedom to maintain or is freedom to maintain or to change his religion or to change one's religion or beliefs, and freedom to profess or disseminate one's religion or beliefs, either individually or together with others, in public or in private.
2. No one shall be subject to restrictions that might impair his beliefs.

Article 13

1. Everyone has the right to freedom of thought and expression. This right includes freedom to seek, receive, and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing, in print, in the form of art, or through any other medium of one's choice.

2. The exercise of the right provided for in the foregoing paragraph shall not be subject to prior censorship but shall be subject to subsequent imposition of liability, which shall be expressly established by law to the extent necessary to ensure: a. respect for the rights or reputations of others; or b. the protection of national security, public order, or public health or morals.
3. The right of expression may not be restricted by indirect methods or means, such as the abuse of government or private controls over newsprint, radio broadcasting frequencies, or equipment used in the dissemination of information, or by any other means tending to impede the communication and circulation of ideas and opinions.
4. Notwithstanding the provisions of paragraph 2 above, public entertainments may be subject by law to prior censorship for the sole purpose of regulating access to them for the moral protection of childhood and adolescence.
5. Any propaganda for war and any advocacy of national, racial, or religious hatred that constitute incitements to lawless violence or to any other similar action against any person or group of persons on any grounds including those of race, color, religion, language, or national origin shall be considered as offenses punishable by law.

https://www.oas.org/dil/treaties_b-32_american_convention_on_human_rights.pdf

Bracken V Fort Eyrie Town 2017 ONCA 668 (CanLII)

The analytical framework -- s. 2(b) analysis (25)

[25] **Freedom of expression has received broad protection in Canadian law, not only through the *Charter*, but also through legislation and the common law.** As Rand J. noted in *Saumur v. Quebec (City)*, [1953 CanLII 3 \(SCC\)](#), [1953] 2 S.C.R. 299, [1953] S.C.J. No. 49, at p. 329 S.C.R.:

"Strictly speaking, civil rights arise from positive law; **but freedom of speech, religion and the inviolability of the person are original freedoms** which are at once the **necessary attributes and modes of self-expression** of human beings and **the primary conditions of their community life** within a legal order.

" [Section 2\(b\)](#) further **entrenches the limits on government action in order to safeguard the ability of persons to express themselves to**

others. As expressed in *Irwin Toy Ltd. v. Quebec (Attorney General)*, [1989 CanLII 87 \(SCC\)](#), [1989] 1 S.C.R. 927, [1989] S.C.J. No. 36, at pp. 968-69 S.C.R.:

Freedom of expression was entrenched in our Constitution and is guaranteed . . . so as to ensure that everyone can manifest their thoughts, opinions, beliefs, indeed all expressions of the heart and mind, however unpopular, distasteful or contrary to the mainstream. Such protection is, in the words of both the Canadian and Quebec Charters, "fundamental" because in a free, pluralistic and democratic society we prize a diversity of ideas and opinions for their inherent value both to the community and to the individual.

Free expression was for Cardozo J. of the United States Supreme Court "the matrix, the indispensable condition of nearly every other form of freedom" (*Palko v. Connecticut*, 302 U.S. 319 (1937), at p. 327);

for Rand J. of the Supreme Court of Canada, it was "little less vital to man's mind and spirit than breathing is to his physical existence" (*Switzman v. Elbling*, [1957 CanLII 2 \(SCC\)](#), [1957] S.C.R. 285, at p. 306).

And as the European Court stated in the *Handyside* case, Eur. Court H. R., decision of 29 April 1976, Series A No. 24, at p. 23, **freedom of expression:**

. . . is applicable not only to "information" or "ideas" that are favourably received or regarded as inoffensive or as a matter of indifference, but also to those that offend, shock or disturb the State or any sector of the population. Such are the demands of that pluralism, tolerance and broadmindedness without which there is no "democratic society".

[26] In its early s. 2(b) jurisprudence, the Supreme Court drew on the academic literature developed in the context of the First Amendment of the U.S.

Constitution to identify a set of human goods thought to be advanced by a constitutional protection of freedom of expression: *Ford v. Quebec (Attorney*

General), [1988 CanLII 19 \(SCC\)](#), [1988] 2 S.C.R. 712, [1988] S.C.J. No. 88. These goods have been [page170] expressed variously in different decisions over the years.

In *Irwin Toy*, 1988 they were summarized as

- (1) enabling democratic discourse,
- (2) facilitating truth seeking, and
- (3) contributing to personal fulfillment.

In *R.W.D.S.U., Local 558 v. Pepsi-Cola Canada Beverages (West) Ltd.*, [2002] 1 S.C.R. 156, [2002] S.C.J. No. 7, [2002 SCC 8](#), at para. [32](#), they were rendered as

"self-fulfilment, participation in social and political decision-making, and the communal exchange of ideas". Freedom of expression is thus not only inherently valuable to the self-constituting person, but courts have long recognized that it is also instrumental to the functioning of a healthy political community, particularly by facilitating the open criticism of government: *Ramsden v. Peterborough (City)* (1993), [1993 CanLII 60 \(SCC\)](#), 15 O.R. (3d) 548, [1993] 2 S.C.R. 1084, [1993] S.C.J. No. 87.

6 Québec Inc., [2005] 3 S.C.R. 141, [2005] S.C.J. No. 63, [2005 SCC 62](#).

[34] Having concluded that the claimant has engaged in expression and the protection of s. 2(b) is not negated because of an inherent limit such as method or location, the next step in the s. 2(b) analysis set out in *Irwin Toy* is to ask whether the government action in question restricts expression in purpose or effect: *Montréal (City)*, at para. [82](#).

If the government action in question does not purposefully limit the expression in question, but limits it only as a side effect of pursuing some other purpose, the claimant is put to the additional burden of establishing that the expression in issue promotes one of the three purposes of freedom of expression articulated in *Irwin Toy*, at p. 976 S.C.R.: enabling democratic discourse, facilitating truth seeking and contributing to personal fulfillment: *Montréal (City)*, at para. [83](#).

[https://albertacourts.ca/docs/default-source/qb/judgments/lethbridge-and-district-pro-life-association-v-lethbridge-\(city\)-2020-abqb-654---reasons-for-decision.pdf?sfvrsn=490a6983_2](https://albertacourts.ca/docs/default-source/qb/judgments/lethbridge-and-district-pro-life-association-v-lethbridge-(city)-2020-abqb-654---reasons-for-decision.pdf?sfvrsn=490a6983_2)

Court of Queen's Bench of Alberta; Lethbridge and District Pro-Life Association v Lethbridge City 2020 ABQB 654

2b Freedom of Expression; was given broad, purposive interpretation

- Irwin Toy, supra
- Even prior to Charter – recognized the fundamental importance of “freedom of expression”
- Alberta Statutes, 1938 CanLII (SCC) at page 752-753

Page 18

<https://www.canlii.org/en/on/onca/doc/2017/2017onca668/2017onca668.html>

Bracken V Fort Eyrie Town 2017 ONCA 668 (CanLII)

TRESPASS NOTICE “The trespass notice had the effect of limiting the applicant's s. 2(b) rights.”

Held, the appeal should be allowed.

FEELINGS MAKE NO DIFFERENCE **“An observer's subjective feelings of disquiet, unease, or even fear are not in themselves capable of ousting expression categorically from the protection of s. 2(b).”**

*“The application judge erred in finding that the applicant's protest was violent and that his actions therefore did not come within the protection of s. 2(b). The applicant did not physically obstruct anyone or prevent anyone from entering the building. There was no reasonable basis for the employees' fear. Violence is not the mere absence of civility. **An observer's subjective feelings of disquiet, unease, or even fear are not in themselves capable of ousting expression categorically from the protection of s. 2(b).** Moreover, the protest did not take place in a location where s. 2(b) protection does not exist. The literal public square is paradigmatically the place for expression of public dissent. **The trespass notice had the effect of limiting the applicant's s. 2(b) rights.**”*

The limitation of the applicant's freedom of expression was not justified under s. 1 of the Charter. The respondent could not establish that it was acting for a sufficiently important purpose. Even if it were to succeed on that basis, it would nevertheless fail as its actions did not minimally impair the applicant's freedom of expression and there was no proportionality between the deleterious and salutary effects of the expulsion and trespass notice. [page162] “

Mrs Jakki Jeffs
Executive Director
Alliance for Life Ontario
26, Norfolk Street,
Guelph, Ontario N1H 4H8
aflo@mgl.ca
519 824-7797/1 866 LUV BOTH (588 2684)
www.allianceforlife.org
www.petitionofonemillion.ca
www.personhood.ca
www.wewantthedebate.ca

GARTL bus ad 5: Copy of Advertising Decision

Vanessa Montague <info@guelphforlife.com>

Wed, Aug 2, 2023,
10:39 AM

to communications, Jakki

Hello,

I'm looking to access the City of Guelph's transit bus advertising policy, including requirements for acceptable advertising; would you be able to tell me where I can find this information?

Additionally, GARTL has learned one of our new bus ads has not been approved to run on City buses: *Thanks for the opportunity to review these ads. "GARTL bus ad 5.pdf" which suggests that pharmaceutical products approved by Health Canada are not safe, does not meet the requirement for acceptable advertising. Defamatory statements are illegal to publish, and as such we cannot permit them to run on City of Guelph buses or other City property. If the advertiser has more questions about our decision and its reasoning, please invite them to contact us at communications@guelph.ca.*

Can you provide the specific reference used to make the decision about this ad not meeting the requirement for acceptable advertising?

Thank you.

Vanessa Montague
Program Manager
Guelph & Area Right to Life
(519) 836-6311
www.guelphforlife.com

Vanessa Montague <info@guelphforlife.com>

Wed, Aug 9, 2023,
2:27 PM

to communications, Jakki

Hello,

Just following up on these questions sent last week-- would someone from the City's communications office be able to assist with this? If not, can you recommend an alternative contact?

Thank you,

Vanessa Montague
Program Manager
Guelph & Area Right to Life
(519) 836-6311
www.guelphforlife.com

Laura Mousseau <Laura.Mousseau@guelph.ca>

Wed, Aug 9, 2023,
3:10 PM

to me, aflo@mgl.ca

Hello Vanessa Montague,

In response to your request for more information about the City's decision to refuse "GARTL bus ad 5.pdf" from being shown on City property, the City's [Advertising Acceptability Policy](#) specifies that all advertising must comply with applicable law and with the requirements of the Code of Advertising Standards except where the latter conflicts with applicable law. The City's obligations under Ontario law include not publishing defamatory content.

Pharmaceuticals authorized to be prescribed in Canada are subject to rigorous and ongoing specialized scientific review by highly qualified scientists working for Health Canada. Given that your proposed advertisement states or implies that pharmaceuticals which are currently legally prescribed in Canada for medical abortion are unsafe, it impugns both the manufacturer and the approval authority (and possible also prescribing physicians and pharmacists). Without very compelling evidence, the City cannot permit a statement that "Legal ≠ Safe" to appear on a City bus; that statement is not supportable and the publication of injurious falsehoods is prohibited by law.

We're mindful of the right to freedom of expression and have expressly considered it in this case. However the Supreme Court of Canada has confirmed that the law of defamation remains applicable as a reasonable and justifiable common law limit on expression. As such the City ~~is~~ remains compelled to refuse this advertisement in the form and with the words proposed.

I'd also like to note that the City's current Advertising Acceptability Policy is being updated and will be presented to Council on September 6, 2023. Staff's recommended updates to the Policy are aligned with the Divisional Court decision of January 2023 in *Guelph and Area Right to Life v. Guelph (City)* with which I expect you're familiar.

You're welcome to share any additional information and evidence in support of the ad in question, or to provide a different ad for consideration.

Laura Mousseau ([how to say my name](#)), APR (she/her/they/them)

Manager, Strategic Communications

Strategic Communications and Community Engagement

City of Guelph

226-821-4185

TTY 519-826-9771

laura.mousseau@guelph.ca

From: Vanessa Montague <info@guelphforlife.com>
Sent: Wednesday, August 2, 2023 10:39:15 AM (UTC-05:00) Eastern Time (US & Canada)
To: Communications <communications@guelph.ca>
Cc: Jakki Jeffs <aflo@mgl.ca>
Subject: City of Guelph advertising policy

Vanessa Montague <info@guelphforlife.com>

Fri, Aug 11, 2023,
10:39 AM

to Laura, aflo@mgl.ca

Hi Laura,

I appreciate your response and would like to request some additional information in order to better understand the City's decision to deny bus ad #5.

Can you please provide:

The reference within the City's Advertising Acceptability Policy that you are referring to when you mention 'the City's Advertising Acceptability Policy specifies that all advertising must comply with applicable law and with the requirements of the Code of Advertising Standards except where the latter conflicts with applicable law. The City's obligations under Ontario law include not publishing defamatory content'.

The specific Ontario law you are referring to when you state 'The City's obligations under Ontario law include not publishing defamatory content'.

The reference you used to conclude our statement is not supportable and the reference used to determine it is an "injurious falsehood".

The reference you used to inform us that the "Supreme Court of Canada has confirmed that the law of defamation remains applicable as a reasonable and justifiable common law limit on expression. As such the City is remains compelled to refuse this advertisement in the form and with the words proposed".

Additionally, you mentioned the ad states or implies pharmaceuticals which are currently legally prescribed in Canada for medical abortion are unsafe. Could you clarify if you think the ad is specifically stating this or specifically implying this?

Thank you,
Vanessa

Vanessa Montague
Program Manager
Guelph & Area Right to Life
(519) 836-6311
www.guelphforlife.com

Laura Mousseau <Laura.Mousseau@guelph.ca>

Wed, Aug 16, 2023,
5:15 PM

to me, aflo@mgl.ca

Hello Vanessa,

Defamation is defined by the common law of Ontario and the Libel and Slander Act (Ontario), R.S.O. 1990, c. L.12.

Injurious falsehood is defined in the common law and would extend to asserting that a product was “not safe” where this was not supportable factually. Where ensuring safety is the statutory responsibility of a government agency, that statement also impugns the agency.

The Supreme Court of Canada examined the common law of defamation and the Charter in *Hill v. Scientology* 1995 CanLII 59 (SCC), [1995] 2 SCR 1130 and this remains good law. We recommend you obtain your own legal advice as to how this decision influences your rights and obligations. We continue to believe that it supports our position not to run the ad.

We believe that the plain meaning of “Legal ≠ Safe” with the graphics in the ad clearly states and necessarily implies that one or more pharmaceuticals legal in Canada for medical abortion are “not safe”. Without substantial support for the truth of this assertion, we cannot run your proposed ad.

Laura Mousseau ([how to say my name](#)), APR (she/her/they/them)

Manager, Strategic Communications

Strategic Communications and Community Engagement

City of Guelph

226-821-4185

TTY 519-826-9771

laura.mousseau@guelph.ca

Laura Mousseau <Laura.Mousseau@guelph.ca>

Tue, Sep 12, 2023,
10:18 AM

to me, aflo@mgl.ca

Hi Vanessa,

I'm following up on a phone call from Jakki Jeffs on your behalf late last week regarding the update of the City's Ad Acceptability Policy. It was determined that, given the policy is administrative in nature, and that the procedures in it are delegated to and managed by staff, it should not be presented to Council at Committee of the Whole as it does not require a decision from Council.

The City is finalizing the update of this policy and, once complete, it will be shared with Council and the community. Apologies for the miscommunication.

Laura Mousseau ([how to say my name](#)), APR (she/her/they/them)

Manager, Strategic Communications

Strategic Communications and Community Engagement

City of Guelph

226-821-4185

TTY 519-826-9771

laura.mousseau@guelph.ca

GARTL bus ad 3: Copy of Advertising Decision

(August 16, 2023)

Laura Mousseau <Laura.Mousseau@guelph.ca>

to me, aflo@mgl.ca

Hello again Vanessa,

The ad in question directs people to a website that provides information that could be construed as medical advice, and the subject matter of which both the Society of Obstetricians and Gynecologists of Canada and the American College of Obstetricians and Gynecologists have issued statements asserting that abortion pill “reversal” is not supported by science.

Similar to our rationale for not approving the other ad making claims about a legal and Health Canada approved treatment, there are also legal risks to the City in allowing this information to be promoted on City property.

Laura Mousseau ([how to say my name](#)), APR (she/her/they/them)

Manager, Strategic Communications

Strategic Communications and Community Engagement

City of Guelph

226-821-4185

TTY 519-826-9771

laura.mousseau@guelph.ca

From: Vanessa Montague <info@guelphforlife.com>

Sent: Thursday, August 10, 2023 12:32 PM

To: Communications <communications@guelph.ca>

Cc: Jakki Jeffs <aflo@mgl.ca>

Subject: GARTL bus ad 3

Hello,

Thank you for the opportunity to receive information about the City's decision pertaining to GARTL bus ad 3. I understand this ad was denied due to legal concerns. I would like to request more information about how this decision was made, including the specific legal concerns and the reference used within the City's Advertising Acceptability Policy.

Thanks,

Vanessa

Vanessa Montague

Program Manager

Guelph & Area Right to Life

(519) 836-6311

www.guelphforlife.com

----- Forwarded message -----

From: **Chris Ottmann** <chris@streetseenmedia.com>

Date: Wed, Aug 9, 2023 at 3:51 PM

Subject: Fwd: GARTL - Transit Ads creative change

To: Vanessa Montague <info@guelphforlife.com>

Hi Vanessa,

Please see response from Guelph.

Please let me know if you have any questions
or what Ads I can proceed with while we work through the requests from the City.

Thanks again and talk soon.

Chris

Sent from my Bell Samsung device over Canada's largest network.

From: Laura Mousseau <Laura.Mousseau@guelph.ca>

Sent: Wednesday, August 9, 2023 3:21:29 p.m.

To: Chris Ottmann <chris@streetseenmedia.com>

Cc: Courtney McDonald <courtney.mcdonald@guelph.ca>; Lisa Duarte <Lisa.Duarte@guelph.ca>

Subject: FW: GARTL - Transit Ads creative change

Hi Chris,

I'm sorry we missed your requested turnaround on approval of GARTL ads 1, 2 and 3. Many folks were out of the office last week.

The City approves GARTL ads 1 and 2 but "GARTL bus ad 3.pdf" cannot be approved as is as it presents some legal concerns for the City.

The advertiser is welcome to email communications@guelph.ca to discuss or get more information about this decision.

Laura Mousseau ([how to say my name](#)), APR (she/her/they/them)

Manager, Strategic Communications

Strategic Communications and Community Engagement

City of Guelph

226-821-4185

TTY 519-826-9771

laura.mousseau@guelph.ca

Copy of advertising

GARTL bus ad 3



**Regret taking the
1st abortion pill?
You can have a
second chance.**

abortionpillreversal.ca | 1.888.612.3960

**Guelph & Area Right to Life
guelphforlife.com
519.836.6311**

The opinions expressed in this advertisement or by the sponsor of this advertisement, do not in any way represent the opinions of, and are not endorsed by, the City of Guelph

GARTL bus ad 5



**THE ABORTION PILL. SAFE?
WITH A 4X HIGHER INCIDENCE OF
ADVERSE EVENTS COMPARED TO
SURGICAL ABORTION?
LEGAL ≠ SAFE**

GUELPH & AREA RIGHT TO LIFE | 519.836.6311 | GUELPHFORLIFE.COM

The opinions expressed in this advertisement or by the sponsor of this advertisement do not in any way represent the opinions of, and are not endorsed by, the City of Guelph

Advertiser information

Name: Guelph & Area Right to Life Association

Phone number: 519-836-6311

Address: 26 Norfolk St, Guelph, ON, N1H 4H8