



Justice Centre

for Constitutional Freedoms

April 24, 2020

Sent via email and mail

Hon. Tyler Shandro
Minister of Health
423 Legislature Building
10800 – 97 Avenue
Edmonton, AB T5K 2B6

Dear Minister Shandro,

I write in regard to the Alberta Government's COVID-19 predictions, first released on April 8, 2020, and the theories and assumptions underlying these predictions.

We assume that your predictions form the basis of the Alberta Government's response to COVID-19. If our assumption is incorrect, please let us know.

On April 8, you predicted roughly 340 “probable” COVID-19 hospitalizations for April 21,¹ yet the actual data produced by your government now indicates that on April 21, only 68 persons were in hospital due to contracting COVID-19.² No one expects disease predictions to be one hundred percent accurate, but when the low end of a model overestimates the problem by around 500%, questions are raised as to the wisdom of current government policies to shut down the economy and throw vulnerable Albertans into unemployment, bankruptcy or poverty. We note that your above-mentioned prediction of April 8, regarding 340 hospitalizations, took into account Alberta's current lockdown approach, which was already in effect.

The Alberta government's data indicates that 63 of 66 of COVID-19 deaths (95%) occurred amongst people over 60, and 45 of the 66 deaths (68%) occurred amongst those over 80.³ It appears that the goal of saving the lives of vulnerable Albertans, which serves as the justification for the government's lockdown of society and the economy, is not being achieved.

Recent papers from Oxford University,⁴ Stanford University,⁵ and the University of Southern California⁶ suggest that the COVID-19 death rates have been vastly overestimated.⁷ This, too, calls into question the extraordinary and unprecedented lockdown measures taken by the Alberta government, and other governments around the world. Florida Governor Ron DeSantis recently observed that projections of fatalities have proven to be “false.”⁸ Sweden has taken a very different approach to COVID-19 mitigation,⁹ one which does not shut down the economy, and

instead is focussed on increasing ICU capacity, and enabling the public to develop herd immunity, which doctors recognize as the best way to vanquish a virus.¹⁰

The following questions refer to the COVID-19 predictions which the Alberta Government released on April 8, 2020; we enclose a copy of your document for reference.¹¹

I respectfully request your answers to the following:

1. What are the underlying assumptions on which your government's COVID-19 predictions are based? What studies, reports or other documentation is used to formulate your predictions?
2. What statistical data and other evidence were your government's COVID-19 predictions based upon? How was this data and evidence used and applied?
3. Were the COVID-19 predictions built using data collected during past pandemics? If so, what data was used, and in what way?
4. What statistical theories or predictive approaches were used to construct the COVID-19 predictions that your government is using?
5. Who were the principal architects of the COVID-19 predictions, and what are their specific qualifications?
6. Did the Alberta Government rely, in part or in whole, on the work of other national or international organizations? If so, which organizations, and what work from those organizations specifically was relied upon?
7. Recent seroprevalence data has consistently demonstrated an infection fatality rate much lower than that assumed by early models, such as the Imperial College model of Prof. Neil Ferguson, thus completely invalidating those early models. Will Alberta's models be revised in light of these new findings?

We believe that Albertans have a right to access the entirety of literature, documentation, evidence and methods which undergird Alberta's current COVID-19 predictions, especially given the damage done to their society, economy and well-being because of government measures that are crippling our economy. We therefore ask that the government take a generous rather than restrictive interpretation to these questions, for the sake of goodwill and public confidence.

A paper documenting a proper scientific study consists of more than just the abstract, conclusion or predictions. By themselves, predictions and conclusions merely amount to forceful declarations of alleged fact. A scientific paper worthy of the adjective "scientific" will include

the methods and data upon which its conclusions and predictions rest, such that the conclusions and predictions can be properly scrutinized and understood.

As you know, the *Canadian Charter of Rights and Freedoms* places the onus on government (not the citizen) to justify the government's violation of *Charter* freedoms to move, travel, assemble, associate and practice one's faith. Part of this justificatory exercise includes providing the public with the entire methodology and supporting evidence used to reach its COVID-19 predictions about deaths, infections, the availability of ICU spaces, and other related issues. The stakes are too high for anything less.

The Justice Centre awaits the prompt and public release of the documentation requested, as well as clear answers to the questions asked.

Yours truly,



John Carpay, B.A., LL.B.

President

Justice Centre for Constitutional Freedoms

cc. Premier Jason Kenney
Dr. Deena Hinshaw, Chief Medical Officer of Health

Enclosures

¹ It is difficult to determine the exact numbers from the graphs provided by the Alberta Government.

<https://www.alberta.ca/assets/documents/covid-19-case-modelling-projection.pdf>.

² <https://covid19stats.alberta.ca/>.

³ Ibid.

⁴ <https://www.medrxiv.org/content/10.1101/2020.03.24.20042291v1.full.pdf>.

⁵ <https://www.medrxiv.org/content/10.1101/2020.04.14.20062463v1>.

⁶ <http://createsend.com/t/j-296D9D8CE54262BB2540EF23F30FEDED>.

⁷ This theory is supported, in part, by testing which indicates that many more people have already contracted COVID-19 than were tested.

⁸ <https://www.firstcoastnews.com/article/news/health/coronavirus/watch-live-florida-gov-ron-desantis-gives-update-on-covid-19/77-619cc50c-8974-463c-8bad-875ff278cabf>.

⁹ <https://www.bloomberg.com/news/articles/2020-04-19/sweden-says-controversial-covid-19-strategy-is-proving-effective>.

¹⁰ <https://www.thelocal.se/20200330/pressure-increases-on-stockholm-hospitals-as-coronavirus-storm-increases-in-strength>.

¹¹ <https://www.alberta.ca/assets/documents/covid-19-case-modelling-projection.pdf>.