



Justice Centre for Constitutional Freedoms

October 21, 2020

Via email to wjeffrey@london.ca

Wade Jeffery
Municipal Law Enforcement Officer
Development & Compliance Services
City of London
300 Dufferin Avenue
London, ON N6A 4L9

Dear Mr. Jeffery,

Re: City of London's illegal censorship of Spirituality in You Healing Centre

We have been retained by Heather Rulton who owns and operates the Spirituality in You Healing Centre located in London.

We understand that officers acting on your advice have issued Ms. Rulton a ticket for allegedly failing "to comply with a continued section 7.0.2 Order" in "operating contrary to the Reopening Ontario Act".

Even after conversations with officers, Ms. Rulton has been unable to determine which, if any, specific provision Ms. Rulton is allegedly violating. Despite this lack of clarity or explanation, officers are threatening to issue Ms. Rulton further tickets.

The evident source of the officers' concern is a sign indicating plainly that Ms. Rulton and staff do not ask questions to individuals who are unable to wear masks. This sign is necessary to communicate that Spirituality in You Healing Centre respects the human rights of its clientele, many of whom are homeless and some of whom suffer disabilities that render them unable to wear a mask.

The Spirituality in You Healing Centre has posted the City of London sign that "Face Covering or Mask is Required" and is complying with all other applicable requirements.

I trust that it is not necessary to explain the City of London's obligation to respect Canadians' freedom of expression guaranteed as a fundamental in the *Canadian Charter of Rights and Freedoms*. It is a serious violation of this freedom for officers, ostensibly acting at your direction, to fine and harass Ms. Rulton and her staff on account of their sign.

We demand that you immediately cease this unlawful attempted censorship of Ms. Rulton.

I request your immediate confirmation, no later than October 23, 2020, that the City of London will not continue to attempt to fine or otherwise harass Ms. Rulton or Spirituality in You Healing Centre staff for posting a sign communicating respect for the human rights of their clientele.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Marty Moore', with a long horizontal flourish extending to the right.

Marty Moore, J.D.

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