

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

**BETWEEN:**

**ADAMSON BARBECUE LIMITED**  
**AND WILLIAM ADAMSON SKELLY**

**Applicants**

**AND**

**HER MAJESTY THE QUEEN IN RIGHT OF ONTARIO**

**Respondent**

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**AFFIDAVIT OF WILLIAM ADAMSON SKELLY**

(SWORN ON FEBRUARY 18, 2021)

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I, WILLIAM ADAMSON SKELLY, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY:**

**BACKGROUND**

1. I am a father of two (2) young children and a husband to my wife.
2. I am the sole owner and director of Adamson Barbecue Limited with the following restaurant locations: 176 Wicksteed Avenue, Toronto, Ontario M4G 2B6 (“Etobicoke restaurant”), 7 Queen Elizabeth Boulevard, Toronto, Ontario M8Z 1L8 (“Leaside restaurant”), and 15195 Yonge Street, Aurora, Ontario L4G 1L8 (“Aurora restaurant”).

3. As such, I have knowledge of the events and matters before the Court which gave rise to the s.9 Order under the *Reopening Ontario Act* (ROA) sought against me and my business.
4. I have always been a hard working and determined entrepreneur who is devoted to operating my businesses. The experiences and challenges I have had have taught me to be resourceful, to develop practical skills, to fully learn, and internalize the details and scope of projects. These skills allow me to take a macro perspective of situations to understand all working parts in them. Most of all, it has left me with an open mind to new ideas and concepts. This is relevant to my search for truth around COVID-19 and the resulting “safety” measures.

#### **ADAMSON BARBECUE**

5. At twenty-six (26) years old, I took \$2,500 in savings and invested into a concession trailer to start my barbecue catering company. It was an overnight success. Within three (3) years, I had earned enough to open a restaurant. Within one (1) year, I reached \$1 million in annual revenue and was employing over ten (10) people to provide quality customer service to our patrons.
6. By 2020, my third year in the restaurant business, I was onto my second location and employed over fifty (50) people with a payroll over \$1 million per year. This location was profitable in the first month, so I took advantage of the CSBFL loans and went on to open my third restaurant. It was the largest, at 7000sqf. It would have been my flagship restaurant, with an impressive pit room and cooking operation, with seating for eighty (80) customers and parking for fifty (50) cars.
7. To get to this point, I had to understand human resources, customer service, digital marketing, accounting, importing, warehousing, inventory management, and of course, high quality cooking.

8. Understanding how to operate an efficient and successful business in Canada broadened my perspective on economics and politics. This helped me understand my role in the economy and in the Canadian society.
9. I believe that the ability to succeed and prosper as an entrepreneur is a fundamental key to a democratic and free society which is the pillar of the Canadian system. As such, I recognized not only how my business was being affected, but how the fundamental pillars of democracy were eroding away due to COVID-19 and its subsequent “safety measures”.

## **COVID-19 IMPACTS**

### **MARCH 2020**

10. Early March 2020, I put down a \$40,000 deposit to lease the building for my third location in Etobicoke. Within a few days, the province went into lockdown. My sales, which allowed for the CSBFL loans, immediately dropped. I went from a cash flow positive position to a financial bleed almost immediately.
11. Being an open minded, free thinking entrepreneur, I immediately began questioning everything we were told from the mainstream news and public officials regarding the alleged “deadly and contagious COVID-19 virus”, COVID-19 lockdowns/safety measures (i.e., COVID-19 masks, social distancing, and self-isolation), and more. The COVID-19 measures were unprecedented, and the fear mongering from the media did not line up with the reality I and many others were experiencing. These COVID-19 measures have been causing significant collateral damages to myself and other Canadians such as financial harm and psychological harm.
12. 2020 has been a year that propelled me into conducting my own research and investigation into the truth about COVID-19. I was following the news out of Europe closely, as they were a few

months ahead of us as the “pandemic” progressed. I noticed how it was largely the elderly who were affected, yet nothing was being done to protect them. I noticed the politicization of medical treatments as the media was making a huge deal out of ventilators, despite 90% of the patients who were put on them ended up dying. All the while, common treatments like hydroxychloroquine (“HCQ”) were vilified by the media as well as the failure to actually discuss anything about natural remedies, proper nutrition, and exercise.

13. As the “pandemic” progressed in Canada, the same trends followed. This alleged virus was reported to negatively affect the elderly in Long-term Care (“LTC”) centers, yet no rapid antigen testing was put in place at these facilities (and has not to this day). From my observance of LTC centres, I believe there are a lot of questionable and suspicious things going on behind the scenes in these LTC centres.
14. I saw how record numbers of people were taking \$2,000 a month from the government, while a small fraction of this money would have easily protected those in the LTC centers. I also saw that with this money being given to citizens there would be detrimental effects on businesses and entrepreneurs like myself, meaning that we were financially at the mercy of government hand-outs.
15. I called my MPP, I wrote to politicians, and never heard back from them. This ignoring and unanswered questions and concerns raised further doubt about the entire situation. It became increasingly clear over the next few months how this was no longer about health, but about politics. Only one side of the narrative was accepted to discuss, and any dissenting opinions were labeled as selfish, ignorant, or “denying science”.

SEPTEMBER 2020

16. By September, I had to lay off a third of my workforce because of the financial harm caused by the lockdown/restrictions. These employees were not afraid and wanted to work to financially support their families, but I could not afford to keep them around. Not one of them, or our customers, had been affected by COVID-19. No one became sick. No one was hospitalized, let alone died. I was growing increasingly frustrated by the lack of government action around the LTCs and protecting the vulnerable; while they were clamping down on small businesses like mine, and healthy people like my employees and my customers.
17. I believe in Albert Einstein's quote, "condemnation without investigation is the height of ignorance", which encouraged me to research and investigate into COVID-19 myself. I learned about the polymerase chain reaction (PCR) test, and how its Nobel Prize-winning inventor, Dr. Kary Mullis, claimed it should not be used to diagnose viral infections, especially as a standalone test. At a high enough cycle threshold, it could "detect almost anything". Unfortunately, Dr. Kary Mullis passed away on August 7, 2019 strangely a few months prior to when the "pandemic" started in 2020 and cannot speak to the improper application of his PCR test to COVID-19.
18. I further learned how unreliable the PCR test is in isolating, identifying, and diagnosing COVID-19 when I discovered the President of Tanzania, John Magufuli, exposed that even a goat and a pawpaw fruit can falsely test positive for COVID-19. Others around the world have found similar testing issues using different non-human specimens, which receive very little to no mainstream media attention.
19. I reached out to LifeLabs and DynaCare, the labs handling most of the COVID-19 tests in Ontario. I discovered that they both used a cycle threshold (Ct) value of over 40. When I pushed

the question, and asked for comparison Ct values on other tests, I was met with hostility by the lab technicians. They eventually stopped answering my questions.

20. The lack of response and transparency made me grow even more suspicious, considering how this new metric “case counts”, which are created by this inaccurate PCR test, was the primary metric used to justify pulling us in and out of lockdowns, despite having no impact on real world metrics like overall mortality, hospital, and ICU admissions. I was also questioning as to how they determine when to put COVID-19 on death certificates as though it is the cause of death.
21. I have seen others submit Freedom of Information Requests (“FOIR”) to the public officials for evidence that the COVID-19 virus has been isolated and identified, as required by Thomas M. River’s Postulates; however, they did not receive such evidence as requested.
22. As more news was being released about the “second wave” (which at this point was obviously the approaching flu season), I was seriously questioning whether to continue complying with future mandates.
23. At a press conference, Premier Doug Ford said he would not shutdown bars, restaurants, and gyms again without solid evidence. I made a post on my personal Instagram page hypothesising we would in fact be locked down within 7-10 days. I was wrong, as it was only three days later he announced the lockdown. This announcement came with no supporting data despite his promise. Shortly after that, it was revealed that Toronto Public Health officials were made to sign NDA’s when attending meetings with the provincial health board. I was livid at this news. I could see a lack of democracy, transparency, and accountability in our government officials.
24. A few days later, some data was released by Ontario Public Health describing yet another metric (not at all tied to real world impacts) “Outbreaks”. These were supposedly happening

in restaurants and bars in Toronto. I contacted dozens of colleagues in my industry, and none of them had their contact tracing data collected by the government. I was left with more questions as to how they determined that these outbreaks happened in restaurants if none of our personal data was collected. This made no sense to me and further amplified my confusion and desire for clarity as well as the truth.

25. The authorities eventually abandoned contact-tracing but continued to enforce small businesses to keep records of our personal contact details and invade our privacy. Small businesses were used to collect this data, enforce masks and social distancing, and keep up the facade of this whole scam instead of the municipal by-law officers. This is not our job as business owners, and while most complied, it is a complete overreach by the authorities to place this burden on us, especially with its ambiguity. We, as small business owners, became police and enforcement against our own customers.

26. The new “colour coded” lockdown system was used as a social conditioning mechanism teaching us to accept these measures and new rules thrust upon us as business owners and citizens. They were constantly moving the goalpost and changing how businesses have operated. These expectations created many issues for my small business because I could not keep up with the constant fluidity and uncertainty caused by the imposition of COVID-19 restrictions and measures.

27. In 2020, I have been attending the Canadian freedom movement’s peaceful protests in Ontario and have been connecting with other like-minded individuals who do not agree with the government’s COVID-19 measures.

NOVEMBER 2020

28. By November, there were a plethora of studies on alternative treatments (Hydroxychloroquine, Ivermectin, holistic medicine, etc.), the ineffectiveness of masks and social distancing, and the statistically insignificant effect of the alleged asymptomatic transmission from healthy people. There was enough data to prove that restaurants, bars, and gyms were not driving the spread of COVID-19.
29. The province began around that time to release its daily and weekly epidemiological reports, which clearly demonstrates this. My calls and letters to politicians were proving fruitless, leaving me no recourse and no remedy. It was clear there was a larger Marxist agenda to crush small and medium-sized businesses, while favouring the largest and most profitable corporate businesses at our expense. The politicians had still not protected the vulnerable from this allegedly “deadly and contagious virus”, and instead created further pockets of vulnerability within a relatively healthy society.
30. It was clear to me that civil disobedience was my last and only option to have my voice heard and preserve my rights and freedoms under the *Charter*. I decided that I would do so at my next opportunity.

## **CIVIL DISOBEDIENCE**

NOVEMBER 24, 2020

31. On Monday November 23, 2020 I announced on my Instagram account via video that I would be opening my Etobicoke restaurant to peacefully protest in defiance of the *Reopening Ontario Act (ROA)* given that on November 24th Toronto would be entering a “red zone”. It was met



with an explosion of support from like-minded Canadians. My Instagram video amassed over half a million views, and 20k comments.

32. The first day of what was labelled the “Barbecue Rebellion”, Tuesday November 24, 2020, hundreds of people showed up in support. It was obvious that I had the support of a huge number of people, who were also unsatisfied and in distress with the government's COVID-19 lockdown/restrictions; they were ready to engage in peaceful civil disobedience themselves to regain their rights and freedoms.
33. At the end of the day, the Medical Officer of Health, Dr. Eileen DeVilla, issued an *HPPA* section 22 Class Order to close my business. This was under the pretense of “reasonable and probable grounds to believe a communicable disease exists on the property”. Considering nobody has ever showed any signs of illnesses or symptoms, I did not believe such reasonable and probable grounds existed then, or at any time. As such, I decided to continue engaging in peaceful civil disobedience.

NOVEMBER 25, 2020

34. On Wednesday November 25th, I opened my Etobicoke restaurant for dine-in for the second day of the “Barbecue Rebellion”. I followed all COVID-19 procedures at my restaurant against my desires, except for the actual ban on dine-in service. Proper COVID-19 signage was posted. All customers were told to wear PPE and social distance. We allowed and respected COVID-19 mask exemptions.
35. Many of the customers engaged in peaceful civil disobedience themselves, as they were left with no choice either because of our governments’ overreach. There were many bylaw officers and police on site who did not attempt to enforce these mandates. Instead of regulating any

customers, the Ministry of Health (“MOH”) directed MLS, TPH, and TPS to “take actions necessary to ensure that the premises remain closed...including replacing the locks, installation of cinder blocks or other blockades and posting notices about the Order.”

36. It was by the second day, when the crowds had grown larger. I met, shook the hands of, and hugged hundreds of patriotic, liberty-loving Canadians who I am proud to call my friends. Most of these people do not follow the COVID-19 measures, they see their friends and families, and do not wear masks. Despite my close contact with these great people, none of our friends or families fell ill from the alleged COVID-19. This went against everything I had been told about the alleged contagiousness and deadliness of COVID-19. By the end of the day, I was issued a summons for violating the *ROA*. I decided to open again and continue to accept my summons until I had my day in court.

NOVEMBER 26, 2020

37. On the third day, November 26, 2020, the Ministry of Health (“MOH”) unlawfully seized (“possessed”) my property and premises and used Toronto Police Services to invoke the *TPTA* on my own property. This action, effected in bad faith by an unelected health official, allowed the police to arrest me for accessing my own property. In the end, I was arrested and made to take a 200m perp walk in front of the media to a cruiser.

38. Rather than using the cinder blocks, as recommended by the MOH, approximately 253 members of the TPS were deployed to my restaurant, including 140 uniformed officers, 18 mounted officers, and 41 public order officers. They surrounded my restaurant, blocking and denying my customers from entering. I believed this to be an incredibly excessive and unwarranted use of police resources. My restaurant was seized by the government.

39. Later after the incidents and my arrest, I was delivered a payment request from the Board of Health for “expenses incurred by the Board in carrying out directions given by Dr. Eileen De Villa” of \$187,030.56 to which I was shocked to receive. I cannot pay this fee given the financial catastrophe on my businesses caused by these COVID-19 lockdown/restrictions.
40. I was arrested and held for over thirty (30) hours on trespass, mischief and obstruct charges. This should never have been escalated to a criminal law matter. I was given a choice between a consent hearing on Friday night, or to wait in jail until the following Thursday for a proper bail hearing. I was advised by my counsel to bail out. In hindsight, this was a poor choice because the bail conditions put a stop to my civil disobedience.
41. Since my bail conditions, I was silenced and unable to make any difference. My ability to take part in a free and democratic society whereby *Charter* rights/freedoms, such as the right to peaceful protest and right to free speech, were taken away from me. However, this inability to act through my business operations allowed me another avenue to fight these issues and the COVID-19 lockdown/restrictions through a legal capacity.
42. I have suffered financial, emotional, and psychological distress from these measures and subsequent actions taken by the government against me and my business. From all my activism in the Canadian Freedom Movement, I truly know that I am not the only Canadian negatively impacted and harmed by the government’s COVID-19 lockdown/restrictions. We are watching every one of our basic human rights and freedoms slowly being taken away from us.
43. I have been slandered, ridiculed, and silenced. The mainstream journalists and politicians have not only taken the hammer to me, but also construed a false narrative about me to publicly shame and ostracize me. Their unwarranted public ridicule of me has sent many other Canadians, who believe and trust the government officials and mainstream media, to send

hatred and insults towards myself and everyone connected to me. Nonetheless, I am resilient and willing to continue challenging the government given the dire need to demand democracy and transparency from all levels of government pertaining to COVID-19 and maintain accountability for the injustices caused.

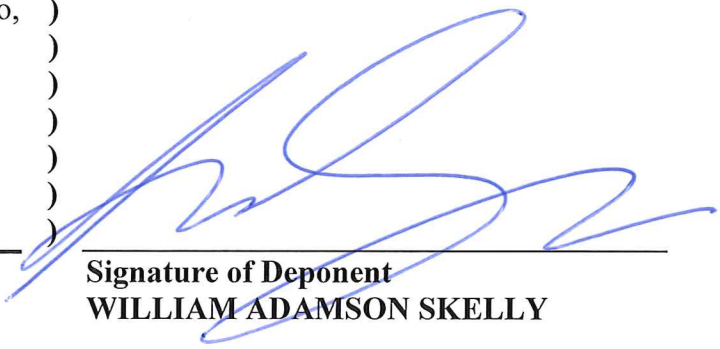
44. I will always feel tremendous gratitude and appreciation for my employees, customers, family members, and fellow Canadian freedom activists who have been supporting me and my businesses throughout these challenging times.

45. Due to time constraints, I intend to supply a supplementary Affidavit along with my factum to be presented for the constitutional challenge.

46. I make this Affidavit in support of my civil disobedience contrary to all COVID-19 related restrictions and “safety” measures that infringe my rights/freedoms, and for no improper purpose.

SWORN BEFORE ME in person at the )  
City of Markham in the Province of Ontario, )  
on February 18, 2021. )  
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**Signature of Commissioner**  
**NIRMALA ARMSTRONG**  
**LSO #37487F**

  
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**Signature of Deponent**  
**WILLIAM ADAMSON SKELLY**

**ADAMSON BARBECUE LIMITED  
AND WILLIAM ADAMSON SKELLY**  
Applicants

and

**HER MAJESTY THE QUEEN IN  
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Respondent

Court File No.  
CV-20-00652216-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceedings commenced at the City of Toronto

**AFFIDAVIT OF  
WILLIAM ADAMSON SKELLY**  
(Sworn on February 18, 2021)

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