

File No. CI 20-01-29284

**THE QUEEN'S BENCH**  
Winnipeg Centre

APPLICATION UNDER: *The Constitutional Questions Act, C.C.S.M., c. 180*

AND UNDER: The Court of Queen's Bench Rules, M.R. 553/88

IN THE MATTER OF: *The Public Health Act, C.C.S.M. c. P210*

BETWEEN:

**GATEWAY BIBLE BAPTIST CHURCH, PEMBINA VALLEY BAPTIST  
CHURCH, REDEEMING GRACE BIBLE CHURCH, THOMAS REMPEL,  
GRACE COVENANT CHURCH, SLAVIC BAPTIST CHURCH, CHRISTIAN  
CHURCH OF MORDEN, BIBLE BAPTIST CHURCH, TOBIAS TISSEN,  
ROSS MACKAY**

Applicants,

– and –

**HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINCE OF  
MANITOBA, DR. BRENT ROUSSIN in his capacity as CHIEF PUBLIC  
HEALTH OFFICER OF MANITOBA, and DR. JAZZ ATWAL in his capacity  
as ACTING DEPUTY CHIEF OFFICER OF HEALTH MANITOBA**

Respondents.

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**AFFIDAVIT OF CHRISTOPHER LOWE  
SWORN MARCH 25, 2021**

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**JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS  
D. Jared Brown / Allison Kindle Pejovic / Jay Cameron**



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Applicants,

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**AFFIDAVIT OF CHRISTOPHER LOWE**

I, CHRISTOPHER LOWE of the City of THOMPSON, in the Province of Manitoba,

MAKE OATH AND SAY AS FOLLOWS:

1. I have personal knowledge of the facts and matters hereinafter deposed to by me, except where same are stated to be based upon information and belief, and those I do verily believe to be true.

2. I write this affidavit in response to the affidavits filed by the Respondents in this matter.

3. In Mr. Szilveszter Jozsef Komlodi's affidavit, he references online mental health supports, such as "Care for Your Mental Health" and "Help Next Door" provided by the Government of Manitoba. He also attaches information about online recreational activities that Manitobans can do at home.

4. Reviewing Mr. Komlodi's affidavit revealed some unknown mental health supports, which I had not discovered until I reviewed this document. Despite the drastic measures implemented, i.e. the Public Health Orders, the Respondents did not communicate with me or contact my church to ascertain those Orders' impact on the faith community or offer alternatives or supports.

5. In my view, no amount of funding to stay home or "temporary" online solutions can replace the dignity and value that one receives in working or practicing one's faith and engaging with one another. I experienced days of deep despair by the inability to properly care for, interact with, and worship corporately with our congregation's parishioners. I could not pray with those infirmed or even socialize with those to rejoice in their positive life events. I love those who attend our church, and the gathering restrictions took a significant toll upon me, even evidenced by a lack of desire to get out of bed. My marriage experienced increased stress and anxiety over being limited in our exposure to others.

