

FEB 11, 2005 14:03 VICS

1-250-381-8423

Page 1



Kenneth A. Stevenson, Q.C.  
Robert F. Thornton, Q.C.  
Beaty F. Beaubier, B.Comm., LL.B.  
Terry J. Zakraski, B.A., LL.B.\*  
Cathleen J. Edwards, B.Comm., LL.B.\*

William F.J. Hood, B.Comm., LL.B.  
Lucille Lamb, B.Ed., LL.B.\*  
Timothy W. Hodgson, LL.B.  
William P. Langen, B.A., LL.B.  
Janel L. Stevens, B.A., LL.B.

\* Reg. Trademark Agent  
\* Also Member of Alberta Bar

\* Mediator

Our File: 34448011  
e-mail: [whood@shthb-law.com](mailto:whood@shthb-law.com)

February 10, 2005

Via E-mail  
[access@safeaccess.ca](mailto:access@safeaccess.ca)  
(Original Via Registered Mail)

**CEASE & DESIST**

CANADIANS FOR SAFE ACCESS  
130 - 2017A Cadboro Road  
Victoria BC V8R 5G4

Attention: Phillip Lucas

Dear Sir:

Re: **Canadians for Safe Access ("CFSA")  
Publication of Defamatory Libel  
Regarding Prairie Plant Systems Inc. ("Prairie Plant Systems")**

We are solicitors for Prairie Plant Systems in regard to the above-noted matter. Our client has brought to our attention you and your organization's sustained and malicious campaign to damage our client's business reputation and the reputation of its products. The latest publication is your "Open Letter of Concern for the Health and Safety of Canada's Medicinal Cannabis Community" dated January 1, 2005 and published on your website, [www.safeaccess.ca](http://www.safeaccess.ca), and sent to Members of Parliament and Senators.

While anyone is entitled to express their views on a particular topic you are however, not entitled to publish false and misleading information which harms Prairie Plant Systems' reputation. Statements made by you about our client and its product that are clearly false and/or misleading are as follows:

1. Your suggestion that the content and potency of medical marijuana produced by Prairie Plant Systems is other than as reported on the package label;
2. Your claim that Prairie Plant Systems' product has high levels of heavy metals;
3. Your claim that Prairie Plant Systems' product has high levels of heavy metals because it is produced near Flin Flon, Manitoba;
4. Your claim that independent tests show Prairie Plant Systems' product to have "alarmingly high level of biological impurities"; and

FEB 11, 2005 14:03 VICS

1-250-381-8423

Page 2

- 2 -

5. Your claim that Prairie Plant Systems' product is unsafe because of the use of gamma irradiation.

Our client's response is particularized in its Response dated January 27, 2005.

Our client is a leader in the field of plant-made pharmaceuticals. The federal government contract to produce clinical grade marijuana is only one of its many contracts, and your defaming and false statements impact all parts of its business. Our client demands that you immediately remove your defamatory statements about it from your website and that you cease publishing such statements in the future. Should you neglect to cease and desist (to this request) our client intends to pursue all legal remedies available to it.

Yours truly,

**STEVENSON HOOD THORNTON BEAUBIER LLP**



Per:

William F.J. Hood

:sjb

Encl.

cc: Prairie Plant Systems Inc.

\*SABRA WOOD DAILY 1/17/2005-11:43:02 AM

Document Released Under the Access to Information Act / Document divulgué en vertu de la Loi sur l'accès à l'information.

s.19(1)

s.20(1)(b)

s.20(1)(c)

+ pages  
1-4



Yolande Larose  
2005-01-04 03:51 PM

To: 'Brent Zettl' <bhz@prairieplant.com>, Jacques Cloutier  
cc: 'Jacques Cloutier' <Jacques.Cloutier@hc-sc.gc.ca>, Richard  
Viau/HC-SC/GC/CA@HWC,  
Subject: Re: website CSA

Thank you for the update. Jacques will be back at the office next week. Please note that the Cof A posted on CSA website is unreadable once printed. In any case, just to let you know, H34 material for which there is the highest microbial count reported was not irradiated being a bulk harvest. It has not been considered for packaging into finished product.

The revised Product Information Sheets have been processed today for posting on HC website. This should be done within the next day or so. In addition all the laboratory results from metal and microbial analysis for Lot 3 currently distributed will be posted on HC website (testing ongoing during Holiday season - I need to follow up with Larry).

Finally HC is working on a response to address CSA concerns regarding aflatoxins and by-products generated from irradiation gamma. had contacted Richard on December 1 in relation to these issues / concerns.

PS: The AT! office is the one who makes the decision. DAS can only strongly recommend not to disclose.

Yolande Larose, Ph.D.  
Drug Analysis Service  
Drug Strategy and Controlled Substances Directorate  
Tel (613) 948-7795  
Fax (613) 941-8585

Don Hrytzak <dhrytzak@sasktel.net>



2005-01-04 03:05 PM

To: 'Yolande Larose' <Yolande\_Larose@hc-sc.gc.ca>  
cc: 'Jacques Cloutier' <Jacques.Cloutier@hc-sc.gc.ca>, 'Brent Zettl' <bhz@prairieplant.com>  
Subject:

[IMAGE]

Yolande/Jacques:

Please refer to the websites below. It is not difficult to understand why we are extremely adverse to release of information. It is being misconstrued and being used to form create arguments based on 1/2 truths.

Document Released Under the Access to Information Act / Document divulgué en vertu de la Loi sur l'accès à l'information.

<http://safeaccess.ca/research/flinflon/aflatoxins.htm>

<http://safeaccess.ca/pr/mmarfoi.pdf>

s.19(1)

s.20(1)(b)

s.20(1)(c)

Prairie Plant Systems

Phone:

Fax: 306-975-0440



- image001.jpg

Document Released Under the Access to Information Act / Document divulgué en vertu de la Loi sur l'accès à l'information.



Brent Zetli  
<bhz@prairieplant.com>  
>

To: Yolande Larose <Yolande\_Larose@hc-sc.gc.ca>  
cc:  
Subject: Re: Cease and Desist - Mr. Lucas

2005-01-28 05:58 PM

Hi Yolande,

We will wait until we hear from you before we send out the attached letters, however we are eager to wrap this up. Regards Brent

Yolande Larose wrote:

>Brent, we understand your position. However DO NOT release the documents  
>before we have completed a detailed review of the documents especially your  
>response.  
>

>We will get back to you early next week. Please confirm receipt of this  
>email ASAP.

>Regards,

s.20(1)(b)

>Yolande Larose, Ph.D.

s.20(1)(c)

>Drug Analysis Service

>Drug Strategy and Controlled Substances Directorate

>Tel (613) 948-7795

>Fax (613) 941-8585

>

>

>

>

>

>Ph.D."

>

>

>

>Mr. Lucas

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

>

Brent Zetli  
<bhz@prairieplant.com>  
2005-01-28 04:12 PM

To: "Yolande Larose,  
<Yolande\_Larose@hc-sc.gc.ca>  
cc:  
Subject: Cease and Desist -

>Please find attached the Cease and Desist Order (with attachments) for  
>Mr. Lucas and the Canadians for Safe Access. We intend to serve them  
>this Monday, Jan 31/05. Please advise if you see any incomplete and  
>inaccurate information within these documents as soon as possible.  
>Thanks in advance for your attention with this matter. Regards Brent  
>  
>(See attached file: Philip Lucasv3.doc)  
>(See attached file: pps-response-final.doc)  
>  
>  
>

Document Released Under the Access to  
Information Act / Document divulgué en vertu  
de la Loi sur l'accès à l'information.



Yolande Larose  
2005-02-07 06:32 PM

To: Brent Zetti <bhz@prairieplant.com>  
CC:  
Subject: Re: Cease and Desist

Hi Brent, I have finalized my comments only now. See proposed changes to your letter in attached file, including some background info when considered necessary.

I appreciate having had time to go through. Do not hesitate to call for further clarifications, if needed.



pps-response-final\_cmts from HC.

Regards,

Yolande Larose, Ph.D.  
Drug Analysis Service  
Drug Strategy and Controlled Substances Directorate  
Tel (613) 948-7795  
Fax (613) 941-8585

Brent Zetti <bhz@prairieplant.com>



Brent Zetti  
<bhz@prairieplant.com>  
>  
2005-02-07 12:23 PM

To: "Yolande Larose, Ph.D." <Yolande\_Larose@hc-sc.gc.ca>  
CC:  
Subject: Cease and Desist

Good Morning Yolande,

I was wondering if you have had an opportunity to review the Cease and Desist that was emailed to you on Jan 28th as we plan to go forward with sending it to Mr. Lucas later this week. Please let me know as soon as possible. Thank you. Regards Brent