

Alexander Surgenor
Canadian Constitution Foundation
60 Atlantic Avenue
Toronto, ON, M6K 1X9



Mr. Kelly Stienwand
AHS Protective Services
17480 Fort Road
Edmonton, AB, T5Y 6A8

July 31, 2026

Sent via e-mail from asurgenor@theccf.ca to kelly.stienwand@albertahealthservices.ca

RE: Unconstitutional Ban of Mr. Mocha Bezirgan from all Alberta Health Services Facilities

Dear Mr. Stienwand,

I am Counsel with the Canadian Constitution Foundation (the "CCF"). The CCF is a national legal charity that defends Canadians' rights and freedoms, including the freedom of expression protected by section 2(b) of the *Charter of Rights and Freedoms* (the "*Charter*").

The CCF was disturbed to learn that AHS Protective Services ("AHS") banned independent journalist Mr. Mocha Bezirgan from all Alberta Health Services facilities until March 25, 2027. As a government entity, AHS must comply with Canada's constitution and rescind this trespass notice immediately.

Mr. Bezirgan attended the Beaver Lodge Municipal Hospital as a journalist reporting on a story in the public interest on March 25, 2026. As part of the normal course of his reporting, Mr. Bezirgan requested to speak with a doctor. After he was told that the doctor did not wish to speak, he promptly left the premises and waited outside to speak with him after his shift, as is ordinary journalistic practice.

At no point did AHS attempt to get Mr. Bezirgan's side of the story before issuing this overbroad province-wide ban, nor did AHS consider the impact it would have on his or the public's *Charter* rights. Section 2(b) of the *Charter* protects both journalists and the public. This was confirmed by Justice Cory in *Edmonton Journal v. Alberta*, [1989] 2 S.C.R. 1326, where he wrote for a unanimous Supreme Court: "It is only through the press that most individuals can really learn of what is occurring ... members of the public, as "listeners" or "readers", have a right to receive information pertaining to public institutions..."

We await your considered response. Thank you for your attention to this matter.

A handwritten signature in black ink, appearing to read "A. Surgenor", written over a light blue horizontal line.

Alexander Surgenor
Counsel, the Canadian Constitution Foundation

CC: melinda.ando@albertahealthservices.ca; pr@mediabezirgan.com