

COURT OF APPEAL OF ALBERTA

Form 49

COURT OF APPEAL FILE NUMBER: 2501-0254AC
TRIAL COURT FILE NUMBER: 2410-01231
REGISTRY OFFICE: Calgary
PLAINTIFF/APPLICANT: Aaron Brown
STATUS ON APPEAL: Appellant
DEFENDANT/RESPONDENT: His Majesty the King in Right
of Alberta and Recovery
Alberta: Mental Health and
Addiction Services
STATUS ON APPEAL: Respondent



DOCUMENT: **AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR LEAVE TO INTERVENE**

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AFFIDAVIT OF CHRIS GALLAWAY

As Sworn (or Affirmed) on March 6, 2026

I, Chris Gallaway of Edmonton, Alberta, ~~SWEAR/AFFIRM~~ AND SAY THAT:

1. I am the Executive Director of Friends of Medicare (Alberta) ("Friends of Medicare") and I am authorized to make this Affidavit in support of Friends of Medicare's application for leave to intervene in this appeal.
2. I have personal knowledge of the matters set out in this Affidavit, except where stated to be based on information and belief, in which case I believe those matters to be true.

Background and mandate

3. Friends of Medicare is a non-profit, non-partisan coalition of seniors' organizations, labour organizations, cultural, faith and community groups, and physicians and patients.
4. It was formed as a coalition in Edmonton, Alberta in September 1979 in response to mounting threats to Medicare, and has since worked to protect and strengthen universal public health care in Alberta.
5. Friends of Medicare's work is rooted in the foundational principles of Medicare—comprehensiveness, universality, accessibility, portability, and public administration on a non-profit basis—and is directed to system-level impacts of policy and legislation on equitable access to medically necessary care.
6. Friends of Medicare has triaged and consolidated its current priorities into four main focus areas: resisting privatization; improving seniors' care; pursuing universal

pharmacare; and addressing the ongoing drug poisoning crisis through its mental health and addictions work.

Expertise and demonstrated interest relevant to this appeal

7. Friends of Medicare has longstanding experience analyzing Alberta health policy and legislative initiatives that affect the organization, funding, and delivery of health services, including the consequences for equity, transparency, and access.

8. Friends of Medicare has a sustained record of public education, evidence-informed advocacy, and policy analysis concerning mental health and addictions, including the drug poisoning crisis and the availability of timely, evidence-based addiction and mental health supports within Alberta's publicly funded health system.

9. Friends of Medicare has issued public analysis and advocacy concerning:

(a) the Alberta government's introduction of Bill 53: *Compassionate Intervention Act*, including concerns about mandatory treatment orders and involuntary confinement and the need for accessible, evidence-based care (April 2025);

(b) policy responses to drug poisoning deaths and the need for evidence-based care in connection with International Overdose Awareness Day (August 29, 2025); and

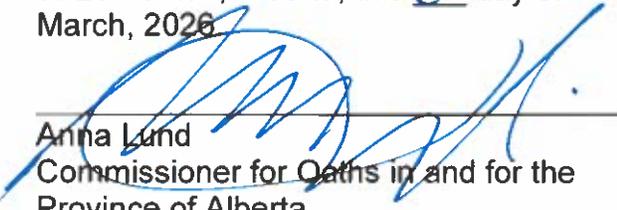
(c) closures of supervised consumption services and the foreseeable impacts on harm, emergency departments, and system pressures (November 19, 2025 and January 2, 2026).

Proposed intervention

10. Friends of Medicare seeks leave to intervene jointly with the Charter Committee on Poverty Issues and the Canadian Health Coalition to provide a public-interest perspective, informed by the organization's extensive experience and expertise, on the Alberta health system context in which the issues on appeal arise, including the mental health and addictions system and the drug poisoning crisis as a core public health issue.
11. Friends of Medicare does not seek to expand the evidentiary record. It will rely on the record as it stands and will make submissions summarized in its Memorandum of Argument in support of this application for leave.
12. Friends of Medicare's proposed submissions will not duplicate those of the parties. Rather, Friends of Medicare will offer a distinct perspective on the specific legal questions at issue regarding the scope of *Charter* protections, grounded in decades of Alberta-focused work on equitable access to publicly funded care, including the systemic consequences of delivery-model and policy choices for medically vulnerable and marginalized persons.
13. Friends of Medicare has no direct pecuniary interest in the outcome of this appeal. Its interest is the public importance of the issues raised and the potential consequences for equitable access to medically necessary health services in Alberta, including mental health and addictions services.

14. I make this Affidavit in support of Friends of Medicare's application for leave to intervene jointly with the Charter Committee on Poverty Issues and the Canadian Health Coalition.

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~~SWORN~~ (OR AFFIRMED) BEFORE ME)
at Edmonton, Alberta, this 6th day of)
March, 2026.)



Anna Lund)
Commissioner for Oaths in and for the)
Province of Alberta)

 **Anna J. Lund**
Barrister & Solicitor)



Chris Gallaway)