
****[Law Firm Name]****

****[Address]****

****[City, Province, Postal Code]****

****[Phone Number]****

****[Email Address]****

****[Date]****

****[Court Name]****

****[Court Address]****

****[City, Province, Postal Code]****

****Re: Class Action Complaint****

****Plaintiff(s):**** [Plaintiff Name(s)]

****Defendant(s):**** [Defendant Name(s)]

****Case No.:**** [Case Number, if available]

****CLASS ACTION COMPLAINT****

****INTRODUCTION****

1. This is a class action lawsuit brought by the Plaintiff(s) on behalf of themselves and all others similarly situated against [Defendant Name(s)] for the manufacture, distribution, and sale of non-organic tobacco products containing harmful substances without adequate warning to consumers.

****PARTIES****

2. ****Plaintiff(s):**** [Plaintiff Name(s)], residents of [City, Province], who purchased and used non-organic tobacco products manufactured by the Defendant(s).

3. ****Defendant(s):**** [Defendant Name(s)], companies engaged in the business of manufacturing, distributing, and selling tobacco products across Canada.

****JURISDICTION AND VENUE****

4. This Court has jurisdiction over this class action pursuant to the laws of Canada, as the Defendant(s) conduct substantial business within this jurisdiction.

5. Venue is proper in this Court as the wrongful conduct complained of herein occurred in this judicial district, and the Defendant(s) are subject to personal jurisdiction in this district.

****FACTUAL ALLEGATIONS****

6. The Defendant(s) have engaged in the manufacture, distribution, and sale of non-organic tobacco products across Canada.

7. Non-organic tobacco products contain harmful substances including but not limited to pesticides, heavy metals, and other toxic chemicals .

8. The Defendant(s) failed to disclose the presence of these harmful substances to consumers and did not provide adequate warnings regarding the health risks associated with the use of non-organic tobacco products .

9. As a result of the Defendant(s)' actions, the Plaintiff(s) and Class Members have suffered physical harm, economic loss, and other damages.

****CLASS ACTION ALLEGATIONS****

10. Plaintiff(s) bring this action on behalf of themselves and all others similarly situated under Rule 334.16 of the Federal Courts Rules.

11. The Class is defined as: All persons in Canada who purchased and/or used non-organic tobacco products manufactured, distributed, or sold by the Defendant(s).

12. The members of the Class are so numerous that joinder of all members is impracticable.

13. There are questions of law and fact common to the Class, including but not limited to:

a. Whether the Defendant(s) failed to disclose the presence of harmful substances in their non-organic tobacco products;

b. Whether the Defendant(s) failed to provide adequate warnings about the risks associated with their products;

c. Whether the Defendant(s)' actions violated Canadian consumer protection laws;

d. The appropriate measure of damages.

****CAUSES OF ACTION****

****Count I: Violation of Consumer Protection Laws****

14. Plaintiff(s) incorporate by reference all preceding paragraphs.

15. The Defendant(s)' conduct as alleged herein constitutes a violation of Canadian consumer protection laws, including the Competition Act, which prohibits false or misleading representations to the public .

****Count II: Negligence****

16. Plaintiff(s) incorporate by reference all preceding paragraphs.

17. The Defendant(s) owed a duty to the Plaintiff(s) and Class Members to ensure that their tobacco products were safe for use.

18. The Defendant(s) breached this duty by failing to disclose the presence of harmful substances and failing to provide adequate warnings.

19. As a direct and proximate result of the Defendant(s)' negligence, Plaintiff(s) and Class Members have suffered injuries and damages.

****PRAYER FOR RELIEF****

WHEREFORE, Plaintiff(s) and the Class demand judgment against Defendant(s) as follows:

- a. Certification of the Class;
- b. Compensatory damages in an amount to be determined at trial;
- c. Punitive damages;
- d. Costs and expenses, including attorneys' fees;
- e. Pre- and post-judgment interest;
- f. Such other and further relief as this Court may deem just and proper.

****DEMAND FOR JURY TRIAL****

Plaintiff(s) hereby demand a trial by jury on all issues so triable.

****[Plaintiff Attorney's Name]****

****[Plaintiff Attorney's Signature]****

****Scientific Citations:****

1. [Health Canada - Toxic Chemicals in Tobacco Products](<https://www.canada.ca/en/health-canada/services/smoking-tobacco/tobacco-products/health-effects/tobacco-related-chemical.html>)
2. [Journal of Environmental Health - Pesticides in Tobacco](<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3564648/>)
3. [Canadian Public Health Association - Health Risks of Non-Organic Tobacco](<https://www.cpha.ca/tobacco-control-and-public-health>)

4. [Government of Canada - Competition Act](https://laws-lois.justice.gc.ca/eng/acts/c-34/index.html).