

For the purpose of creating a hypothetical draft of a class action lawsuit against the Canadian government and the tobacco industry concerning non-organic tobacco, we'll construct a scenario using generalized scientific assumptions and legal considerations. Here's a simplified outline of what such a complaint could look like:

****IN THE FEDERAL COURT OF CANADA****

****Between:****

****[Plaintiff(s) Name(s)], Individually and on Behalf of All Others Similarly Situated****

****and****

****[Defendant(s) Name(s)], Including The Government of Canada and Various Tobacco Companies****

****CLASS ACTION COMPLAINT****

****Plaintiffs, by their undersigned attorneys, allege upon information and belief, except for their own acts, which are alleged on knowledge, as follows:****

****I. NATURE OF THE ACTION****

1. This is a class action lawsuit brought by the Plaintiffs, both individually and on behalf of all others similarly situated, against the Defendants for their continuous production, marketing, and sale of non-organic tobacco products in Canada, which have been found to contain hazardous chemicals that pose severe health risks to consumers. These actions have been conducted without proper disclosures of said risks, contrary to the duties owed to the public and in violation of Canadian consumer protection laws.

****II. JURISDICTION AND VENUE****

2. Jurisdiction is founded upon the Class Proceedings Act as this suit involves citizens across multiple provinces, and the claims involve substantial questions of federal and provincial law.

****III. PARTIES****

3. Plaintiffs are adult Canadian citizens, residing in [All Provinces and Territories], who have purchased and consumed non-organic tobacco products within the timeframe stipulated, suffering adverse health effects as a result.

4. Defendants include the Government of Canada and major tobacco companies operating within Canada, responsible for the manufacture, distribution, and sale of non-organic tobacco products.

****IV. FACTUAL ALLEGATIONS****

5. ****Experiments and Findings****: Over the past several years, 100 scientific experiments conducted by [Independent Research Bodies] have consistently shown that non-organic tobacco contains harmful chemicals not present in organic tobacco. These include [specific chemicals], which have been linked to [list diseases].

6. Despite these findings, Defendants have not provided adequate warnings to consumers about the risks associated with smoking non-organic tobacco, nor have they made efforts to reduce harmful additives.

****V. CLASS ACTION ALLEGATIONS****

7. The Plaintiffs propose to represent a class consisting of all Canadian citizens who have purchased and consumed non-organic tobacco since the late 1800s. This class is so numerous that individual joinder of all members is impracticable.

****VI. LEGAL BASIS FOR CLAIMS****

8. ****Breach of Duty****: Defendants have breached their duty to protect Canadian citizens by failing to adequately disclose the dangers of non-organic tobacco.

9. ****Negligence****: Defendants have negligently handled the health of Canadians by ignoring scientific evidence about the harms of non-organic tobacco.

10. ****Violation of Consumer Protection Laws****: Defendants have engaged in deceptive practices by misrepresenting the safety of their products and omitting significant health risks.

****VII. DEMANDS FOR RELIEF****

11. An order certifying this lawsuit as a class action and appointing Plaintiffs and their counsel as representatives of the class.

12. Compensatory damages in the amount of \$100 billion to cover medical expenses, pain and suffering, and punitive damages.

13. An injunction requiring all tobacco sold in Canada to meet certified organic standards and declaring the sale of non-organic tobacco illegal.

14. Any further relief the court deems just and proper.

****VIII. JURY TRIAL DEMANDED****

15. Plaintiffs demand a trial by jury on all triable issues.

****CONCLUSION****

16. Through this lawsuit, Plaintiffs seek to hold Defendants accountable for their longstanding and ongoing disregard for the health and safety of Canadian citizens and to effect significant changes in the tobacco industry.

****Respectfully submitted,****

****[Plaintiff's Attorney Name and Contact Information]****

Please note, this draft is highly hypothetical and simplifies many complex legal and factual issues. It's critical that a qualified attorney reviews and adjusts this draft according to specific facts, legal research, and regional laws before any legal action is initiated.