

FEDERAL COURT

BETWEEN:

Marc Lemire

Applicant

and

Richard Warman, Canadian Human Rights Commission, Attorney General of Canada,
Canadian Free Speech League, Canadian Association for Free Expression Inc., Canadian
Jewish Congress, The League for Human Rights of B'nai B'rith, Friends of Simon
Wiesenthal Center for Holocaust Studies

Respondents

(APPLICATION UNDER section 37 of the *Canada Evidence Act*, R.S.C. 1985, c. C-5)

APPLICANT'S RECORD

Barbara Kulaszka,
Counsel for the Applicant
Marc Lemire

Part I - Statement of Fact

1. This is an application for judicial review in respect of the decision of the Canadian Human Rights Commission to claim public interest immunity pursuant to section 37(1) of the *Canada Evidence Act*, R.S.C. 1985, c. C-5 (as amended) (hereinafter referred to as the “CEA”) before the Canadian Human Rights Tribunal in the case of *Warman v. Lemire*, No. T1073/5405, on May 9, 10, and 15, 2007. The case involves the hearing of a complaint by Richard Warman against the applicant under section 13 of the *Canadian Human Rights Act*, R.S.C., 1985, c. H-6 (as amended) (hereinafter referred to as the “CHRA”).

Notice of Application, *Record*, pp. 1-5

2. The complaint, laid in November of 2003, alleged that the applicant was discriminating against various protected groups by exposing them to hatred and contempt on his website, *Freedomsite.org* and its online message board. Most of the messages were allegedly written by a person named Craig Harrison and various other unknown persons on the message board.

Fromm Affidavit, Exhibit A, Warman Complaint, *Record*, pp. 13-19

3. Subsequently, Mr. Warman alleged, *inter alia*, that the applicant had posted a message on the message board of the American website *Stormfront.org*, which violated section 13 of the *CHRA*. He also later alleged that the applicant was the webmaster of another website, *jrbooksonline.com*. The applicant denied being the owner and operator of this website. The proof of identity of the owner of *jrbooksonline.com* is therefore a live issue.

Fromm Affidavit, para. 11 – *Record*, p. 9

4. In his defence, the applicant is challenging the constitutionality of section 13 and 54 of the CHRA under the *Canadian Charter of Rights and Freedoms* and the *Bill of Rights*. *Inter alia*, the applicant is arguing that the application of the provision to the Internet, through amendments made in 2001, and the enactment of new and draconian penalty provisions, results in the measure no longer being justifiable in a free and democratic society. He is also arguing that section 13, masquerading as a remedial measure, is in essence a criminal provision enforcing a moral code and authorizing punishment of the offender.

**Fromm Affidavit, Exhibit B, Notice of Motion re Constitutional Issues,
Record, pp. 21-44**

5. The case against the applicant overwhelmingly involves postings by other persons on the Freedomsite.org message board. This is also the case in many other cases before the Tribunal under section 13 of the Canadian Human Rights Act. These cases include *Warman v. Beaumont* (postings on Stormfront message board), *Warman v. Tremaine* (postings on Stormfront message board); *Warman v. Bahr* (postings on Stormfront message board and WesternCanadaforUs message board); and *Warman v. Guille* (Canadian Heritage Alliance message board). The liability of a webmaster such as the applicant for such postings, is a major issue in the case.

Fromm Affidavit, para. 11, *Record*, p. 9

6. In an affidavit sworn on January 12, 2007, Dean Steacy, an investigator for the Canadian Human Rights Commission, swore that from 2001 to the present, the Commission has accepted approximately 55 section 13 complaint in respect to hate on the Internet and that, of these, approximately 25 have been referred to the Tribunal and/or conciliation. He testified at the hearing that he has handled about 15 cases that dealt with messages posted on Internet message boards.

Fromm Affidavit, para. 12, *Record*, p. 9

7. An issue at the very commencement of the Tribunal hearing, was whether or not the complainant himself had posted a racist message on the FreedomSite.org message board just prior to laying his complaint. The applicant was unsuccessful in a motion to have Mr. Warman added as a respondent to the complaint. However, the Tribunal allowed the applicant's motion for a subpoena of Rogers Cable for the subscriber information of the IP address that the applicant alleged was that of Mr. Warman and which would show that he posted the racist message. A motion by Mr. Warman to quash the subpoena was denied. The applicant was also allowed to call expert testimony to establish that the message in question was posted by Mr. Warman. (It was later determined that Rogers Cable no longer had the subscriber information for the time period involved.)

Tribunal transcripts, pp. 176-183 (*ruling on motion to quash subpoena; p. 185 (Klatt opinion)*)
Warman v. Lemire, 2006 CHRT 48 (*ruling on adding Warman as respondent*), Book of Authorities, p. 1

8. In questioning regarding how the applicant's case was investigated on the Internet, Hannya Rizk, the Commission investigator, testified that she had never opened a user account with Stormfront or FreedomSite. She did a search of Stormfront to try to find the alleged posting by the applicant. She could not do so. She testified that she never made postings on message boards as part of her duties at the Commission. Nor was she aware of any rules at the Commission regarding making postings on message boards such as Stormfront.

Tribunal Transcripts, pp. 186-190

9. Dean Steacy, a senior investigator at the Commission, testified that monitoring of Stormfront by viewing content alone would depend on whether there was a complaint about something that was on Stormfront.org or whether or not an individual had posted something on Stormfront. He agreed that viewing of Stormfront would be driven by complaints.

Tribunal transcripts, pp. 191-193

10. Further evidence before the Tribunal concerning message boards showed that the complainant Richard Warman is a prolific poster on the Stormfront and VNN message boards in the United States, using various pseudonyms, posting such messages as one urging people to support an American neo-Nazi known as “Commander Schoep.” Mr. Warman has described the Stormfront website as “a neo-Nazi forum.”

**Tribunal transcripts, pp. 168-169 (“neo-Nazi forum”)
pp. 170-175 (“Commander Schoep”)**

11. Evidence from various other Tribunal hearings involving section 13 of the *CHRA* show that police officers are posting racist messages under pseudonyms on various message boards. In *Warman v. Bahr*, the witness for the Commission was Sgt. Stephen Camp. He admitted under cross-examination that the person posting on Stormfront.org using the pseudonym “Estate” was in fact an Edmonton, Alberta police officer.

**Fromm Affidavit, para. 10, p. 8; Exhibit H (transcript and postings by
Edmonton police using the name “Estate”), pp. 159-166**

12. Examples of postings made by the police officer with the persona “Estate” included the following:

2-12-2004, 12:31 PM

<http://www.stormfront.org/forum/showthread.php?p=886598#post886598>

Remember the Edmontn LRT incident, where a gang of thug injuns attacked and beat a group of whites. Even when it was mentioned that they were yellin, "let;s f.k up the whities" the hate cops refused to say it was a hate crime.

This is all about victimizing the white race. The cops should be investigatied for their discriminatory practices against our race. Maybe a complaint to Canada Human Rights.

11-17-2004 , 12:16 PM

<http://www.stormfront.org/forum/showthread.php?p=1428760#post1428760>

This post again re emphasises the point that our tax dollars are waisted on keeping Zundel behind bars, while Muslim extremists are allowed re entry into Canada , and free to come and go as they please. Excellent post Glenn.

02-11-2004, 05:56 PM

<http://www.stormfront.org/forum/showthread.php?p=885168#post885168>

I can honestly say that my head and guts wrench with this type of hypocritical, disgusting, low and dark Justice system. Like Proud 18 says, we do all the things were supposed to do in society. And what do we get...we get to read a story in the local paper that runs contrary to everything we've been taught. Our justice system is promoting racism at every chance. When we display our love for our race, we get branded as hate mongers. Screw them!

I look for integrity and merit in people, and systems. Our systems integrity is non existent. Revolution? Whatever!

Fromm Affidavit, Exhibit H, pp. 163-166

13. Further evidence with respect to message boards showed that a poster named “Jadewarr” had attempted in 2006 to engage the applicant in conversation on the Stormfront.org message board regarding the Commission’s activities, during the ongoing Tribunal case.

Fromm Affidavit, Exhibit F, pp. 135-139

14. “Jadewarr” also corresponded with another poster on Stormfront named “Fenrisson” who had posted a message urging people to lay endless complaints under section 13 with the Commission for the purpose of bogging down an already overstressed system. “Jadewarr” asked “Fenrisson” how one would go about this without identifying themselves and whether “Fenrisson” had a copy of a prototype letter he could use. The original posting by “Fenrisson” was subsequently used by the Commission to dismiss numerous complaints, including one against Richard Warman, as being vexatious,

notwithstanding that the Commission investigator found that Warman's actions amounted to communicating hate messages.

Fromm Affidavit, Exhibit F, pp. 128 (*Fenrisson post*); pp. 140-145 (*Jadewarr correspondence with Fenrisson*); Exhibit G, pp. 146-157 (*dismissed complaints; finding that Warman communicated hate messages at p.156*)

15. Other evidence showed that in the case of *Warman v. Beaumont* the Commission had entered a document into evidence through the complainant Richard Warman, printed from the Stormfront message board, with the words "Welcome Jadewarr" across the top. Mr. Warman denied that he produced the document but testified that the document came from the Canadian Human Rights Commission. The date on the document was December 8, 2006.

Fromm Affidavit, Exhibit E (*transcript of the relevant parts of the Beaumont hearing concerning "Jadewarr"*), pp. 111-126

16. Mr. Fromm is a regular poster at the Stormfront.org website and is knowledgeable about how to use its message board. When a person signs onto the message board and subsequently prints off material from the site, the website prints the words "Welcome XXX" at the top of the page, the XXX being the pseudonym or name under which the user signs in. The words "Welcome Jadewarr" indicated that the person printing off the document was a registered user of the site using the pseudonym "Jadewarr."

Fromm Affidavit, para. 7, Record, pp. 7-8

17. In March of 2007, the applicant requested and received the email address, IP address, hostname and access to the Stormfront.org website account of "Jadewarr" from the owner of the website, Mr. Don Black. This information showed that "Jadewarr's" IP address was 70.48.181.203; Host Name was bas2-ottawa23-1177597387.dsl.bell.ca; Email address used was jadewarr@yahoo.ca. The date of "Jadewarr's" last activity was December 8, 2006, the same day the document filed in the *Beaumont* case was printed for the Commission's use at that hearing. The applicant brought a motion on May 14, 2007

for a subpoena of Bell Canada's records for subscriber information on this IP address for the date, December 8th, 2006.

Fromm Affidavit, Exhibit D, Record, p. 103-108

18. The Commission responded to this motion on May 15, 2007 by invoking section 37 of the *CEA* on the basis that disclosure would be prejudicial to the Commission's investigative process.

Fromm Affidavit, Exhibit "D", Record, p. 109

19. At the hearing before the Tribunal, on May 9 and 10, 2007, counsel for the applicant questioned Ms. Hannya Rizk and Mr. Dean Steacy, both employees of the Canadian Human Rights Commission. The Commission invoked section 37 of the *CEA* to block all questioning regarding "Jadewarr". The specified public interest was that the disclosure of the information would be prejudicial to the Commission's investigative process.

20. The following questions were not answered as a result:

(a) Do any investigators post on Stormfront.org? (Vol. 21, p. 4716, lines 10-11, **(Record, p. 64)**)

(b) Getting back to Jadewarr, do Commission employees sign up accounts on Stormfront, under pseudonyms such as 'Jadewarr'? (Vol. 21, p. 4828-4829) **(Record, pp. 89-90)**

(c) Do you know who Jadewarr is? (Vol. 21, p. 4829, lines 15-18) **(Record, p. 90)**

(d) To your knowledge, is Jadewarr a Commission employee? (Vol. 21, p. 4833, lines 19-22) **(Record, pp. 94-95)**

(e) As part of your duties, have you ever signed up with a message board and made postings? (Vol. 21, p. 4834, lines 20-23) **(Record, pp. 95-96)**

(f) Do you have your own choice of how you set up an alternate e-mail account, or are you directed to set up an e-mail account with a specific server? (Vo. 21, p. 4712, lines 16-22) **(Record, pp. 60-61)**

Fromm Affidavit, Exhibit C

21. With respect to the merits of the case and the means of identifying a respondent, the Commission invoked section 37 of the *CEA* in response to the following questions:

(a) What kind of investigations would you do, for instance, to verify the identity of a respondent? (Vol. 20,p. 4428, lines 20-22) **(Record, pp. 47-49)**

(b) With respect to the investigation of Mr. Lemire and the FreedomSite, what investigations did you do concerning whether he owned the FreedomSite?...Did you do anything else? (Vol. 20, p. 4428, lines 21-22) **(Record, pp. 49-50)**

(c) Did you undertake any other investigations to determine who owned the FreedomSite? (Vol. 20, 4429-4430) **(Record, pp. 50-53)**

(d) You said that you entered a URL. If you look at page 4, it is from “the-cloak.com.” Could you just say which URL you put in? (Vol. 20, 4483, lines 19-24) **(Record, pp. 54-55)**

22. With respect to cases involving section 13, the Commission invoked section 37 of the *CEA* in response to the following question:

The ones that went to Tribunal, could you name those cases? (Vol. 21, p. 4700, lines 4-5) **(Record, pp. 57-58)**

23. The Commission has used evidence from police officers in three Tribunal hearings having eight named respondents where the identity of the persons making the Internet postings was at issue. The evidence of the police was given to establish the identities of the respondents and/or their responsibility for making the complained of postings. The evidence was gathered pursuant to search warrants issued under the *Criminal Code* and/or work done during criminal investigations.

Warman v. Kulbashian, Richardson, Tri-City Skins.com, Canadian Ethnic Cleansing Team, and Affordable Space.com [2006] CHRT 11; Book of Authorities, p. 250

Warman v. Western Canada for US and Bahr [2006] CHRT 52; Book of Authorities, p. 243

Warman v. Kouba [2006] CHRT 50; Book of Authorities, p. 237

24. With respect to the relationship of the Commission to police forces in section 13 cases, the Commission invoked section 37 of the *CEA* on the grounds that disclosure would prejudice the investigations and operations of the Commission as well as potential criminal investigations. The following questions were not answered:

(a) How did you obtain this evidence from Police Officer Terry Wilson? (Vol. 21, p. 4748, lines 19-20) (**Record, pp. 80-81**)

(b) What is the relationship between the police and the Commission in these types of cases? (Vol. 21, p. 4752, lines 7-12) (**Record, p. 82**)

(c) Is there any kind of oral agreement? [with police forces on the sharing of information] What is that? (Vol. 21, p. 4754, lines 12-23) (**Record, pp. 83-84**)

(d) Have you been refused information [from police forces]? What kind of information? (Vol. 21, p. 4758-4759) (**Record, pp. 87-88**)

Fromm Affidavit, Exhibit C

25. The respondent in argument will be referring to all of the transcript pages attached to Mr. Fromm's affidavit for the full context of the questions.

Part II – Points in Issue

26. The points in issue are the following:

(a) Does disclosure of the information sought encroach upon the specified public interest;

(b) Alternatively, does the public interest in disclosure outweigh in importance the specific public interest, thereby justifying disclosure.

Part III – Submissions

27. "Public interest privilege recognizes that information should not be disclosed when its disclosure would be contrary to the "public interest". In gauging what is in the public interest, however, there is often competition between the public interest in obtaining disclosure and the public interest in resisting disclosure. Inevitably, public interest privilege requires a balancing of competing values and interests. Because there are many types of information that deserve protection, public interest privilege provides a broad umbrella to shelter various types of confidential information."

Hubbard, Magotiaux, Duncan, "The Law of Privilege in Canada", Canada Law Book, 2007 at 3.10

28. The public interest relied upon by the Commission is that of secrecy of investigative techniques. This applied to every question asked and also to the proposed subpoena of Bell Canada. In addition, the Commission relied on the public interest in the secrecy of criminal investigations with respect to the question regarding police agreements with the Commission.

29. In “The Law of Privilege in Canada”, *supra*, the learned authors state with respect to investigative privilege:

“Investigative privilege is a recognized category of public interest privilege under both s. 37 and the common law. [...] Common law public interest privilege therefore may be invoked to protect a **genuine police interest** in maintaining secrecy in respect of **ongoing** investigations, **ongoing** investigative techniques and devices, and those persons who may be involved in investigations. Whether the legitimate interest of the accused in disclosure of the information sought outweighs the public’s interest in secrecy is determined on a case-by-case basis in the context of specific facts.” (p. 3-45) (*emphasis added*)

30. The Canadian Human Rights Commission is an agency established pursuant to section 26 of the *CHRA*. Its powers and mandate are set out in section 27 of the Act. Generally, its mandate is to be responsible for the administration of the statute, including handling complaints of discrimination and taking measures to discourage and reduce discriminatory practices.

31. In *Canada (Human Rights Commission) v. Taylor*, [1990] 3 S.C.R. 892 at page 917, the Supreme Court of Canada held that the *CHRA*, and section 13, is remedial legislation.

It is essential, however, to recognize that, as an instrument especially designed to prevent the spread of prejudice and to foster tolerance and equality in the community, the *Canadian Human Rights Act* is very different from the *Criminal Code*. The aim of human rights legislation, and of s. 13(1), is not to bring the full force of the state's power against a blameworthy individual for the purpose of imposing punishment. Instead, provisions found in human rights statutes generally operate in a less confrontational manner, allowing for a conciliatory settlement if possible and, where discrimination exists, gearing remedial responses more towards compensating the victim.

32. In 2001, the Commission was given jurisdiction under section 13 over the Internet in the *Anti-Terrorism Act*, passed in the wake of the attacks in New York on September 11, 2001. The legislation as it existed prior to the *Anti-Terrorism Act* restricted section 13 to telephone answering machines. While the penalty for violation of section 13 at the time of *Taylor* was a cease and desist order, the legislation today under section 54 (1) and (1.1) provides for the imposition of large fines. The willfulness and intent of the respondent must be taken into account in assessing whether a penalty should be imposed and the amount thereof.

33. The Commission is not a police agency although it has powers of investigation as set out in section 43 of the Act “to investigate a complaint.” It has no power to undertake surveillance of Canadians on the Internet, undercover operations, general monitoring of the activities of Canadians or others on message boards, or any type of activity which is not open and public and identifiable as that of the Commission. Its process is complaint driven.

34. The Commission’s statutory mandate is to be a **public** advocate for human rights and to investigate complaints. Investigator Dean Steacy testified that monitoring of Stormfront, for instance, was complaint driven and would only be looked at in response to a complaint. Hannya Rizk testified that she never registered an account on a message board or made postings as part of her duties as an investigator.

35. It is submitted that the privilege regarding investigative techniques is restricted to ongoing police investigations, or investigative techniques used for ongoing and future investigations which must remain secret to be effective. In this case, the Commission is not a police agency entitled to claim this privilege. It is an agency mandated to further human rights and to investigate alleged violations of human rights in an open and transparent manner.

36. Moreover, there is no evidence that “Jadewarr” was investigating a complaint. Instead, “Jadewarr” was using his account to print off postings for use in a case before the Tribunal; he was trying to engage in a discussion with the applicant about complaints the applicant had made to the Commission under section 13 and he was attempting to get information from another poster named “Fenrisson” about laying complaints with the Commission.

37. If “Jadewarr” is a Commission employee, what else was he doing? Did he have an account on the FreedomSite.org message board? Did he post messages on it? Do Commission employees participate on message boards, including the one at issue in the applicant’s case? These are relevant and important questions to determine whether a webmaster should be held liable for messages on a message board, written by others, when it is possible that Commission employees themselves have participated on the message board. The testimony of the investigators at the Commission was clear that they do not undertake such activities as part of their work. So who is “Jadewarr”?

38. It is not a secret that police services are using false identities on message boards to find out who various posters are. These techniques have been testified about in section 13 cases before the Tribunal. But the Commission is not a police agency. It uses police, however, in cases where it appears it cannot prove the identity of respondents. Police powers of search and seizure of computers, search warrants on people’s homes, Motor Vehicle Record searches, CPIC, (Canadian Police Information Centre) searches, infiltration of Stormfront using false identities, infiltration of internet based mailing lists, assuming phony identities via e-mail, interrogations after arrest and infiltration of public meetings and demonstrations are all police investigative techniques that have been tapped by the Commission indirectly when they use police officers as witnesses at Tribunal hearings. Police have extensively testified in cases before the Tribunal on these very techniques and how they were used to identify individuals. They are not secret.

39. The Lemire case raises the important issues of the liability of a webmaster for messages posted on a message board under section 13 of the *CHRA* which he did not

write. If police, Commission employees and persons such as Richard Warman are posting racist messages on message boards of what they see as anti-immigration, anti-multiculturalism websites, then it is a gross abuse of the *CHRA* and goes to the effect of this legislation on the *Charter* guarantees of freedom of speech and conscience and the fairness of the proceedings.

40. A webmaster cannot monitor all postings on message boards which may number in the thousands. To hold him responsible for such postings, subject him to a cease and desist order for the rest of his life and subject him to large fines, is in the applicant's submission, a violation of the *Charter*. It is vital to the *Charter* argument to explore what actions the Commission has been taking on message boards, especially when it appears that such a Commission employee was attempting to initiate a conversation with the applicant as his case before the Tribunal was ongoing. The public interest in disclosure of this information outweighs any public interest in the secrecy of the Commission's actions.

41. The constitutionality of section 13 and its penalty provision are challenged on the grounds, *inter alia*, that section 13 is not a "remedial" provision any longer, given the new penalty provision. It is relevant to these issues that the Commission is using police evidence obtained using police powers extensively in section 13 cases before Tribunals. It raises the issue of what relationship the Commission has with the police behind the scenes. Such evidence is relevant to show that section 13 no longer is a civil provision having a remedial purpose. It has morphed into a criminal provision where police powers are being used indirectly by the Commission.

42. In using police resources, the Commission thereby gains access to evidence gained by: surveillance conducted on rallies organized by an Internet poster; computerized checks on the Motor Vehicle Registry to trace a poster's identity (by matching photos); checks on the Canadian Police Information Centre (CPIC) to trace a poster's identity; evidence from seized computers analysed by police officers specializing in electronic evidence; police statements; interrogation transcripts and evidence obtained while

executing search warrants. (*Kouba, Bahr and Kulbashian* cases) It is submitted that the respondent should have the full right to explore this relationship with the police by the Commission. Are the rights of individuals under the *Charter* being compromised by this police/Commission relationship regarding alleged hate crimes/section 13 investigations? Does this relationship indicate that section 13 in its present form cannot be justified in a free and democratic society under the *Charter*?

43. Lastly, the way in which the Commission investigates the identity of posters of messages on the Internet is directly in issue in this case, as the applicant denies being the owner and operator of jrbooksonline.com. There should be no secrecy in how the Commission investigates the identity of a respondent, particularly during the hearing of the complaint. In other cases, the police and Richard Warman have freely stated in open testimony what steps they took in order to determine the identity of an Internet poster. The objections made by the Commission in this case are an anomaly in section 13 hearings. No public interest is being protected by these objections.

44. The Commission also blocked a question concerning the names of a case before the Tribunal regarding complaints made under section 13 of postings made on AOL. As part of the constitutional challenge, the applicant called the evidence of Paul Fromm who testified regarding persons subject to section 13 complaints as a means of showing how this law has been used and against whom. There is no reason to block the disclosure of the names of public Tribunal hearings that are dealing with section 13. This is particularly so when the cases deal with the AOL message board. The evidence is strongly relevant to the constitutional argument and to the issue of the liability of a message board webmaster.

45. It is respectfully submitted that in all instances, the injury to the public interest which might arise from disclosure does not outweigh the injury which arises from non-disclosure. To effectively perform its statutory duty, the Commission does not require that this information be kept secret.

46. The onus rests on the Commission to satisfy this Honourable Court that the public interest demands that disclosure not be made. In this case, the Commission has failed to provide even an affidavit in support of its position. It is respectfully submitted that it has failed to fulfill the burden upon it.

R. v. Kim (2003), 349 AR 103; [2003] AJ No 1553 (Q.L.)

Part IV – Order Sought

47. The applicant requests an order authorizing the disclosure of the information requested at the hearing and the information requested in the proposed subpoena of Bell Canada, the costs of this application and such further and other relief as this Honourable Court may order.

DATED this 27th day of August, 2007.

Barbara Kulaszka
Counsel for the Applicant Marc Lemire

Part V – List of Authorities

Canada (Human Rights Commission) v. Taylor, [1990] 3 S.C.R. 892

Hubbard, Magotiaux, Duncan, “The Law of Privilege in Canada”, Canada Law Book, 2007

R. v. Kim (2003), 349 AR 103; [2003] AJ No 1553 (Q.L.)

Warman v. Kouba [2006] CHRT 50

Warman v. Kulbashian, Richardson, Tri-City Skins.com, Canadian Ethnic Cleansing Team, and Affordable Space.com [2006] CHRT 11

Warman v. Western Canada for US and Bahr [2006] CHRT 52

Canada Evidence Act, R.S.C. 1985, c. C-5

Canadian Human Rights Act, R.S.C. 1985, c. H-6