SCC File No. 38870

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE COURT OF APPEAL FOR ONTARIO)

BETWEEN:

HER MAJESTY THE QUEEN

Appellant
(Respondent)

– and –

THOMAS SLATTER

Respondent
(Appellant)

– and –

CANADIAN ASSOCIATION FOR COMMUNITY LIVING, WOMEN'S LEGAL EDUCATION AND ACTION FUND INC., DISABLED WOMEN'S NETWORK CANADA, ARCH DISABILITY LAW CENTRE, BARBARA SCHLIFER COMMEMORATIVE CLINIC and CRIMINAL LAWYERS' ASSOCIATION

Interveners

FACTUM OF THE INTERVENERS, WOMEN'S LEGAL EDUCATION AND ACTION FUND INC., DISABLED WOMEN'S NETWORK CANADA and ARCH DISABILITY LAW CENTRE

(Pursuant to Rules 37 and 42 of the *Rules of the Supreme Court of Canada*, S.O.R./2002-156)

Fraser Advocacy
31 Prince Arthur Avenue
Toronto, ON M5R 1B2

Suzan E. Fraser
Tel: 416.703.9555
Fax: 877.704.0348
Email: fraser@fraseradvocacy.com

ARCH Disability Law Centre
55 University Avenue, 15th Floor
Toronto, ON M5J 2H7

Kerri Joffe
Tel: 416.482.8255, Ext. 2222
Fax: 416.482.2981
Email: joffek@lao.on.ca

Counsel for the Interveners,
Women's Legal Education and Action Fund,
DisAbled Women's Network Canada and
ARCH Disability Law Centre

Borden Ladner Gervais LLP
1300 –100 Queen Street
Ottawa, ON K1P 1J9

Nadia Effendi
Tel: 613.787.3562
Fax: 613.230.8842
Email: neffendi@blg.com

Ottawa Agent for the Interveners,
Women's Legal Education and Action Fund,
DisAbled Women's Network Canada and
ARCH Disability Law Centre

ORIGINAL TO: **Registrar**
Supreme Court of Canada
301 Wellington Street
Ottawa, ON K1A 0J1

COPY TO:

Attorney General of Ontario
Crown Law Office – Criminal
720 Bay Street, 10th Floor
Toronto, ON M7A 2S9

Jamie C. Klukach
Caitlin Sharawy
Tel: 416.326.4600
Fax: 416.326.4656
Email: jamie.klukach@ontario.ca
caitlin.sharawy@ontario.ca

Counsel for the Appellant,
Attorney General of Ontario

Borden Ladner Gervais LLP
World Exchange Plaza
1300 –100 Queen Street
Ottawa, ON K1P 1J9

Nadia Effendi

Tel: 613.787.3562
Fax: 613.230.8842
Email: neffend@blg.com

Ottawa Agent for the Appellant,
Attorney General of Ontario

Reynolds O'Brien LLP
183 Front Street
P.O. Box 1327, Station Main
Belleville, ON K8N 5J1

Robert J. Reynolds
Tel: 613.966.3031
Fax: 613.966.2390
Email: rreynolds@reynoldsobrien.com

Counsel for the Respondent,
Thomas Slatter

Gowling WLG (Canada) LLP
2600 – 160 Elgin Street
P.O. Box 466, Station A
Ottawa, ON K1P 1C3

Matthew Estabrooks
Tel: 613.786.2011
Fax: 613.788.3587
Email: matthew.estabrooks@gowlingwlg.com

Ottawa Agent for the Respondent,
Thomas Slatter

University of British Columbia
Peter A. Allard School of Law
1822 East Mall
Vancouver, BC V6T 1Z1

Janine Benedet
Tel: 604.822.0637
Fax: 604.822.8108
Email: benedet@allard.ubc.ca

Counsel for the Intervener,
Canadian Association for Community Living

Supreme Law Group
900 – 275 Slater Street
Ottawa, ON K1P 5H9

Moira Dillon
Tel: 613.691.1224
Fax: 613.691.1338
Email: mdillon@supremelawgroup.ca

Ottawa Agent for the Intervener,
Canadian Association for Community Living

Barbra Schlifer Commemorative Clinic
503 - 489 College Street
Toronto, ON M6G 1A5

Deepa Mattoo
Tamar Witelson
Tel: 416.323.9149 Ext: 244
Fax: 416.323.9107
Email: dmattoo@schliferclinic.com
t.witelson@schliferclinic.com

Counsel for the Intervener,
Barbra Schlifer Commemorative Clinic

Borden Ladner Gervais LLP
1300 –100 Queen Street
Ottawa, ON K1P 1J9

Nadia Effendi

Tel: 613.787.3562
Fax: 613.230.8842
Email: neffend@blg.com

Ottawa Agent for the Intervener,
Barbra Schlifer Commemorative Clinic

Henein Hutchison LLP
235 King Street East, First Floor
Toronto, ON M5A 1J9

Matthew R. Gourlay
Tel: 416.368.5000
Fax: 416.368.6640
Email: mgourlay@hhllp.ca

Counsel for the Intervener,
Criminal Lawyers' Association of Ontario

Supreme Advocacy LLP
100- 340 Gilmour Street
Ottawa, ON K2P 0R3

Marie-France Major
Tel: 613.695.8855 Ext: 102
Fax: 613.695.8580
Email: mfmajor@supremeadvocacy.ca

Ottawa Agent for the Intervener,
Criminal Lawyers' Association of Ontario

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PART I – OVERVIEW AND STATEMENT OF FACTS

A. Overview

1. "Sexual assault is an evil" and too often its victims are women and girls labelled with intellectual disabilities.[1] Parliament and this Court have taken steps to dismantle barriers to access to justice for persons labelled with intellectual disabilities. However, in this appeal, the majority decision of the Court of Appeal for Ontario erects a new barrier by creating a more onerous standard for the assessment of a complainant's reliability when she is labelled with an intellectual disability.

2. Together, the Women's Legal Education and Action Fund Inc., DisAbled Women's Network Canada and ARCH Disability Law Centre ("LEAF-DAWN-ARCH") intervene in this appeal to provide this Honourable Court with an intersectional equality analysis of the Court of Appeal's decision, and its access to justice implications for women labelled with intellectual disabilities. Intersectional discrimination describes the distinct form of oppression that occurs when a person experiences discrimination based on more than one immutable characteristic.[2] In this appeal, the complainant, J.M., is a woman who is labelled with an intellectual disability. LEAF-DAWN-ARCH will show the ways in which generalizations and stereotypes about women labelled with intellectual disabilities contribute to their marginalization in the criminal justice system.

3. LEAF-DAWN-ARCH assert that the majority decision of the Court of Appeal departs from well-established jurisprudence regarding sufficiency of reasons by focusing on a generalization about the suggestibility of persons labelled with intellectual disabilities. The majority decision fails to defer to the trial judge's factual findings as precedent demands. Instead, it imposes a seemingly more onerous standard for the assessment of the complainant's evidence by requiring that the trial judge expressly assess her suggestibility. Underpinning this requirement is a generalization, parsed from the whole of the expert's evidence, that all persons labelled with intellectual disabilities are more suggestible.

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[1] *R v DAI*, 2012 SCC 5 at para 1; *R v Goldfinch*, 2019 SCC 38 at para 37.
[2] Carol A. Aylward, "Intersectionality: Crossing the Theoretical and Praxis Divide" (2010) 1:1 Journal of Critical Race Inquiry 1.

4. The majority's focus on this generalization reinforces harmful stereotypes that silence women labelled with intellectual disabilities in the criminal justice system. This approach is contrary to substantive equality, which requires an individualized assessment of a person's abilities in a particular context. It undermines the fact-finding role of the trial judge and sends a message that women labelled with intellectual disabilities should face additional barriers in the criminal justice system. It is contrary to Canada's international human rights obligations which require Canada to ensure that judgments are not based upon harmful stereotypes and generalizations, and do not create barriers to justice for women with disabilities. Left to stand, the majority's decision will have negative repercussions for access to justice and the integrity of the justice system.

5. LEAF-DAWN-ARCH submit that the law regarding sufficiency of reasons in sexual assault cases must respect access to justice and substantive equality, two core concepts upon which our justice system rests. The majority's requirement for a more onerous assessment of reliability impedes equal access to justice for women labelled with intellectual disabilities. Access to justice is fundamental to the rule of law. This is particularly important in cases involving complainants labelled with intellectual disabilities who are subject to disproportionately high rates of sexual assault.[3] Women labelled with intellectual disabilities are deprived of the rule of law when the criminal law process operates without regard to their substantive equality rights.

6. In contrast to the majority's approach, Pepall, J.A.'s dissenting judgment demonstrates a practical application of this Court's jurisprudence on sufficiency of reasons. This Court has repeatedly held that reasons must be assessed in their entire context, including the evidentiary record, the submissions of counsel and the live issues at trial to determine whether the basis for

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[3] Women with disabilities are overrepresented among sexual assault survivors. See: Adam Cotter & Laura Savage, "Gender-based violence and unwanted sexual behaviour in Canada, 2018: Initial findings from the Survey of Safety in Public and Private Spaces" (2019) 85-002-X Juristat, accessed 22 March 2020 at 9; In 2014, women with a disability living in Canada were nearly twice as likely to have been sexually assaulted than women without a disability. See: Adam Cotter, "Violent victimization of women with disabilities, 2014" (2018) 85-002-X Juristat, accessed 22 March 2020 at 6.

the verdict is revealed.[4] By examining the complainant's own evidence, rather than focusing on general medical evidence about the complainant's disability, the dissenting judgment applies the sufficiency of reasons test in a manner that aligns with substantive equality.

B. Statement of Facts

7. LEAF-DAWN-ARCH adopt the facts as set out in the Appellant's factum. Where additional facts are required, we make reference to them in the course of argument.

PART II – QUESTION IN ISSUE

8. The question in issue is whether the majority of the Court of Appeal erred in finding that the trial judge's reasons were insufficient on the basis that the reasons fail to address adequately J.M.'s reliability and suggestibility; used J.M.'s evidence to corroborate itself; and failed to explain why the trial judge rejected the Respondent's evidence. The intervention of LEAF-DAWN-ARCH addresses only the reliability issue.

PART III – STATEMENT OF ARGUMENT

9. First, LEAF-DAWN-ARCH submit that substantive equality requires that judges make findings based on an individual's actual capacities in a particular context, and not generalizations or stereotypes. Second, LEAF-DAWN-ARCH will address how that majority of the Court of Appeal departed from this Court's jurisprudence regarding sufficiency of reasons and will contrast the majority's approach with the dissent. Next, LEAF-DAWN-ARCH will examine how the majority's approach departs from substantive equality by requiring a more onerous assessment of the complainant's reliability. This, in turn, reinforces negative stereotypes about the reliability of accounts of sexual assault by women labelled with intellectual disabilities. LEAF-DAWN-ARCH will then examine the negative repercussions for the substantive equality of the complainant and others like her and their ability to access justice. Last, LEAF-DAWN-ARCH will explore how the dissenting judgment is consistent with substantive equality.

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[4] *R v REM*, 2008 SCC 51 at para 55.

A. Substantive Equality Requires Conclusions Based on Actual Capacities and Individual Circumstances, not Generalizations about Disability

10. Substantive equality is one of the core concepts upon which our justice system rests.[5] It is the animating norm of section 15 of the *Canadian Charter of Rights and Freedoms (the Charter)*[6], and is closely tied to the concept of human dignity.[7] Substantive equality eschews conclusions based on generalizations and stereotypes about a particular group of people because of a particular aspect of their identity. Instead, it posits an approach that requires a careful, individualized assessment based on the person's unique abilities and circumstances.

11. This Honourable Court has repeatedly recognized the multitude of ways in which disability impacts individuals, commenting on the "virtually infinite variety" and "widely divergent needs, characteristics and circumstances" of persons with disabilities.[8] Consequently, this Court has emphasized that, in the context of disability, a substantive equality analysis requires an appreciation of the person's actual capacities and individual circumstances.[9] Indeed, "[d]ue sensitivity to these differences is *the key* to achieving substantive equality for persons with disabilities" (emphasis added).[10]

12. In *Quebec v A*, this Court explained that substantive inequality can occur as a result of stereotyping, a disadvantaging attitude that attributes characteristics to members of a group regardless of their actual capacities.[11] Historically, persons with disabilities have been excluded from society and subjected to pernicious stereotyping.[12] Counteracting harmful stereotyping is critical to address the historical and present-day discrimination experienced by women with disabilities.

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[5] *R v Barton*, 2019 SCC 33 at para 202.
[6] *Withler v. Canada (Attorney General)*, [2011] 1 SCR 396 at para 2; *Canadian Charter of Rights and Freedoms*, Part 1 of the I, 1982, being Schedule B to the *Canada Act* 1982 (UK), 1982, c 11.
[7] *Quebec (Attorney General) v A*, 2013 SCC 5, [2013] 1 SCR 61 at para 138.
[8] *Nova Scotia (Worker's Compensation Board) v Martin; Nova Scotia (Worker's Compensation Board) v Laseur*, 2003 SCC 54, [2003] 2 SCR 504 at para 81; *Granovsky v Canada (Minister of Employment and Immigration)*, 2000 SCC 28, [2000] 1 SCR 703 at paras 26-27.
[9] *Nova Scotia*, ibid. at para 81; *Granovsky*, ibid. at paras 27-29.
[10] *Nova Scotia*, ibid. at para 81.
[11] *Quebec (Attorney General) v A*, *supra* note 7 at para 326.
[12] *Eldridge v British Columbia (Attorney General)*, [1997] 3 SCR 624 at para 56.

13. Women with disabilities experience intersectional inequality on the basis of disability, sex, gender, and other immutable characteristics. The importance of drawing conclusions based on the actual capacities and individual circumstances of women with disabilities, as opposed to generalizations about their disabilities, cannot be overstated. Substantive equality demands the former and rejects the latter.

B. Court of Appeal Majority Decision Departs from Substantive Equality

(i) Decision Departs from Well-Established Law on Sufficiency of Reasons

14. The decision of the majority of the Court of Appeal departs from this Court's well-established jurisprudence regarding the sufficiency of reasons. This case law and its evolution is set out carefully in Pepall J.A.'s dissenting judgment.[13] The consideration of sufficiency of reasons is grounded in deference to the trial judge on findings of fact. It does not require the trial judge to address every argument. Nor is the trial judge expected to achieve a standard of perfection.[14] This Court has explained that the core question on appellate review is "[d]o the reasons, read in context, show why the judge decided as he did on the counts relating to the complainant?"[15] Reliability is a factual finding within the province of the trial judge.[16]

15. The majority faults the trial judge for failing to address reliability directly even though the majority identifies aspects of the trial decision that allude to reliability, finding that the treatment of reliability was minimal in relation to credibility.[17] Despite the majority's finding that the trial judge failed to adequately address J.M.'s reliability, the evidentiary record demonstrated that J.M.'s evidence was *not* tainted by suggestibility. While appellate courts are cautioned against reweighing the evidence, they are obliged to consider the evidentiary record when asking whether the reasons reveal the basis for the verdict reached.[18] At trial, J.M. clarified

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[13] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, pp. 71-78 at paras 107-116.
[14] *R v REM*, *supra* note 4 at paras 54-56.
[15] *R v Vuradin*, 2013 SCC 38 at para 15.
[16] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 79 para 118; *R v REM*, *supra* note 4 at para 56.
[17] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, pp. 58, 61 at paras 64-65, 71.
[18] *R v REM*, *supra* note 4 at para 55.

and corrected statements put to her by Crown counsel, defence counsel and the trial judge.[19] Indeed, the majority found that J.M. was not particularly suggestible when she was questioned by counsel and the trial judge, and that it was plausible that the level of detail in J.M.'s evidence made it unlikely that the allegations were suggested to her.[20]

16. The majority's observation that J.M. appeared to "hold her own" at trial is consistent with the expert evidence that J.M. was generally more suggestible than persons without intellectual disabilities, but that suggestibility was context specific, and would decrease for emotive, personal events such as sexual assault.[21] Despite this, the majority characterized the expert's evidence as being "… that J.M. was highly suggestible."[22] In essence, the majority preferred the medical expert's general opinion over the trial judge's individualized assessment of the complainant's evidence and over the balance of the evidentiary record.[23] Preferring generalizations over individualized assessment is contrary to substantive equality.

(ii) Decision Requires Trial Judges to Conduct More Onerous Reliability Assessment when Complainant is a Woman Labelled with Intellectual Disabilities

17. In preferring the medical expert's general opinion over the trial judge's individualized assessment of the complainant's evidence, the majority imposes an additional requirement on the trial judge to address J.M.'s suggestibility directly. By taking this approach, the majority decision would seemingly require trial judges to address the propensity for suggestibility of a complainant with an intellectual disability in future cases. Accordingly, this would be necessary even if there is no demonstrable evidence of a complainant adopting suggestions made to her in her reporting events or at trial. By implication, the majority decision requires trial judges to conduct a more onerous reliability assessment where the complainant is labelled with an intellectual disability.

18. LEAF-DAWN-ARCH submit that this more onerous reliability assessment for complainants labelled with intellectual disabilities is contrary to substantive equality. Requiring

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[19] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 87 at para 137.
[20] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 60 at para 69.
[21] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 60, 80-81 at paras 69, 121.
[22] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 41 at para 6.
[23] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 61 at para 71.

trial judges to expressly address general expert evidence about a complainant's suggestibility despite the trial judge's findings relating to indicia of reliability departs from a substantive equality approach. As explained above, substantive equality for women with disabilities requires a focus on their actual capacities in particular circumstances. Substantive equality rejects conclusions based on generalizations about disability. Contrary to substantive equality, relying on general evidence about disability risks leading to conclusions that give rise to generalizations and stereotyping.

(iii) Decision Reinforces Harmful Stereotypes and Impedes Equal Access to Justice for Women Labelled with Intellectual Disabilities

19. The Court of Appeal majority decision reinforces harmful and persistent stereotypes about women labelled with intellectual disabilities. These ableist stereotypes include assumptions that all women labelled with intellectual disabilities are child-like and prone to people-pleasing, acquiescence and suggestibility. In the context of sexual assault proceedings, these stereotypes serve to silence the voices of women labelled with intellectual disabilities by undermining the reliability and value of their evidence. Doing so places them at risk of further violence.

20. The majority accepts and prefers expert evidence about J.M.'s general suggestibility without equal consideration of whether this general characteristic actually manifested in the circumstances of this case, and despite the trial judge's findings concerning J.M.'s actual ability to perceive, recall and recount the sexual assault allegations. This reasoning sends a troubling message to complainants labelled with intellectual disabilities that courts will question their reliability on the basis of their disabilities regardless of their testimony at trial.

21. When courts accept generalizations about women labelled with intellectual disabilities, women must overcome those generalizations in order to be found to be reliable witnesses. This creates an additional barrier to their participation in the criminal trial process. It impacts the way that courts assess their evidence even if their testimony is not demonstrably less reliable. Consequently, these women may be more reluctant to report sexual assault, for fear that their testimony will be considered unreliable because of their disabilities; or they may decide not to report because they do not want medical and psychological information about their disabilities to become public. A more onerous standard for assessing reliability may make it more difficult for

the prosecution to prove its case. In this way, the Court of Appeal's majority decision reinforces harmful stereotypes that silence women labelled with intellectual disabilities in the criminal justice system and impede their equal access to justice.

22. Having ratified the *Convention on the Elimination of all Forms of Discrimination against Women* (*CEDAW*)[24] and the *Convention on the Rights of Persons with Disabilities* (*CRPD*)[25], Canada has international obligations to ensure that judgments are not based upon harmful stereotypes and generalizations, and do not create barriers to justice for women labelled with intellectual disabilities. The *CEDAW* prohibits discrimination on the basis of sex, and the UN CEDAW Committee has recognized that the right to access justice is essential to the realization of all rights protected under the CEDAW.[26] The UN CRPD Committee has identified that women with disabilities may face barriers when reporting violence, owing to stereotyping based on the intersection of gender and disability.[27] The *CRPD* requires Canada to take all available measures to protect persons with disabilities from violence and abuse, including their gender-based aspects and to ensure effective and equal access to justice for persons with disabilities.[28]

23. Taken together, the *CEDAW* and the *CRPD* recognize the intersectional discrimination faced by women with disabilities in criminal justice systems, and establish rights for women with disabilities to be free from violence and discrimination, and to enjoy equal access to justice. This Court has long recognized that the values and principles enshrined in international instruments to which Canada is a party are "relevant and persuasive" for the purpose of interpreting and applying domestic law.[29] LEAF-DAWN-ARCH submit that in the context of sexual assault

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[24] *Convention on the Elimination of All Forms of Discrimination Against Women*, 1 March 1980, 1249 UNTS 13, Can TS 1982 No 31 (Entered into force 03 September 1981, ratified by Canada 10 December 1981).
[25] *Convention on the Rights of Persons with Disabilities*, 30 March 2007, 2515 UNTS 3 at 70, Can TS 2010 No 8 (entered into force 3 May 2008, ratified by Canada 11 March 2010) *[CRPD]*.
[26] United Nations Committee on the Elimination of Discrimination against Women, *General recommendation on women's access to justice, Recommendation No 33*, CEDAW/C/GC/33 (2015) at para 1.
[27] United Nations Committee on the Rights of Persons with Disabilities, 25 November 2016, *General Comment No. 3 on women and girls with disabilities* (2016) at para 17(e).
[28] *CRPD*, *supra* note 25 at arts 16, 13.
[29] *R v Sharpe*, [2001] 1 SCR 45 at para 175; *R v Hape*, [2007] 2 SCR 292 at paras 53-56; *Divito v Canada (Public Safety and Emergency Preparedness)*, [2013] 3 SCR 157 at paras 22-28; *B010 v Canada (Citizenship and Immigration)*, [2015] 3 SCR 704 at paras 47-49.

cases, the assessment of the sufficiency of reasons must be applied in a manner that promotes equality and equal access to justice, in conformity with Canadian law on substantive equality and Canada's *CRPD* and *CEDAW* obligations.

C. Court of Appeal Dissenting Judgment Respects Substantive Equality

24. In contrast to the majority's approach, Pepall, J.A.'s dissenting judgment applies the sufficiency of reasons test in a manner that aligns with substantive equality. Pepall, J.A. grounds her dissent in an assessment of the complainant's testimony and the trial record. She rejects the defence's argument that the complainant's suggestibility was a live issue at trial. Rather, she analyzes whether the complainant's own *viva voce* evidence and the particular factual record actually supported this argument, finding that, "…the suggestibility argument lacked a factual foundation to anchor the expert's generalized opinion".[30] Since there was no evidence that the complainant actually was suggestible in this particular case, Pepall, J.A. finds that the trial judge was not required to expressly address the reliability argument, as long as it was clear that he was alive to the issue.[31] Unlike the majority's focus on general expert evidence about the complainant's disability, Pepall, J.A. focuses on examining the complainant's own evidence in the context of the record. This approach is consistent with substantive equality.

D. Conclusion

25. LEAF-DAWN-ARCH submit that in sexual assault cases, the law regarding sufficiency of reasons must be applied in a manner that does not undermine core concepts upon which our justice system rests: substantive equality and equal access to justice. This is particularly important in cases involving women labelled with intellectual disabilities who are subject to disproportionately high rates of sexual assault. One generalization ought not to detract from the whole of the evidentiary record and the reasons in their entire context.

26. While there was no objection to the expert's evidence in this case, it stands as a reminder that trial judges should be mindful of their gatekeeping function and cautious of evidence that could supplant their role of assessing a complainant's reliability. Trial judges and appellate courts must be wary of preferring expert evidence that is of a general nature, or that attributes a

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[30] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, p. 88 at para 141
[31] Judgment of the Court of Appeal for Ontario, Appellant's Record, Vol. I, pp. 81, 88 at paras 123-124, 141

general characteristic to an individual complainant labelled with an intellectual disability, over the actual capacities of the individual complainant as demonstrated by her ability to perceive, recall and recount the events and other markers of reliability. Where the defence relies upon generalized evidence about the impact of a complainant's disability on her suggestibility, or upon a diagnostic analysis or an intellectual disability label, trial judges and appellate courts must be alive to the harmful stereotypes that such arguments reinforce, and the barriers to access to justice that result.

27. LEAF-DAWN-ARCH submit that the majority's sufficiency of reasons analysis does not accord with substantive equality and equal access to justice. It creates an additional barrier for complainants with intellectual disabilities. The majority decision will impede equal access to justice and the integrity of the justice system because it undermines the fact-finding of the trial judge who focused on the actual capacities of the complainant.

PART IV– SUBMISSIONS ON COSTS

28. LEAF-DAWN-ARCH do not seek costs and ask that costs not be ordered against them.

PART V – ORDER REQUESTED

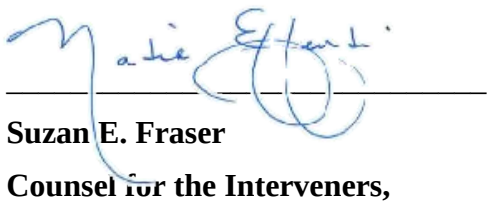
29. LEAF-DAWN-ARCH respectfully request that this appeal be determined in accordance with the above submissions.

PART VI – SUBMISSIONS ON PUBLICATION

30. N/A

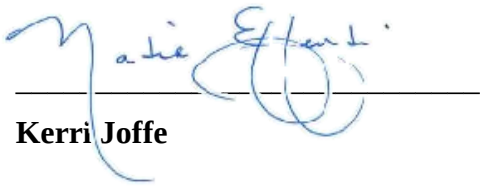
ALL OF WHICH IS RESPECTFULLY SUBMITTED this 27th day of July, 2020.

Per:



Suzan E. Fraser

Per:



Kerri Joffe

Counsel for the Interveners,
Women's Legal Education and Action Fund (LEAF),
DisAbled Women's Network Canada (DAWN) and
ARCH Disability Law Centre (ARCH)

PART VI – TABLE OF AUTHORITIES

Caselaw:

No.	Authority	Paragraph Reference
1.	*B010 v Canada (Citizenship and Immigration)*, [2015] 3 SCR 704	23
2.	*Divito v Canada (Public Safety and Emergency Preparedness)*, [2013] 3 SCR 157	23
3.	*Eldridge v British Columbia (Attorney General)*, [1997] 3 SCR 624	12
4.	*Granovsky v Canada (Minister of Employment and Immigration)*, 2000 SCC 28, [2000] 1 SCR 703	11
5.	*Nova Scotia (Worker's Compensation Board) v Martin; Nova Scotia (Worker's Compensation Board) v Laseur*, 2003 SCC 54, [2003] 2 SCR 504	11
6.	*Quebec (Attorney General) v A*, 2013 SCC 5, [2013] 1 SCR 61	10, 12
7.	*R v Barton*, 2019 SCC 33	10
8.	R *v DAI*, 2012 SCC 5	1
9.	*R v Goldfinch*, 2019 SCC 38	1
10.	*R v Hape*, [2007] 2 SCR 292	23
11.	*R v REM*, 2008 SCC 51	6, 14, 15
12.	*R v Sharpe*, [2001] 1 SCR 45	23
13.	*R v Vuradin*, 2013 SCC 38	14
14.	*Withler v. Canada (Attorney General)*, [2011] 1 SCR 396	10

Secondary Sources:

No.	Secondary Source	Paragraph Reference
1.	Adam Cotter & Laura Savage, "Gender-based violence and unwanted sexual behaviour in Canada, 2018: Initial findings from the Survey of Safety in Public and Private Spaces" (2019) 85-002-X Juristat, accessed 22 March 2020 at 9	5
2.	Adam Cotter, "Violent victimization of women with disabilities, 2014" (2018) 85-002-X Juristat, accessed 22 March 2020 at 6	5
3.	Carol A. Aylward, "Intersectionality: Crossing the Theoretical and Praxis Divide" (2010) 1:1 Journal of Critical Race Inquiry 1	2
4.	United Nations Committee on the Elimination of Discrimination against Women, *General recommendation on women's access to justice, Recommendation No 33*, CEDAW/C/GC/33 (2015) at para 1	22
5.	United Nations Committee on the Rights of Persons with Disabilities, 25 November 2016, *General Comment No. 3 on women and girls with disabilities* (2016) at para 17(e).	22

Statutes, Regulations, Rules, etc.:

No.	Statutes, Regulations, Rules, etc.:	Section, Rule, etc.
1.	*Canadian Charter of Rights and Freedoms*, Part 1 of the I, 1982, being Schedule B to the *Canada Act* 1982 (UK), 1982, c 11	Generally
	Loi constitutionnelle de 1982, Annexe B de la Loi de 1982 *sur le Canada* (R-U), 1982, c 11	Généalement

International Instruments:

No.	International Instrument	Section, Rule, etc.
1.	*Convention on the Elimination of All Forms of Discrimination Against Women*, 1 March 1980, 1249 UNTS 13, Can TS 1982 No 31 (Entered into force 03 September 1981, ratified by Canada 10 December 1981)	22
2.	*Convention on the Rights of Persons with Disabilities*, 30 March 2007, 2515 UNTS 3 at 70, Can TS 2010 No 8 (entered into force 3 May 2008, ratified by Canada 11 March 2010) *[CRPD]*	22

PART VII – STATUTES, LEGISLATION, RULES, ETC.

See part VI above