

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

BETWEEN:

ATTORNEY GENERAL OF QUÉBEC

Appellant |
Respondent on Cross Appeal
(Appellant)

– and –

JOSEPH-CHRISTOPHER LUAMBA

Respondent |
Appellant on Cross-Appeal
(Respondent)

– and –

CANADIAN CIVIL LIBERTIES ASSOCIATION

Respondent
(Respondent)

– and –

ATTORNEY GENERAL OF CANADA and
CANADIAN ASSOCIATION OF BLACK LAWYERS

Respondents
(mis en cause)

– and –

BRITISH COLUMBIA CIVIL LIBERTIES ASSOCIATION, SAINT-MICHEL
LEGAL CLINIC and HUMAN RIGHTS AND YOUTH RIGHTS COMMISSION

Interveners
(Interveners)

Style of Cause Continued on Next Page

**FACTUM OF THE INTERVENER,
WOMEN'S LEGAL EDUCATION AND ACTION FUND [LEAF]**

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

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PART I – OVERVIEW AND STATEMENT OF FACTS

A. Overview

1. This appeal concerns the constitutionality of s. 636 of Quebec’s *Highway Safety Code*,¹ which authorizes traffic stops without grounds. The question is whether giving this discretionary power to police violates sections 7, 9 and 15(1) of the *Canadian Charter of Rights and Freedoms* (the “*Charter*”) by reinforcing and enabling systemic anti-Black racism through racial profiling by police.

2. LEAF’s argument is grounded in the view that this case should be *principally analyzed* through section 15(1) – a provision whose potential to address systemic anti-Black racism remains unrealized by this Court.

3. The Women’s Legal Education and Action Fund (“LEAF”) makes three submissions: (1) section 15(1) *Charter* analysis should be grounded in substantive equality and intersectionality; (2) the section 15(1) *Charter* test should remain flexible and contextual to capture systemic and adverse-effects discrimination; and (3) section 15(1) *Charter* equality principles should guide the interpretation of other rights, ensuring that liberty and security rights are understood through the lived realities of those disproportionately affected by police powers.

4. Although sections 7 and 9 of the *Charter* are at issue in this case, LEAF will focus on the application of section 15 principles on section 9 of the *Charter*.

B. Summary of Facts and Social Context Evidence

5. LEAF takes no position on the facts and instead highlights key social context and adverse-effects evidence that is relevant to the s. 15(1) analysis.

6. In addition to Mr. Luamba — a 22-year-old² Black man of Haitian descent who was stopped on approximately fourteen occasions³ — the court heard from several witnesses describing racially

¹ *Highway Safety Code*, [RLRQ, c. C-24.2](#) (C.s.r.).

² All referenced ages are as of the date of *Luamba v. Attorney General of Quebec*, [2022 QCCS 3866](#) [*Luamba* QCCS].

³ *Luamba* (QCCS), at paras. [168-180](#).

motivated traffic stops:

- a. Police stopped Mr. Ducas, a 54-year-old Black man, often while he was driving a luxury car. After repeated stops, he decided to refuse to present his identification, asked for the reason for the stop, and called 911 for help. Police officers presented him with a stark choice: present your papers or face arrest. Mr. Ducas refused. Police publicly handcuffed and searched him outside of his car and engaged in ridicule throughout the interaction. Mr. Ducas later received two tickets for obstructing and insulting a police officer;⁴
- b. Mr. Ducas' wife, Dr. Karine Chevette, who is white, also testified. She described the significant mental impact of the stop on her husband and on their three children, who have since learned about the risks of driving while Black and have grown to dislike the city where they were raised. Dr. Chevette testified that she frequently drives her husband's vehicle but has never been stopped by police in this way;⁵
- c. Police stopped Ms. Amanda Maxwell, 39, a Black woman driving with her husband and three children. Although she was the driver, officers questioned her husband. She told her children to film the event and now fears letting her 18-year-old son drive alone;⁶
- d. Police stopped Mr. Joël DeBellefeuille, a 47-year-old Black man, while driving with younger white female family members on several occasions. In discussing this testimony, the Court noted that expert literature cites instances where a Black driver is accompanied by a young white woman, or where police justify a stop by referring to a report of a stolen car of the same make and color, as common factors associated with racial profiling.⁷ Mr. DeBellefeuille also believed that he was targeted because his skin colour did not match his white-sounding name; and,⁸
- e. Numerous witnesses described similar stops, over multiple interactions with police. One witness considered trading in his luxury car, as a prophylactic against police suspicion.⁹

⁴ *Luamba (QCCS)*, at paras. [181-209](#).

⁵ *Luamba (QCCS)*, at paras. [210-215](#).

⁶ *Luamba (QCCS)*, at paras. [271-274](#).

⁷ *Luamba (QCCS)*, at para. [282](#).

⁸ *Luamba (QCCS)*, at para. [292](#).

⁹ *Luamba (QCCS)*, at para. [256](#).

7. This record shows adverse effects discrimination where facially neutral and entirely discretionary police powers result in disproportionate impact on Black drivers and their families. Furthermore, factors like gender, age, economic means (for example, having the means to drive a luxury vehicle), having a white-sounding name, or having white family members present at the stop did not insulate these Black witnesses from racial profiling by police. Rather, their presumed Blackness, in concert with stereotypes about illegitimate wealth, family, or belonging, heightened their risk of stops, ridicule, and punishment. These encounters directly harmed Black women, children, and families and created distrust of the police, including amongst their non-Black relatives.

8. After reviewing extensive expert and social fact evidence, including key reports by the Ontario Human Rights Commission,¹⁰ Tulloch J.A.'s (as he then was) *Report of the Independent Review of Street Checks*, and the studies summarized in *R. v. Le*,¹¹ the Superior Court summarized the main findings that are applicable to the s. 15 analysis as follows:¹²

- a. The impugned law authorizes police officers to stop drivers without reason or suspicion of an offence. This absolute discretion is not governed by any directive, policy or rule of law;
- b. The qualitative, quantitative, expert and doctrinal evidence corroborate each other on the effects of the contested rule of law on Black people and on those around them. The result is a higher proportion of Black drivers are stopped compared to white drivers and this statistical result is not explained by anything other than racial profiling;
- c. Racial profiling is a pernicious phenomenon that associates a person's presumed racial identity with a propensity for criminality and interferes with police judgment when selecting a vehicle for a traffic stop without grounds;
- d. Despite educational and training efforts made in recent years, there is no evidence that these initiatives have reduced the targeting of Black communities by police; and

¹⁰ Ontario Human Rights Commission, *A Disparate Impact: Second Interim Report on the Inquiry into Racial Profiling and Discrimination Against Black People in the Toronto Police Service* ([Toronto: OHRC, August 2020](#)); *A Collective Impact: Interim Report on the Inquiry into Racial Profiling and Discrimination Against Black People in the Toronto Police Service* ([Toronto: OHRC, November 2018](#)).

¹¹ *R. v. Le*, [2019 SCC 34](#), [2019] 2 SCR 692, at paras. [89-97](#).

¹² *Luamba (QCCS)*, at para [822](#).

- e. Because racial profiling is rarely proved directly the courts have agreed on the need for contextual inferences of racial profiling and have identified similar indicators of racial profiling in police stops.¹³

9. The disproportionate number of traffic stops of Black drivers, and the imposition of arbitrary detention have a significant impact on Black communities, negatively impacting self-esteem, perceptions of equality and confidence in the police and the justice system - not only of those stopped but also including their families, regardless of race.¹⁴

10. In defence of the law, the Attorney General of Québec argues that section 636 is neutral and that racial profiling arises only from the individual misconduct of officers.¹⁵ LEAF rejects this “few bad apples” theory of discrimination. Racial profiling is a foreseeable outcome of a legal regime granting police unguided discretion in the context of acknowledged systemic anti-Black racism.

PART II – STATEMENT OF ISSUE

11. It is in this context that LEAF advances its arguments on section 15: (1) the analysis should be based on substantive equality and intersectionality; (2) the test should remain flexible and contextual to capture systemic and adverse-effects discrimination; and (3) substantive equality principles should inform the interpretation of other *Charter* rights.

PART III – STATEMENT OF ARGUMENT

A. Section 15 Analysis Should Be Informed by an Intersectional Substantive Equality Framework

i. Substantive Equality is the Animating Norm of Section 15

12. Section 15 is the *Charter* right that is best suited to addressing systemic discrimination in the context of facially neutral law. Despite section 15’s express guarantee of equality regardless of race, colour, or ethnic origin, its promise has been largely unfulfilled for Black Canadians. In over forty years of *Charter* jurisprudence, the Supreme Court has never directly confronted anti-Black

¹³ *Luamba (QCCS)*, at para [42](#).

¹⁴ *Luamba (QCCS)*, at para [822](#).

¹⁵ Factum of the Appellant, Attorney General of Québec (“AGQ Factum”), paras 86–89, 92–93, 97–98.

racism under section 15.¹⁶

13. As Sonia Lawrence notes, Canadian equality doctrine has too often “eclipsed race” by treating adverse-effects discrimination as exceptional rather than central to s. 15.¹⁷ However, from the first equality case, this Court has endorsed a substantive equality approach as the “animating norm” of section 15 of the *Charter*, attentive to real-world disadvantage.¹⁸

14. Recent cases, including *Fraser*, *Alliance*, and *Sharma*, reaffirm that adverse-effects discrimination lies at the heart of substantive equality and that the s. 15 framework should be applied flexibly to reflect how systemic inequality operates in practice.¹⁹

15. In its most recent section 15 cases, this Court described the two-part inquiry as follows: (1) whether the law imposes differential treatment based on protected grounds, explicitly or through adverse impact; and (2) whether the law reinforces, perpetuates, or exacerbates disadvantage.²⁰

16. To fulfill s. 15’s promise, the Court should maintain a substantive, intersectional approach and reject the Attorney General’s claim that facially neutral laws cannot discriminate. Substantive equality requires confronting the structural conditions that make racial profiling foreseeable, ensuring that the *Charter* is a remedy for systemic inequality, not a shield for unchecked discretion.

17. Substantive equality requires courts to look beyond facial neutrality to the actual impact of laws and policies. It recognizes that the same law may result in different and disproportionate effects for different groups, even while purporting to apply to everyone equally. Here, despite a facially neutral law, police officers do not treat all drivers the same. The analysis should always turn on the real-

¹⁶ Sealy-Harrington, “*The Charter of Whites: Systemic Racism and Critical Race Equality in Canada*” (2023) 39 *Windsor Y.B. Access Just.* 544 at 550–53.

¹⁷ Lawrence, Sonia., ‘The Admittedly Unattainable Ideal’: Adverse Impact and Race under s. 15” in Special Lectures 2017: Canada at 150 – The Charter and the Constitution ([Toronto: Irwin Law, 2017](#)) at 547–48.

¹⁸ *Andrews v. Law Society of British Columbia*, [1989] 1 S.C.R. 143 [*Andrews*] at 165–69.

¹⁹ *Fraser v. Canada (Attorney General)*, 2020 SCC 28 [*Fraser*] at paras 42, and 53–71; *Quebec (AG) v Alliance du personnel professionnel et technique de la santé et des services sociaux* 2018 SCC 17 [*Alliance*] at para 41; *Sharma v R.* 2022 SCC 39 [*Sharma*] at paras 37, 49, 204–206.

²⁰ *Fraser*, at paras 42, 71; *Sharma*, at paras 37, 42.

world impact of the impugned law, taking full account of the group's social, political, economic, and historical circumstances.²¹

i. An Intersectional Approach Imbues Substantive Equality With Practical Meaning

18. This Court's equality jurisprudence should address systemic and intersectional disadvantage, rather than confining equality to discrete categories.²² Ignoring intersectionality frustrates s. 15's purpose. An intersectional lens imbues substantive equality with practical meaning. In racial profiling cases, it requires courts to examine how multiple, overlapping systems of oppression shape how discretionary police powers are experienced in practice.²³ Equality analysis should capture these cumulative discriminatory effects.²⁴

19. In this appeal, that means acknowledging the intersectional impacts of s. 636 stops. The expert and witness evidence demonstrate that both *race and gender* coincide with police discretion and result in profiling by police. Although young Black men between the ages of 25-34 face the highest risk of police stops without reason,²⁵ Black people are 5.58 times more likely to be stopped for identification purposes regardless of their gender and location at the time of the stop.²⁶ These discretionary police powers also impose direct, distinct and compounding harms on Black women, Black children, and Black families.²⁷

²¹ *Fraser* at paras. 42–46; *Withler v Canada (Attorney General)*, [2011 SCC 12](#) [*Withler*] at para 39; *Andrews* at 165–69.

²² *Fraser*, paras. 42, 71; *Alliance* at para. 41; *Eldridge v British Columbia (Attorney General)* [1997] 3 S.C.R. at para. 55.

²³ *Fraser*, at para. 42.

²⁴ *Sharma* at para. 37; Sealy-Harrington, “The Charter of Whites: Systemic Racism and Critical Race Equality in Canada” (2023) 39:1 Windsor Y.B. Access Just. 544.

²⁵ *Luamba (QCCS)*, at para 400 citing [August 2019](#) research from Professors Victor Armony, Mariam Hassaoui, and Massimiliano Mulone – a report entitled “*Police Stops in Light of the Racialized Identities of the Persons Stopped.*”, at page 89 of report.

²⁶ *Luamba QCCS* at para 401, citing the same report, at page 96 of report.

²⁷ *Luamba QCCS* at para 401 at paras, 271-274. For Black women, youth, and gender-diverse persons, racial profiling compounds gendered and class-based stereotypes, being perceived as suspicious or defiant, facing disproportionate enforcement, and enduring intergenerational trauma (*Quebec (AG) v. A*, [2013 SCC 5](#) [*A (2013)*] at para. 327).

B. The Section 15(1) Test Should Remain Flexible to Capture Systemic Harms

20. In adverse-effects cases, courts should resist treating the two stages of the section 15(1) test as watertight compartments. The same evidence (such as lived experience, social science, and historical context) is relevant to both parts of the test. Acknowledging this overlap is necessary to a substantive equality approach to section 15(1).²⁸

21. Adverse-effects discrimination only be fully appreciated through a broad, contextual analysis.²⁹ At the first stage, disproportionate impact is assessed by examining how the impugned law interacts with the claimant group’s characteristics and pre-existing barriers. At the second stage, that same evidence reveals how the impact compounds systemic inequality.³⁰ Conducting a complete contextual inquiry is in and of itself a significant evidentiary burden and it is essential that this evidence is fully utilized at both stages of the test.

22. On the issue of causation, LEAF submits that a strict causation requirement would, as Karakatsanis J. warned, “re-entrench pre-*Charter* formalism”.³¹ As *Fraser* emphasized, courts should consider both “the full context of the claimant group’s situation” and “the outcomes that the impugned law or policy has produced in practice”.³² Failing to anticipate racial bias in designing discretionary powers may itself establish causation.³³

23. Substantive equality should not demand statistical precision – especially in the face of institutional resistance to collecting appropriate and necessary data – only a persuasive connection between the legislative structure and the discriminatory effect.³⁴ This is because systemic discrimination arises through cumulative effects, institutional discretion, and social context. Here, Québec’s data confirms that Black drivers are stopped at disproportionately high rates; evidence that directly links the operation of section 636 to its adverse racial impact.

²⁸ *Fraser*, para. 55; *Sharma* para. 37; *Withler* at para. 37.

²⁹ *Withler* at paras. 2, 37, 39; *Fraser* at paras 42; *Alliance* at para. 27.

³⁰ *Fraser* at paras 55-59; *Withler* at para 37.

³¹ *Sharma* at paras. 204-206.

³² *Fraser* at para 54.

³³ *R. v. Kokopenace*, 2015 SCC 28, [2015] 2 SCR 398 at paras. 255 and 257; *Fraser* at para 71; *Sharma* at para 29.

³⁴ *Fraser* at paras 55-59.

24. The Attorney General argues that any disproportionate impact stems from individual misconduct, not from statutory discretion, and warns that recognizing systemic discrimination would hinder a police officer's ability to effect the rule of law.³⁵ As this Court has confirmed since *Andrews*, section 15 turns on the law's effects, not its neutrality or intent.³⁶ Concerns about administrative impact belong under section 1 of the *Charter*, where governments may justify limits on equality.³⁷

25. The Appellant's position reflects a broader "floodgates" concern that recognizing systemic racial profiling under section 15 would open the door to limitless claims or impede legitimate policing. That concern is misplaced. *Fraser* and *Withler* confirm that section 15 targets systemic and adverse-effects discrimination through a contextual and evidence-based inquiry. Such claims should be proven through concrete, persuasive evidence. Far from opening the floodgates, this framework ensures that section 15 remains responsive to inequality while maintaining evidentiary and analytical discipline.³⁸

C. Equality should guide the interpretation of Section 9

26. The section 15 equality right is "the broadest of all guarantees. It applies to and supports other rights guaranteed by the *Charter*."³⁹ *Charter* rights should be interpreted harmoniously and purposively, reflecting their interdependence and mutual reinforcement.⁴⁰ As *Eldridge* and *Vriend* affirm, governments should design and administer all laws and programs consistent with the principle of equality.⁴¹ Equality should therefore be the *primary lens* through which cases such as *Luamba* are analyzed, both under the section 15 test itself and when assessing other *Charter* rights

³⁵ AGQ Factum, paras 86–89.

³⁶ *Andrews* at 164–65.

³⁷ Lawrence, Sonia., 'The Admittedly Unattainable Ideal': Adverse Impact and Race under s. 15" in *Special Lectures 2017: Canada at 150 – The Charter and the Constitution* (Toronto: Irwin Law, 2017) at 550–51.

³⁸ *Fraser* at paras 42–56; *Withler* at para 37; *Luamba* (QCCS), at paras 591–597.

³⁹ *New Brunswick (Minister of Health and Community Services) v. G.(J.)*, [1999] 3 SCR 46 at para. 112 [G.(J.)]; See also *Andrews* at para 185.

⁴⁰ *Law Society of British Columbia v Trinity Western University*, 2018 SCC 32 at para 41.

⁴¹ *Eldridge* at paras 69–71, 83; *Vriend v Alberta* 1998 1 SCR 493 at paras 60–61.

at issue, in this case both sections 7 and 9.⁴²

27. Under section 9, the analytical framework requires the Court to determine: (1) was the individual detained or imprisoned? and (2) was that detention or imprisonment arbitrary?⁴³ The section 15 equality analysis is directly relevant to the first part of the section 9 test where the Court is asked to determine whether an individual was detained.

28. In *Le*, the Court held that the detention question should be assessed from the perspective of the individual involved in the police interaction.⁴⁴ Although *Le* was not a section 15 case, this Court extensively surveyed recent reports and concluded that “we have arrived at a place where the research now shows disproportionate policing of racialized and low-income communities.”⁴⁵

29. The detention question necessarily relies on a substantive equality analysis. The Court should make this connection explicit by indicating that the same social context analysis that is relevant to both stages of the section 15 test should also be applied in answering the detention question under section 9. To be clear, LEAF’s argument is not a direct response to the Appellant’s section 9 arguments because the Appellant maintains that the contemporary evidence on racial profiling does not alter the Court’s assessment of the interests at stake.”⁴⁶

30. In addition to being a constitutional obligation, ensuring a concordant analysis between *Charter* rights has numerous advantages, principally consistency and efficiency. Consistency ensures that the analysis of other *Charter* rights does not lead to outcomes that are antithetical to or frustrate the equality guarantee. It also ensures that the significant evidentiary burden placed on litigants is efficiently utilized.

D. Concluding Remarks: Discretionary Powers and Systemic Effects

31. The Québec Court of Appeal recognized that racial profiling rarely stems from explicit bias

⁴² *R. v. Boudreault*, [2018 SCC 58](#) [*Boudreault*] see paras. [65-79](#) per Justice Martin, who provided a substantive quality approach to analyzing harms under [section 12](#) of the *Charter*. See also *R. v. Mills*, [\[1999\] 3 SCR 668](#), and *R. v. Golden*, [\[2001\] 3 SCR 679](#).

⁴³ *R. v. Hufsky*, [\[1988\] 1 S.C.R. 621](#) at paras. 12-13.

⁴⁴ *Le*, at [para 75](#).

⁴⁵ *Le*, at [para 97](#).

⁴⁶ Brief of the Appellant at para 89.

alone but from unguided discretion within a racially stratified context.⁴⁷ As *Fraser* confirms, section 15(1) is breached when a law “fails to consider the systemic disadvantage” with which it interacts.⁴⁸ The *Luamba* record confirms that discretionary stop powers are exercised in a manner that disproportionately targets Black drivers; these are foreseeable impacts.⁴⁹

32. When the state authorizes unfettered police discretion amidst known anti-Black racism, it creates and contributes to racialized harms.⁵⁰ The trial judge’s findings reinforce this point. Expert evidence established that training or goodwill cannot cure discretionary bias; even when officers recognize disparities, they deny their own racial profiling and view it as an individual moral failing rather than a systemic problem.⁵¹ In other words, without safeguards, discretion becomes a structural vector of discrimination. The result is the impugned law undermines the *Charter’s* substantive equality guarantee and cements systemic racism by creating fear, humiliation, and eroding societal trust in institutions.

PART IV – SUMISSIONS ON COSTS

33. The Intervener seeks no costs and asks that no costs be awarded against it.

PART V – ORDER

34. The Intervener takes no position with respect to the outcome of this appeal.

PART VI – SUBMISSIONS ON PUBLICATION

N/A

⁴⁷ *Luamba (QCCS)*, at paras. [67–70](#).

⁴⁸ *Fraser*, at para [71](#).

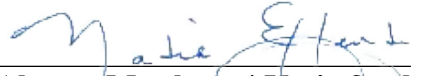
⁴⁹ This Court has recognized analogous reasoning in *Ewert v. Canada (AG)*, [2018 SCC 30](#). (see *Luamba (QCCS)*, at paras [161–577](#); *Luamba (QCCA)*, at paras [222–25](#)).

⁵⁰ *R. v. Le*, [2019 SCC 34](#), [2019] 2 SCR 692, at paras. [89-97](#).

⁵¹ *Luamba (QCCS)*, at para [424](#).

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 5th day of November 2025.

Per:


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Women's Legal Education and Action Fund
[LEAF]

PART VII – TABLE OF AUTHORITIES

Caselaw

No.	Caselaw	Paragraph Reference
1.	<i>Andrews v. Law Society of British Columbia</i> , [1989] 1 S.C.R. 143	13, 17, 24, 26
2.	<i>Attorney General of Quebec v. Luamba</i> , 2024 QCCA 1387	31
3.	<i>Attorney General of Quebec Luamba v. Attorney General of Quebec</i> , 2022 QCCS 3866	6, 8, 9, 10, 26, 31
4.	<i>Eldridge v British Columbia (Attorney General)</i> [1997] 3 S.C.R.	18, 21, 26
5.	<i>Ewert v. Canada (AG)</i> , 2018 SCC 30	31
6.	<i>Fraser v. Canada (Attorney General)</i> , 2020 SCC 28	14, 15, 17, 18, 20, 21, 22, 23, 25, 26, 31
7.	<i>Law Society of British Columbia v Trinity Western University</i> , 2018 SCC 32	30
8.	<i>New Brunswick (Minister of Health and Community Services) v. G.(J.)</i> , [1999] 3 SCR 46	26
9.	<i>Quebec (AG) v Alliance du personnel professionnel et technique de la santé et des services sociaux</i> 2018 SCC 17	14, 21, 25
10.	<i>Quebec (AG) v. A</i> , 2013 SCC 5	22
11.	<i>R. v. Le</i> , 2019 SCC 34 , [2019] 2 SCR 692	8, 28, 29, 32
12.	<i>R. v. Kokopenace</i> , 2015 SCC 28 , [2015] 2 SCR 398	22
13.	<i>R. v. Boudreault</i> , 2018 SCC 58	26
14.	<i>R. v. Mills</i> , [1999] 3 SCR 668	26
15.	<i>R. v. Golden</i> , [2001] 3 SCR 679	26
16.	<i>R. v. Hufsky</i> , [1988] 1 S.C.R. 621	27
17.	<i>Sharma v R.</i> 2022 SCC 39	14, 15, 18, 20, 22

No.	Caselaw	Paragraph Reference
18.	<i>Vriend v Alberta</i> 1998 1 SCR 493	26
19.	<i>Withler v Canada (Attorney General)</i> , 2011 SCC 12	17, 18, 20, 21, 25

Secondary Sources

No.	Secondary Source	Paragraph Reference
1.	Factum of the Appellant, Attorney General of Québec (“AGQ Factum”)	10, 24, 29
2.	Lawrence, Sonia., ‘The Admittedly Unattainable Ideal’: Adverse Impact and Race under s. 15” in Special Lectures 2017: Canada at 150 – The Charter and the Constitution (Toronto: Irwin Law, 2017)	13, 24
3.	Ontario Human Rights Commission, <i>A Disparate Impact: Second Interim Report on the Inquiry into Racial Profiling and Discrimination Against Black People in the Toronto Police Service</i> (Toronto: OHRC, August 2020)	8, 10
4.	Ontario Human Rights Commission, <i>A Collective Impact: Interim Report on the Inquiry into Racial Profiling and Discrimination Against Black People in the Toronto Police Service</i> (Toronto: OHRC, November 2018)	8, 10
5.	Sealy-Harrington, Joshua. <i>The Charter of Whites: Systemic Racism and Critical Race Equality in Canada</i> (2023) 39:1 Windsor Y.B. Access Just. 544	16, 18

Statutes, Regulations, Rules, etc.

No.	Statute, Regulation, Rule, etc.	Section, Rule, Etc.
1.	<i>Highway Safety Code</i> , CQLR, c. C-24.2	s. 1
	<i>Code de la sécurité routière</i> , RLRQ c C-24.2	s. 1
2.	<i>The Constitution Act, 1982</i> , Schedule B to the Canada Act 1982 (UK), 1982, c 11	s. 1 to s. 4 s. 7 s. 9 s. 11 to s. 16
	<i>Loi constitutionnelle de 1982</i> , Annexe B de la Loi de 1982 sur le Canada (R-U), 1982, c 11	s. 1 to s. 4 s. 7 s. 9 s. 11 to s. 16