Canadian Human Rights Tribunal

Tribunal canadien des droits de la personne

Citation: 2022 CHRT 38
Date: November 24, 2022
File No.: T2642/1821

Between:

Lorraine Vadnais

Complainant

- and -

Canadian Human Rights Commission

Commission

- and -

Leq'á:mel First Nation

Respondent

Ruling

Member: Gabriel Gaudreault

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I. Overview

[1] This is a ruling from the Canadian Human Rights Tribunal ("Tribunal") deciding the motion brought by the Respondent, Leq'á:mel First Nation, seeking permission to file amendments to its amended Statement of Particulars. On October 17, 2022, the hearing in this matter began. The Commission and the Complainant, Ms. Vadnais, presented their case, filed their exhibits, called their witnesses, and closed their evidence.

[2] On October 22, 2022, it was time for the Respondent to open its case and present its evidence. However, in the middle of the hearing, the Respondent sought authorization to amend its amended Statement of Particulars and, more particularly, to add four different amendments that can be summarized as follows:

a. The Respondent wants to clarify that the Tribunal should take a contextual approach in adjudicating this matter and should take into account, as a special consideration, the fact that it is a First Nation.

b. The Respondent wants to add a defence of undue hardship under s. 15(1)(g) and 15(2) of the *Canadian Human Rights Act*, RSC 1985 c H-6 ("CHRA").

c. The Respondent wants to address the Complainant's allegations regarding the breach of fiduciary duties.

d. The Respondent wants to address the Complainant's allegations that it did not abide by its Land Code.

[3] The Respondent filed its proposed amendments which helped the other parties and the Tribunal to understand the nature of the additions that it is seeking.

II. Decision

[4] For the following reasons, the Tribunal partially grants the Respondent's request regarding the contextual factors, dismisses the request to add a defence under s. 15 of the *CHRA*, and grants the request regarding the issues of the fiduciary duties and the Land Code.

III. Issue

[5] Should the Tribunal authorize the Respondent to amend its amended Statement of Particulars in the midst of the hearing and after the Commission and the Complainant have closed their case?

IV. Reasons

[6] The Tribunal is partially authorizing the Respondent to file amendments at this stage of the proceedings. While the principles of flexibility and celerity are cornerstones that guide the Tribunal in the way that it must deal with its inquiries (s. 48.9(1) of the *CHRA*), it must also consider the requirements of natural justice and its Rules of Procedure.

[7] The Tribunal adopted the *Canadian Human Rights Tribunal Rules of Procedure, 2021*, SOR/2021-137 ("*Rules of Procedure*") which guide the parties regarding what they are required and expected to do, to accomplish, and consequences if they fail to comply with such rules.

[8] The rules set expectations, guide the parties regarding each step of the proceedings including filing Statements of Particulars. The Statements of Particulars include all the facts and the issues of law that a party intends to rely on. For the Complainant and the Commission, they also include the remedies that are sought. As for the Respondent, it is its chance to respond to the allegations raised by the other parties and to present its defence(s) (Rules 18 to 21 of the *Rules of Procedure*).

[9] There is a reason why Statement of Particulars are filed at the very beginning of the process before the Tribunal: they are the very foundation of the proceedings, the procedural vehicle that forms the basis of the claim (*Karas v. Canadian Blood Services and Health Canada*, 2021 CHRT 2 at para 21).

[10] The Statements of Particulars set out the terms of the inquiry (*Gaucher v. Canadian Armed Forces*, 2005 CHRT 1 at para 11 [*Gaucher*]; *AA v. Canadian Armed Forces*, 2019 CHRT 33 at para 58 [*AA*]).

[11] Complaints are open to refinement as new facts and new circumstances may emerge during the Commission's investigation process. Therefore, the allegations of discrimination raised at the Commission's stage may then be clarified, refined and elaborated in the Statements of Particulars filed before the Tribunal (*Gaucher* at para 11; *AA* at para 59). When the complaint is referred to the Tribunal for an inquiry, the parties have time to think about their case, the allegations, the facts, the law, the remedies, and the defences that they want to put forward. They have time to build their theory of their case and present it in their Statement of Particulars.

[12] In the general course of our quasi-judicial process, refinements, clarifications, and elaborations are done at the beginning of the proceedings or at an early stage and amendments are made throughout the case management process. Then, when the Tribunal and the parties get to the hearing, they know exactly what the real issues in controversy are, the evidence that will be tendered, the identity of the witnesses and a general idea of their anticipated testimony. The Tribunal and the parties know where they are going; the Statements of Particulars are roadmaps.

[13] In our circumstances, the Respondent is seeking permission to amend its amended Statement of Particulars in the midst of the hearing and after the Commission and Ms. Vadnais have closed their case. It is uncommon to request formal amendments to pleadings during the hearing.

[14] As the Respondent pleaded, the Tribunal indeed has a broad discretion regarding amendment requests. As with pleadings or statements of claim, Statements of Particulars can be amended at any stage of the proceeding – even during the hearing or trial – to determine the real issues in controversy between the parties. While this is true, the Tribunal must also ensure that such requests must not result in an injustice to the other parties and that granting such requests would serve the interests of justice (*Canderel Ltd. v. Canada*, 1993 CanLII 2990 (FCA), [1994] 1 FC 3 [*Canderel*]; C*anada (Human Rights Commission) v. Canadian Telephone Employees Assn.*, 2002 FCT 776 (CanLII) at para 31; *Polhill v. Keeseekoowenin First Nation*, 2017 CHRT 34 at para 15).

[15] In *Whyte v. Canadian National Railway*, 2009 CHRT 33, the Tribunal wrote that the party seeking permission to amend its Statement of Particulars:

> […] will have to show how their request is not prejudicial to the other parties and to the Tribunal's process. It will also have to demonstrate that there was some valid justification for this late request.

[16] The Tribunal believes that at this stage, authorizing some of the amendments – the addition of an undue hardship defence and some elements of the contextual factors – is not in the interest of justice. These amendments are prejudicial to the other parties and the Respondent has not provided any valid justification for such a late request.

[17] Moreover, other amendments sought by the Respondent would not have necessarily required an amendment to its amended Statement of Particulars. They could have been easily addressed during the hearing in response to the evidence tendered by the Commission and Ms. Vadnais or even in final arguments. As the Respondent has already provided more particulars regarding these elements (some of the elements regarding the contextual factors, the fiduciary duties and the Land Code) the Tribunal authorizes these amendments at this time.

Undue hardship s. 15(1) and s. 15(2) of the CHRA

[18] The Respondent is not asking to make minor modifications to its amended Statement of Particulars. It asks the Tribunal to significantly amend the very nature of the theory of its case to include a defence of undue hardship under s. 15(1) and 15(2) of the *CHRA*. It asks the Tribunal to add a new defence that was not anticipated. In other words, this is a surprise.

[19] The Respondent argues that new evidence came to light during the hearing and informed counsel for the Respondent of the potential availability of a defence. It also argues that the contextual approach that the Tribunal should adopt supports its undue hardship defence. The Tribunal is not convinced by these arguments.

[20] If the Respondent believes that it has an undue hardship defence under the *CHRA* because of its unique status as a First Nation and the challenges that it must face, it is hard to believe that such explanations would only come to light during the hearing and after the

Respondent had an opportunity to hear the whole evidence presented by the Commission and the Complainant and now that they have closed their cases.

[21] If the Respondent believes that there were financial and/or human resources strains, challenges, or barriers that it faced as a First Nation and that could explain or justify the alleged denial of the residential accommodation or the differentiation in the provision of the residential accommodation, these reasons would have existed at the relevant period of Ms. Vadnais's complaint. The Tribunal is not convinced by the Respondent's argument that this only came to light during the hearing and still does not understand how the Respondent could have overlooked all of this and is now discovering in the middle of the hearing that it was going through financial and human resources strains at the time of the complaint.

[22] According to the Commission, the Respondent did not participate in its investigation process but did receive all the Commission's correspondence which includes information regarding the defences that it may raise.

[23] Moreover, this complaint was referred by the Commission to the Tribunal on February 26, 2021. The hearing began on October 17, 2022, about a year and 8 months after the referral. The Complainant and the Commission filed their Statements of Particulars on May 21, 2021, the Respondent filed theirs on June 28, 2021, and the pleadings were amended during the summer of 2022. The Respondent could have easily requested to add a defence at that time and the Tribunal would have assessed its request in due course. But it did not do so.

[24] In addition to the time that it had during the Commission's investigation process, the Respondent had 20 months to assess its case and it never raised a defence under s. 15(1) and (2) of the *CHRA*. It has decided to solely refute the allegations of the *prima facie* case of discrimination, which is its choice. Many respondents that are appearing before the Tribunal also take that position.

[25] That being said, the Respondent had sufficient time to determine if indeed, during the relevant period of this complaint, it was going through financial and human resources strains. If it was facing hardships in administering the income assistance program for persons with disabilities, all these reasons were already existing when the Respondent filed

its Statement of Particulars. This information was always within its control, and it could easily have included these elements in its pleadings if it had chosen to do so.

[26] Moreover, the Respondent is not a self-represented litigant and is represented by counsel. Counsel knows – or ought to know – the law. The analysis of a *prima facie* case of discrimination and the defences that are available to respondents under s. 15(1) and 15(2) of the *CHRA* are nothing new. The Tribunal's case law on these matters is well established and there is no surprise in that regard. It is hard to believe that the Respondent finally learned in the middle of the hearing that it might have a defence of undue hardship when these hardships would have existed at the time of the complaint.

[27] The Respondent also argues that allowing it to raise such defence will not cause any procedural inefficiencies in the Tribunal's proceedings and would not be prejudicial to the Commission and to the Complainant. It also argues that the Commission has not presented any authority for its assertion that defences must be pleaded before the hearing. The Tribunal is not convinced by the Respondent's arguments.

[28] Allowing such amendments at this late stage of the proceedings gives an advantage to the Respondent who had the opportunity to hear the full evidence of Ms. Vadnais and the Commission. As stated by the Federal Court of Appeal in *Canderel*: "There is a clear difference between allowing amendments to clarify the issues in dispute and those that permit a distinct defence to be raised for the first time". Indeed, granting amendment requests before the hearing begins is quite different from granting such requests in the middle or at the end of it, where it could give another chance for a party who had the benefit of hearing evidence to shape – or reshape – its case in retrospect.

[29] On that point, all parties to a case have the right to know the position of the other parties and what they will present as evidence at the hearing. That is the whole purpose of filing Statements of Particulars with sufficient details, so the parties know well enough and in advance the allegations, the questions of law, the remedies, and the defences that are at issue and that they have a full and ample opportunity to respond to these elements (s. 50(1) of the *CHRA* and Rules 18 to 21 of the *Rules of Procedure*).

[30] The Tribunal is puzzled by the Respondent's argument that the Commission has not presented any authority that supports the fact that a defence must be pleaded before the hearing. No authority is required to support such contention: it is part of the core principles found in the *CHRA* (s. 48.9(1) and 50(1) of the *CHRA*), the *Rules of Procedure* (Rule 5 of the *Rules of Procedure*) and it is the very foundation of the requirements of natural justice and the principle of fairness including, among others, the right to know what the case is about, the other parties' positions and arguments, and the right to fully respond and present evidence.

[31] All parties have a right to know what the other parties' assertions are and defend themselves. And if a party is not raising elements in its Statement of Particulars, it cannot rely on them unless the Tribunal authorizes it to do so (Rule 37 of the *Rules of Procedure*). This is exactly what the Respondent did; it did not raise a s. 15 defence and it had the latitude and sufficient time to do so.

[32] The continuation of the hearing is scheduled for November 28, 2022 and authorizing such modifications at this stage will inevitably cause additional delays. If the Tribunal authorizes such additions, it will have to give a chance to Ms. Vadnais and the Commission to prepare themselves, to give them time to respond to this new defence and amend their pleadings and it opens the door for requests for additional disclosure of documents. Of course, the Respondent will also have the obligation to provide all the arguably relevant documents related to that new defence. In the current case, those arguably relevant documents would include disclosure of a significant number of financial documents which would take time for the other parties to review and may require expert evidence to interpret for the Tribunal.

[33] The Tribunal reiterates that the cases of Ms. Vadnais and the Commission are now closed. The Tribunal will have to give them a chance to assess the necessity of reopening their case so they can present evidence to rebut the Respondent's new assertions. It means the possibility of filing additional documentary evidence at the hearing, calling new witnesses or even recalling witnesses that have already testified if need be.

[34] The Respondent argues that the evidence that was led or could have been led by the Complainant or the witnesses that were already called could not have spoken to its defence of undue hardship and, therefore, raising a new defence would not unduly affect the proceedings. Again, the Tribunal is not convinced by this argument.

[35] While presenting their evidence, neither the Commission nor the Complainant – nor the Tribunal – anticipated that the Respondent would subsequently raise a new defence under s. 15 of the *CHRA*. The Tribunal is the master of its proceedings, but the parties are the masters of their evidence. It is the parties' role to ensure that they present all the evidence that they need to support their allegations and their claims. But they are also shaping their evidence and their theory of the case in prediction and in response to the other parties' position. They assess the necessity of filing documentary evidence or calling witnesses to support their allegations but also refute the other parties' position and arguments. This includes the choice of calling witnesses that are tied to or related to an opposing party.

[36] Therefore, it is easy to say, after the fact, that the Commission and the Complainant's evidence did not, or could not speak to a defence that they were not aware of beforehand; there was no way for Ms. Vadnais and the Commission to properly prepare in that regard. By filing this request at a late stage and by taking Ms. Vadnais and the Commission by surprise, the Respondent has prevented them from assessing the defence and deciding how they want to manage their evidence on this issue.

[37] That being said, the Tribunal is also concerned when the Commission raised in its submissions the potential necessity of expert evidence regarding some aspects of the Respondent's request. Ms. Vadnais has clearly indicated that she wants her hearing to continue, and she doesn't want any more delays in her proceedings. She mentions that the proceedings and the delays continue to affect her emotionally and physically. The Tribunal understands that she is ready for closure and this is also a factor to consider.

[38] Authorizing these additions will clearly prolong the hearing and this isn't in the interest of justice. The Respondent had all the time required to present its defence fully and amply and to prepare its case in advance. It decided not to present a defence under s. 15(1) and

15(2) of the *CHRA*. Now, the Respondent seeks to correct the situation by asking permission to amend its pleadings after having heard the full evidence of the Commission and the Complainant. In doing so, it takes everyone by surprise. At this stage, such a request is unfair and prejudicial. There is no valid justification for such a late request.

[39] Therefore, the amendments to paragraphs 72 to 78 of the Respondent's proposed amended Statement of Particulars are not authorized.

Contextual approach

[40] The Respondent wishes to clarify its position regarding the circumstances that it raised in paragraphs 1 through 6 of its amended Statement of Particulars and during its opening statement made at the hearing. It also wants to address the line of evidence led by the Commission and Ms. Vadnais regarding the adverse inferences that they are inviting the Tribunal to make regarding the challenges to the production of evidence, discrepancies in email communication and its staff behaviours.

[41] It believes that when assessing the evidence as a whole, the Tribunal should consider its unique status as a First Nation, a government, an administration and in our circumstances also a landlord. The Respondent invites the Tribunal to take a contextual approach and to consider the specific challenges that a First Nation is facing and to be afforded with special considerations before it.

[42] The Commission doesn't oppose to the inclusion of paragraphs 58 to 60, 61(a), (c), (f) to (h) and 63. It argues that for the other paragraphs, some of them relate to an undue hardship defence or might require expert evidence. The Tribunal agrees with the Commission that some of the amendments of the Respondent seem to be tied to a defence under s. 15 of the *CHRA*, which is confirmed by the latter in its Reply submissions when it says that the contextual factors and the s. 15 defence are intertwined.

[43] The Tribunal is not authorizing the Respondent to include an undue hardship defence at this late stage of the proceedings and therefore, for the same reasons, the Tribunal will not authorize it to amend its amended Statement of Particulars regarding the contextual factors that speak to or support an undue hardship defence. However, the Tribunal is clear

that the fact that these amendments are not being permitted does not mean than any question the parties might ask that in some way touches on these issues is objectionable. The Tribunal and the Parties must keep in mind that we want to be efficient and proportionate (s. 48.9(1) of the *CHRA*) and that the Tribunal will not consider the evidence to determine the existence of an undue hardship defence under s. 15 of the *CHRA*.

[44] That being said, the contextual factors might be relevant when the Tribunal is assessing the *prima facie* case of discrimination and other elements that the Commission and Ms. Vadnais have raised in their evidence and during the hearing. They notably raised concerns regarding different actions of the Respondent. For example, they have raised the fact that Ms. Vadnais was barred from the band office because of her alleged behaviours and could not access the premises to pay her rent and that she was not receiving responses to her emails from the Respondent's staff. They have raised, among others, concerns regarding staff behaviours, discrepancies in some of the Respondent's correspondence and in the production of documents.

[45] Also, the Respondent's main rebuttal is that there is no *prima facie* case of discrimination and that the Complainant and the Commission have not established a connection between Ms. Vadnais' race and/or disability and the adverse impact she suffered in the provision of residential accommodation. The Respondent is therefore attempting to demonstrate that what happened has nothing to do with a prohibited ground of discrimination; it argues that the nexus is absent.

[46] This is where the contextual factors might also be relevant. The Respondent raised at paragraph 6 of its amended Statement of Particulars that the COVID-19 pandemic has strained its already limited financial and human resources. The Tribunal is clear that based on the Respondent's amended Statement of Particulars and its position since the beginning of this case, it has never mentioned that its limited resources were an undue hardship defence.

[47] This allegation is tied to the rebuttal of the Ms. Vadnais's *prima facie* case of discrimination. The Respondent is trying to demonstrate that there are other reasons as to why it acted the way that it did. In this regard, the Tribunal is ready to give the Respondent

some leeway and the Commission and the Complainant will have a chance to cross-examine the Respondent's witnesses on this matter, present rebuttal evidence and address these issues in their closing submissions if need be.

[48] Moreover, it seems that most of the Respondent's amendments, for example paragraphs 58, 59, 60, 61(c), (f), (g), (h), are already the subject of judicial notice and do not depart from the Tribunal's case law and, more importantly, from the lessons learned from higher courts such as Supreme Court of Canada. It seems that these amendments are essentially arguments that the Respondent could have made in its closing submissions. As for paragraph 63, this amendment doesn't seem controversial. The Tribunal will authorize such additions at this time.

[49] As for paragraph 61(d), (e) and 64, the Tribunal will also authorize these amendments, but it is very clear: this doesn't open the door for the Respondent to raise an undue hardship defence. There is a distinction between amending pleadings to clarify issues and amending pleadings that permit the addition of a distinct defence that was not anticipated (see *Canderel*) and the Tribunal is not authorizing the addition of a totally new defence at this stage of the proceedings.

[50] The Respondent's limited financial and human resources is an allegation included in its amended Statement of Particulars at paragraph 6, and the Tribunal will assess this allegation in regard to Ms. Vadnais's *prima facie case* of discrimination and not under s. 15 of the *CHRA*.

[51] The Parties must also bear in mind that the prohibited ground of discrimination does not have to be the sole factor in the adverse impact experienced by a complainant (*Quebec* (*Commission des droits de la personne et des droits de la jeunesse) v. Bombardier Inc. (Bombardier Aerospace Training Center)*, [2015] SCR 789). There may exist other reasons why a respondent acted the way it did which could include budget cuts, restructuring, or other types of strains or challenges.

[52] Albeit, the prohibited ground of discrimination only needs to be <u>one of the factors</u> in the occurrence of the adverse impact. The Tribunal's decision in *Hugie v. T-Lane Transportation and Logistics*, 2021 CHRT 27 (CanLII) is a great example of this situation

where the respondent did not plead a s. 15 defence and focussed its evidence on the rebuttal of the complainant's *prima facie* case of discrimination. It alleged among other things that it has terminated the complainant because of financial difficulties. The Tribunal decided that the company was going through a difficult time and was facing financial challenges at the time of the complainant's termination, but the complainant's disability was also a factor in its decision to terminate her.

[53] The Tribunal believes that the Respondent's amendments that are allowed are essentially contextual and mostly amount to legal argument. As such, there is no need for the Complainant and Commission to be provided an opportunity to amend their Reply Statements of Particulars. However, they may cross-examined the witnesses if they speak to these points and may respond to these arguments during their final submissions.

[54] For the reasons above, the Tribunal does not allow the addition of paragraphs 61(a), 61(b), 62 and 65. The Tribunal allows the addition of paragraphs 61(d), 61(e) and 64 but is clear that it will not be assessed as a defence under s.15 of the *CHRA*. The Tribunal allows the additions of paragraphs 58, 59, 60, 61(c), 61(f), 61(g), 61(h) which are essentially contextual and mostly amount to legal arguments. The Tribunal allows the addition of paragraph 63 which is not, to its view, controversial.

Breach of Fiduciary duties and Land Code

[55] As for the allegations of a breach of fiduciary duties and regarding the Land Code, the Respondent wants to address in writing, in its amended Statement of Particulars, the evidence that was put forward by Ms. Vadnais mostly during her examination.

[56] In her Statement of Particulars, Ms. Vadnais briefly referred to a fiduciary relationship between her and the Respondent as the latter was responsible in administering her shelter allowances that she was entitled to receive under the income assistance program for persons with disability and, at the same time, was her landlord.

[57] She also briefly referred to the Respondent's Land Code regarding some of its actions – refusing to produce requested documents and by hindering her right to access the

dispute resolution and appeal processes – and the fact that it should be found guilty of an offence under that code.

[58] At this time, it is not necessary for the Tribunal to get into all the details, but it acknowledges that Ms. Vadnais testified regarding the alleged breach of the Respondent's fiduciary duties and the alleged violation of the Respondent's Land Code. To the best of the Tribunal's recollection, Ms. Vadnais's testimony on these subjects was entered into evidence and the Tribunal did not prevent her from testifying on these matters; nobody objected, and no objection was sustained in that regard.

[59] Even if Ms. Vadnais went slightly off topic and testified on a few aspects that were not included in her Statement of Particulars or Reply, her testimony was properly entered in evidence and the Respondent had a chance to cross-examine her in that regard. Now that the door has been opened and that Ms. Vadnais spoke to these matters, the Respondent necessarily has a chance to present evidence in that regard.

[60] That being said, the Tribunal wants to point out that not every additional issue that is raised during the inquiry will require amendments and inclusion in the parties' pleadings. This is exactly a situation where amendments were not required.

[61] The Respondent could have easily and expeditiously addressed these issues at the hearing now that Ms. Vadnais spoke to them and opened the door. The Respondent could have asked a few questions to its witnesses on these points and the other parties would have had the chance to cross-examine them and file rebuttal evidence if need be. The Respondent could even have addressed these elements in its closing submissions, notably regarding relevancy or weight that the Tribunal should afford to such evidence.

[62] However, the Commission doesn't oppose these additions and Ms. Vadnais mostly took a position on the undue hardship defence and the fact that she wants to avoid additional delays in the proceedings. Therefore, the Tribunal will authorize these additions – at paragraphs 79 to 81 and paragraphs 82 to 93 of the Respondent's proposed amended Statement of Particulars – noting that these elements could have been addressed at the hearing without the need for amendments.

[63] The Tribunal believes that at this time, there is no need to provide the Complainant and Commission an opportunity to amend their Reply Statements of Particulars as the amendments were not strictly necessary and this evidence could have been elicited through cross-examination and argued in closing submissions without an amendment from the Respondent.

[64] The Tribunal reminds the parties that its role is to determine of the existence of discrimination under the *CHRA*. Its role is not to decide compliance with or offences under a land code, nor is it to decide if there is a breach of any kind of fiduciary relationship, duties or obligations that might exist between the parties. It is not obvious to the Tribunal at this stage that the Land Code and any potential fiduciary duty are relevant to the core allegations in this matter.

[65] That being said, now that the Respondent provided more clarifications on these elements, this is still helpful for Ms. Vadnais, the Commission and the Tribunal to understand the Respondent's position in that regard and the Tribunal believes that it can be dealt with in a very efficient way in the examination and cross-examination of witnesses and during closing submissions.

V. Will say statements

[66] The Respondent is required to provide updated will-say statements of its witnesses forthwith, bearing in mind the limits imposed in this ruling.

VI. Order

[67] The Respondent's proposed amendments are allowed to the following paragraphs: 58 to 60, 61(c), (d), (e), (f) (g) and (h), 63 and 64, 79 to 81 and finally, 82 to 93.

[68] The Respondent's proposed amendments to the following paragraphs are not allowed: 61(a) and (b), 62, 65 and 72 to 78.

[69] The Respondent is required to provide updated will-say statements of its witnesses forthwith.

[70] The Complainant and the Commission are not authorized to amend their Reply Statements of Particulars in response to the Respondents amendments but they will have an opportunity to cross-examine witnesses that will speak to these additions and to address these elements in their closing submissions.

Signed by

Gabriel Gaudreault
Tribunal Member

Ottawa, Ontario
November 24, 2022

Canadian Human Rights Tribunal

Parties of Record

Tribunal File: T2642/1821

Style of Cause: Lorraine Vadnais v. Leq'á:mel First Nation

Ruling of the Tribunal Dated: November 24, 2022

Motion dealt with in writing without appearance of parties

Written representations by:

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