

BC Human Rights Tribunal

1170 - 605 Robson Street

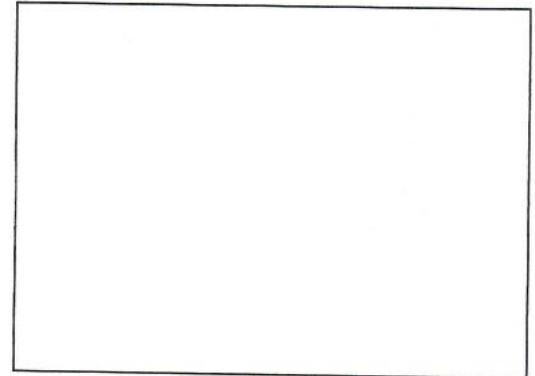
Vancouver BC V6B 5J3

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Tribunal Stamp

GENERAL INSTRUCTIONS

- For detailed instructions select the **Help** buttons as you go or click on **All Instructions** now
- See the Tribunal's website for further information – www.bchrt.bc.ca
- Your information will NOT be automatically saved by the Tribunal
- Click on **Save** at any time to save your form to your computer
- Fill in the areas for Part I and Part II
- **Email** us your form by attaching a saved copy and sending it to BCHumanRightsTribunal@gov.bc.ca
- OR click on **Print** and **fax**, **mail** or **hand deliver** a copy of your form to us
- Keep a copy of this Complaint Form and all the documents

For assistance with filing your complaint contact

BC Human Rights Clinic

Tel: 604-622-1100

Toll Free: 1-855-685-6222

www.bchrc.net

The Law Centre

Tel: 250-385-1221

www.thelawcentre.ca

YOUR INFORMATION

FIRST NAME: ** Kari		LAST NAME: ** Simpson	
NAME OF LAWYER OR OTHER PERSON WHO REPRESENTS YOU IN THIS COMPLAINT (IF APPLICABLE):			
MAILING ADDRESS: ** Suite 201 - 22314 Fraser Highway			
CITY: ** Langley		PROVINCE: ** BC	POSTAL CODE: ** V3A 8M6
<p>Purpose of collecting contact information: The Tribunal uses your contact information to process the complaint and conduct surveys to evaluate and improve its services. The Tribunal will give your mailing address to the other parties for the exchange of information and other documents. Your additional contact information will only be given to the other parties if you agree.</p> <p><input type="checkbox"/> Check here to tell the Tribunal not to disclose the additional contact information below to the Respondent.</p>			
TELEPHONE: ** 778-277-2201	FACSIMILE:	CELLULAR:	
EMAIL: cultureguard@gmail.com			

PART I: REPRESENTATION OF THE GROUP OR CLASS

NOTE: If the remedy you seek for the group or class is the same remedy you would seek in your own complaint, file only an individual complaint. For example, if the only remedy you want is for an organization to change its policy, you would file only your own individual complaint.

Describe the group or the class of persons: **

Married and/or widowed biologically heterosexual Christian females, that gender identify and express as women, and have given life to both biologically provable male and female human beings/children, who also share membership in an organization called Culture Guard, and who are members of numerous groups identified in and protected by the BC Human Rights Code and are active in their democratic responsibilities and in doing so attended a BC Human Rights Tribunal hearing conducted at the BC Human Rights Tribunal Vancouver offices and were forced, due to the BC Human Rights Tribunal bathroom signage and policy, to forfeit the shield of protection of their BC Human Rights Code protected rights as Christians, and as biological females—presenting and identifying as females—had to endure personal indignity and the humiliatingly discriminatory abuse of the Attorney General ("AG"), BCHRT Tribunal chair, and Jane or John Doe by being forced to share a "women's" bathroom with biological males. **

*This group's complaint, prior to the adoptive lunacy of Trans sex activism language by the Respondents and the legally unnecessary amendments of the BC Human Rights code to include "Gender Identity" and "Gender Expression" would have simply read:

Married and/or widowed Christian women, who are moms and/or grandmothers to both boys and girls, that belong to an organization called Culture Guard and attended a hearing at the BCHRT in Vancouver and were forced to share a "women's" bathroom with men due to the signage and policy of the Respondents that violate the rights of the group.

*Due to the attendance of the Complainant group at the Whatcott hearing it is obvious that certain members of the BCHRT struggle with comprehending concepts of male and female and the appropriate pronouns one is to use when addressing Biologically Opposed Presenting Individuals (BOPIs). As a result of the bizarre embracement of the newly undefined or seemingly redefined words like "men" and "women" the Complainant Group must use absurdly descriptive language to ensure the reader comprehends what kind of "women" is complaining.

1. Are you a member of the group or class? **

☒ Yes

☐ No

2. Why are you filing the complaint? **

It was agreed by the other group members that I would be the best one to file the complaint.

3. Do your interests in the complaint differ from the members? **

☐ Yes

☒ No

1. Describe your communications with the group or class of persons to date: **

In-depth discussions with the other group member complainants, including written authorization to commence this class action complaint on their behalf and the agreed upon form of communication for all matters relating to this complaint.

2. Do you have any reason to believe that the group or class or some of its members may not want you to file this complaint on their behalf? *

☐ Yes

☒ No

4. Describe your plan for communicating with the group or class in the future: *

Verbal discussions will be followed-up with a written recap of the conversation and emailed. Written communication will be emailed. Emails will be copied to all members.

PART II: COMPLAINT

STEP 1: NAME THE RESPONDENT(S)

Name each individual person, business or organization you believe is responsible for the discrimination.

An individual Respondent might be a co-worker, boss, building manager, landlord, restaurant server, employee at a recreation facility, health care provider or government official.

A business or organizational Respondent might be the company the group members worked for, a newspaper, a school district, a trade union, a society or a strata corporation.

State The Relationship of the Group or Class With Each Respondent

Respondent 1:

NAME: ** Attorney General for BC ("AG")			
RELATIONSHIP TO THE GROUP OR CLASS YOU REPRESENT: ** Statute bound to protect the Group's rights, educate about the BCHRC and uphold the law if contravened.			
MAILING ADDRESS: ** PO Box 9044 Stn. Pro Gov.			
CITY: ** Victoria		PROVINCE: ** BC	POSTAL CODE: ** V8W 5J3
TELEPHONE: ** 250-387-1866	FACSIMILE:	CELLULAR:	
MAILING ADDRESS: **			

Respondent 2:

NAME: ** BC Human Rights Tribunal Chair, Diana Juricevic			
RELATIONSHIP TO THE GROUP OR CLASS YOU REPRESENT: ** Responsible for the management of the BCHRT and what transpires			
MAILING ADDRESS: ** 1270 - 605 Robson Street			
CITY: ** Vancouver		PROVINCE: ** BC	POSTAL CODE: ** V6B 5J3
TELEPHONE: ** 6047752000	FACSIMILE:	CELLULAR:	
MAILING ADDRESS: **			

Respondent 3:

NAME: ** Jane or John Doe			
RELATIONSHIP TO THE GROUP OR CLASS YOU REPRESENT: ** Individual responsible for altering use of women's washroom at the BCHRT to include males.			
MAILING ADDRESS: ** 1270 - 605 Robson Street			
CITY: ** Vancouver		PROVINCE: ** BC	POSTAL CODE: ** V6B 5J3
TELEPHONE: ** 6047752000	FACSIMILE:	CELLULAR:	
MAILING ADDRESS: **			

STEP 2: AREA(S) & GROUND(S) OF DISCRIMINATION

List the area(s) and ground(s) of discrimination that apply to this complaint:

A complaint must show that the Respondent's conduct took place in an area of daily life protected under the BC Human Rights Code. These are called "**areas of discrimination**".

It must also show that the person has a personal characteristic(s) protected under the Code. These are called "**grounds of discrimination**". These protected personal characteristics may be:

- actual (for example, a person's ancestry or age), or
- perceived (for example, someone thinks that a person has or may develop a disability in the future, or makes homophobic comments regardless of the person's sexual orientation).

Not all grounds of discrimination apply to all areas of discrimination.

Respondent 1: Attorney General for BC ("AG")

Area of Discrimination

- | | | | |
|------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------|--------------------------------------|
| <input checked="" type="checkbox"/> Accommodation, service or facility | <input type="checkbox"/> Employment | <input type="checkbox"/> Employment advertisement | <input type="checkbox"/> Publication |
| <input type="checkbox"/> Purchase of property | <input type="checkbox"/> Tenancy | <input type="checkbox"/> Unions and associations | <input type="checkbox"/> Wages |

Grounds of Discrimination

- | | | | |
|-------------------------------------------------------------------|-----------------------------------------|----------------------------------------------|----------------------------------------------|
| <input type="checkbox"/> Age | <input type="checkbox"/> Ancestry | <input type="checkbox"/> Colour | <input type="checkbox"/> Family Status |
| <input checked="" type="checkbox"/> Gender Identity or Expression | <input type="checkbox"/> Marital Status | <input type="checkbox"/> Mental Disability | <input type="checkbox"/> Physical Disability |
| <input type="checkbox"/> Place of Origin | <input type="checkbox"/> Race | <input checked="" type="checkbox"/> Religion | <input checked="" type="checkbox"/> Sex |
| <input checked="" type="checkbox"/> Sexual Orientation | | | |

"Gender Identity" is a person's sense of themselves as male, female, both, in between or neither. It includes people who identify as transgender. Gender identity may be different or the same as the sex a person is assigned at birth.

"Gender Expression" is how a person presents their gender. This can include behaviour and appearance, including dress, hair, make-up, body language and voice. This can also include name and pronoun, such as he, she or they. How a person presents their gender may not necessarily reflect their gender identity.

Only biological females can identify for legal purposes and HRC protection as women.

Transgendered males are male and should identify as a Trans Male. Gender "Expression" does not

Details: override another protected groups rights. "Expression" cannot require the forfeiture of rights of others

"Religion" includes adherence to the practices of a particular faith or genuinely held religious beliefs, and not having religious beliefs.

Modesty, protection of women, privacy, public decency are matters of significance and integral to Christians, Muslims, Sikhs, and the majority of those who adhere to their religious beliefs. The

Details: Respondents failed to respect and protect our religious rights.

"Sex" includes being a man, woman, inter-sexed or transgender. It also includes pregnancy, breast-feeding and sexual harassment.

Biological reality is what makes you male or female. Stupidity, ignorance and pretending the associated dangers of BOPs, especially males, having unfettered access to female washrooms is

Details: irresponsible. The Respondents are endangering women.

"Sexual Orientation" includes being heterosexual, gay, lesbian or bisexual.

Heterosexual females deserve protection too. The Respondents have no mandate to alter the reality of what it is to be male or female. The Respondents are playing a dangerous game of pretend

Details: without legal authority to do so.

Respondent 2: BC Human Rights Tribunal Chair, Diana Juricevic

The Area(s) & Grounds are the same as Respondent 1

Area of Discrimination

- | | | | |
|------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------|--------------------------------------|
| <input checked="" type="checkbox"/> Accommodation, service or facility | <input type="checkbox"/> Employment | <input type="checkbox"/> Employment advertisement | <input type="checkbox"/> Publication |
| <input type="checkbox"/> Purchase of property | <input type="checkbox"/> Tenancy | <input type="checkbox"/> Unions and associations | <input type="checkbox"/> Wages |

Grounds of Discrimination

- | | | | |
|-------------------------------------------------------------------|-----------------------------------------|----------------------------------------------|----------------------------------------------|
| <input type="checkbox"/> Age | <input type="checkbox"/> Ancestry | <input type="checkbox"/> Colour | <input type="checkbox"/> Family Status |
| <input checked="" type="checkbox"/> Gender Identity or Expression | <input type="checkbox"/> Marital Status | <input type="checkbox"/> Mental Disability | <input type="checkbox"/> Physical Disability |
| <input type="checkbox"/> Place of Origin | <input type="checkbox"/> Race | <input checked="" type="checkbox"/> Religion | <input checked="" type="checkbox"/> Sex |
| <input checked="" type="checkbox"/> Sexual Orientation | | | |

"Gender Identity" is a person's sense of themselves as male, female, both, in between or neither. It includes people who identify as transgender. Gender identity may be different or the same as the sex a person is assigned at birth.

"Gender Expression" is how a person presents their gender. This can include behaviour and appearance, including dress, hair, make-up, body language and voice. This can also include name and pronoun, such as he, she or they. How a person presents their gender may not necessarily reflect their gender identity.

Details: Same as above

"Religion" includes adherence to the practices of a particular faith or genuinely held religious beliefs, and not having religious beliefs.

Details: Same as above

"Sex" includes being a man, woman, inter-sexed or transgender. It also includes pregnancy, breast-feeding and sexual harassment.

Details: Same as above

"Sexual Orientation" includes being heterosexual, gay, lesbian or bisexual.

Details: Same as above

Respondent 3: Jane or John Doe

The Area(s) & Grounds are the same as Respondent 1

Area of Discrimination

- | | | | |
|---------------------------------------------------------------------|----------------------------------|------------------------------------------------|-----------------------------------|
| <input checked="" type="radio"/> Accommodation, service or facility | <input type="radio"/> Employment | <input type="radio"/> Employment advertisement | <input type="radio"/> Publication |
| <input type="radio"/> Purchase of property | <input type="radio"/> Tenancy | <input type="radio"/> Unions and associations | <input type="radio"/> Wages |

Grounds of Discrimination

- | | | | |
|-------------------------------------------------------------------|-----------------------------------------|----------------------------------------------|----------------------------------------------|
| <input type="checkbox"/> Age | <input type="checkbox"/> Ancestry | <input type="checkbox"/> Colour | <input type="checkbox"/> Family Status |
| <input checked="" type="checkbox"/> Gender Identity or Expression | <input type="checkbox"/> Marital Status | <input type="checkbox"/> Mental Disability | <input type="checkbox"/> Physical Disability |
| <input type="checkbox"/> Place of Origin | <input type="checkbox"/> Race | <input checked="" type="checkbox"/> Religion | <input checked="" type="checkbox"/> Sex |
| <input checked="" type="checkbox"/> Sexual Orientation | | | |

"Gender Identity" is a person's sense of themselves as male, female, both, in between or neither. It includes people who identify as transgender. Gender identity may be different or the same as the sex a person is assigned at birth.

"Gender Expression" is how a person presents their gender. This can include behaviour and appearance, including dress, hair, make-up, body language and voice. This can also include name and pronoun, such as he, she or they. How a person presents their gender may not necessarily reflect their gender identity.

Details: Same as Respondent 1

"Religion" includes adherence to the practices of a particular faith or genuinely held religious beliefs, and not having religious beliefs.

Details: Same as Respondent 1

"Sex" includes being a man, woman, inter-sexed or transgender. It also includes pregnancy, breast-feeding and sexual harassment.

Details: Same as Respondent 1

"Sexual Orientation" includes being heterosexual, gay, lesbian or bisexual.

Details: Same as Respondent 1

STEP 3: RESPONDENTS' CONDUCT

Answer these questions to show that the Respondent's conduct could be discrimination under the *Human Rights Code*

Respondent 1: Attorney General for BC ("AG")

1. What did the Respondent do?

Date (YYYY MM DD) **	What Happened? **
2018 12 11	Please refer to the 4 attached pages

2. What is the adverse impact on the group or class you represent? **

The adverse impact reinforces the narrative that certain biological males/men, ones that wear wigs or lipstick, have an assumed privileged right to deny the protected rights of an entire class - women/females - and are aided in this by the very individuals who are statute bound to protect the rights of women/females. This has resulted in a troubling reality that demands redress.

3. How was each ground of discrimination a factor in the adverse impact? **

Humiliation, fear, invasion of privacy, the promotion of the harmful narrative that it is ok to demean women... The fact that this transpired at the BCHRT, the entity that is relied upon to protect the rights of people and groups, aggravates the harm and amplifies the hurt and humiliation.

This form of discrimination could have been completely avoided by simply creating the addition of a "Trans" bathroom if demand is at such a high level that it warrants tax-payer expenditure. Men and Women have a protected right not to be discriminated against. Those who identify contrary to their biological reality do not have the right to impose or thrust their protected right in front of the protected groups.

The conduct of the Respondents was intentional.

Respondent 2: BC Human Rights Tribunal Chair, Diana Juricevic

1. What did the Respondent do?

Date (YYYY MM DD) **	What Happened? **
	Same as Respondent 1

2. What is the adverse impact on the group or class you represent? **

Same as Respondent 1

3. How was each ground of discrimination a factor in the adverse impact? **

Same as Respondent 1

Group Complaint of:

Married and/or widowed biologically heterosexual Christian females, that gender identify and express as women, and have given life to both biologically provable male and female human beings/children, who also share membership in an organization called Culture Guard, and who are members of numerous groups identified in and protected by the BC Human Rights Code and are active in their democratic responsibilities and in doing so attended a BC Human Rights Tribunal hearing conducted at the BC Human Rights Tribunal Vancouver offices and were forced, due to the BC Human Rights Tribunal bathroom signage and policy, to forfeit the shield of protection of their BC Human Rights Code protected rights as Christians, and as biological females-presenting and identifying as females-had to endure the humiliating and discriminatory abuse of the Attorney General ("AG") and BCHRT Tribunal chair, and Jane or John Doe by being forced to share a "women's" bathroom with biological males.

V

AG of BC, BCHRT Chair Juricevic and Jane/John Doe

STEP 3: RESPONDENTS' CONDUCT

Respondent

1. What did the Respondent do?

Date (YYYY MM DD)

2018 12 11 – 2018 12 17

What Happened?

December 11, 2018 - to date, the Respondents failed to provide the group with certain lawful accommodations that are well established legal precedents involving public decency, safety, and security as a female/woman. The Respondents are duty bound to protect the group's rights, but instead deliberately infringed upon them.

The Respondents knew, or ought to have known, that by including the words “Trans People Welcome” on the sign identifying the washroom as being for “Women”, that biological males who seek to appropriate a female identity would predictably abuse this “welcome” and deliberately violate on the rights of women/females.

And of course this did happen. The stalls in the “women’s” bathroom located on the 12th floor of the facility governed by the BC Human Rights Tribunal in Vancouver are not that private. The doors are not well-fitted, and the gaps allow for measurable invasions of privacy. The bathroom is also quite small and confining.



Vancouver BCHRT bathroom sign for the only public women’s washroom on the 12th floor.

On the first day of the *Whatcott* hearing, an assistant to a member of the Complainant group was occupying one of the stalls in the women’s washroom and noted the stall next to her being occupied. Shortly thereafter, she heard a loud male voice that began talking to other people attending the hearing who had piled into the women’s washroom.

She recognized the man’s voice to be Morgane Oger. This was disturbing and distressing to her. Her security of person was violated, she remained in the stall until she was certain that the biological man, Oger, had gone for fear of being bullied.

Morgane Oger is well-known to the Complainant group members. Oger has harassed and threatened the organization to which the group members belongs. Oger has engaged in highly abusive conduct, and incited hateful attacks against the group member's organization via social media, the legacy media, and at protests.

It is well-known that the factors associated with Biologically Opposed Presenting Individuals (BOPIs), in this case biological males dressing up as, impersonating, pretending to be or desiring to be women involve numerous root causes that vary from individual to individual. These root causes can include, but are not limited to: delusion and other mental health issues like gender dysphoria; an addiction to hyper-sexualized and/or sexually kinky experiences; a vulnerability to the social contagion affects.... and more.

Regardless of the inciting cause, these individuals remain biological males. The Respondents do not have the luxury of being ignorant in these matters. The Respondents have, by their actions, endangered women and children, and have reduced their value in society to a substandard level of being willfully disregarded, degraded and dismissed.

On December 12, 2018 group member Kari Simpson sent an email to the BCHRT case manager in the *Oger v Whatcott* matter for forwarding to the presiding Tribunal members, a panel that included Respondent Juricevic. The correspondence asked for an immediate remedy to the bathroom situation. The Respondents failed to act. A copy of the email is attached.

Complainant group members encountered males accessing the women's washroom repeatedly over the course of the hearing.

Morgane Oger, a biological male, has publicly stated that he has fathered two children, and has informed a member of the group that he is in a relationship with a woman.

The Respondents are well aware of the fact that Oger is a biological male, regardless of his many false assertions, his willingness to engage in make-believe, and/or his continuing attempts to bully/force people into complying with, and participating in, his delusion.

Mr. Oger has viciously harassed the group's members and engaged in highly abusive conduct towards them and the organization that the group belongs to.

By actively inviting males into the women's washroom—especially having knowledge of males like Oger, who is a Complainant in other matters before the BCHRT, and another BCHRT Complainant Jonathon Yaniv who believes he has a right to force women to wax his genitals—the Respondents are fully aware of the danger they have placed women in.

The Respondents have abused their statutory power to facilitate a political agenda that purposely, not only discriminates against women, but endangers them.

The Respondents have demanded that the group members either embrace delusion or self-discriminate by being forced to participate with, witness and/or acquiesce to biological males in their private spaces.

The Respondents by inviting men into a women's washroom have deliberately abused their power, discriminated against and have endangered a protected group.

The BCHRT bathroom is not a safe place for the Complainant group members.

The Respondents have promoted a false belief that biological males are not only entitled to violate and trample on the rights of women, but have actually stated that they will be “welcome” to do so.



Culture Guard <cultureguard@gmail.com>

Notice to panel members Oger v. Whatcott

Culture Guard <cultureguard@gmail.com>
To: BCHRT <BCHumanrightstribunal@gov.bc.ca>
Bcc: Charles Lugosi <lugosilaw@gmail.com>

Wed, Dec 12, 2018 at 6:51 AM

Attention:

Daniel Varnals

CASE MANAGER

BC HUMAN RIGHTS TRIBUNAL

Notice to Panel Members: Oger v Whatcott

Cease disrespectful and offensive language use in addressing Complainant Oger.

I will be attending the hearing again today and trust you will be respectful of those, like me and many others in the hearing room, who do not engage in a dissociative reality and refrain from trampling on the rights of women.

Please refer to the Complainant simply as "the complainant". The use of associative feminine related language to address a biological male is at best ludicrous from a position of logic and degrading, disrespectful and humiliating to those whose gender identity and reality is female – a Charter protected, provable state of being. I find it astonishing that special rights and privilege to the exclusion of others would be on such blatant and overtly biased display by the Tribunal members.

Please adjust your conduct to be respectful of all protected groups and people. I appreciate that Complainant Oger's legal counsel will continue to abuse the English language and reality, that is ok, we have free speech but as impartial jurists your responsibilities and obligations include impartiality.

I would also bring to your attention that my assistant was shocked to be using, what should be a safe place for a woman-the bathroom, only to find a biological man in the same facility. The BCHRT is there to protect the rights of woman and should be a safe place.

Please remedy this situation immediately. Provide use of an independent bathroom for individuals who identify contrary to their biology if need be but don't trample on my rights to accommodate another's.

Thank you,

Kari Simpson
Executive Director Culture Guard

Respondent 3: Jane or John Doe

1. What did the Respondent do?

Date (YYYY MM DD) **	What Happened? **
	Same as Respondent 1

2. What is the adverse impact on the group or class you represent? **

Same as Respondent 1

3. How was each ground of discrimination a factor in the adverse impact? **

Same as Respondent 1

STEP 4: PART A – TIME LIMIT TO FILE COMPLAINT

To file the complaint on time, you must file it within one year of each Respondent's conduct (acts or omissions). If only some of the conduct happened in the last one year the complaint may be filed in time if all of that Respondent's conduct is related or similar and close enough in time.

Answer the questions in **STEP 4: Part A** to show whether the complaint is filed in time. If some or all of the complaint may be filed late, you will also complete **STEP 4: Part B**.

1. Did all the conduct you say is discrimination happen in the last one year?

☒ Yes ☐ No

STEP 5: OTHER RELATED PROCEEDINGS

The Tribunal may defer the complaint (put the complaint on hold) until another proceeding capable of dealing with the human rights complaint, such as a grievance, has been completed. If the complaint is deferred, the Tribunal will take no further steps until the deferral ends.

Is there another proceeding? **

☐ Yes ☒ No

STEP 6: REMEDIES

1. List the type of remedies you want for the group or class: **

Please refer to the attached 3 pages

2. List any other person or organization affected by these remedies:

All British Columbians

Group Complaint of:

Married and/or widowed biologically heterosexual Christian females, that gender identify and express as women, and have given life to both biologically provable male and female human beings/children, who also share membership in an organization called Culture Guard, and who are members of numerous groups identified in and protected by the BC Human Rights Code and are active in their democratic responsibilities and in doing so attended a BC Human Rights Tribunal hearing conducted at the BC Human Rights Tribunal Vancouver offices and were forced, due to the BC Human Rights Tribunal bathroom signage and policy, to forfeit the shield of protection of their BC Human Rights Code protected rights as Christians, and as biological females-presenting and identifying as females-had to endure the humiliating and discriminatory abuse of the Attorney General ("AG") and BCHRT Tribunal chair, and Jane or John Doe by being forced to share a "women's" bathroom with biological males.

V

AG of BC, BCHRT Chair Juricevic and Jane/John Doe

STEP 6: REMEDIES

1. List the type of remedies you want for the group or class:

1. Determination as to whether the BCHRT can hear this matter or refer it to a court or other administrative tribunal.
2. Apology from the Respondents to all members of the group.
3. Declaration ordering that all government and civic facilities, buildings and schools provide separate washrooms and change rooms (where needed) designated for biological females and biological males only. Biological sex neutral washrooms can only exist in addition to the washrooms/changerooms at a mutually approved ratio.

4. All washroom/change room signage inviting use by "trans" people or other like wording or symbol will be removed immediately and replaced with Women Only or Men Only like wording or symbol.
5. Amend, create and/or stipulate within all related statutes a clearly defined prohibition of males/men use of women's washroom/change room facilities or the use of a men's washroom/change room by a female/woman.
6. Clearly define "sexual harassment" to include a male using a women's washroom and a female using a male's washroom in all applicable provincial statutes and all forthcoming collective agreements.
7. The AG is to better inform and educate British Columbians that "Gender Expression", "Gender Identity" and/or "sexual orientation" does not alter biological reality, nor does it empower a male or female with the right to trample on another protected groups rights, including sex and religion.
8. Amend the *BC Human Rights Code* to define "Gender Identity" and "Gender Expression" as cosmetic, costume or outward projection of a person.
9. Amend the *BC Human Rights code* to protect children from the known harms (copycat/social contagion) associated with Gender Dysphoria, and/or other mental health issues related to a biologically opposed presenting individual (BOPI). For example, a school, library or daycare does not contravene the code if it fails to hire a gender dysphoric or other biologically opposed presenting individual (BOPI). The exemption would also accommodate a situation where a school fires a teacher who decides to transition (or present contrary to biological reality) after hiring. However, an adult primary workplace would not be able to rely on such an exemption. This amendment will simply expand the exclusions already available under Section 8 (2), where it states:

- (2) A person does not contravene this section by discriminating
 - (a) on the basis of sex, if the discrimination relates to the maintenance of public decency or to the determination of premiums or benefits under contracts of life or health insurance, or
 - (b) on the basis of physical or mental disability or age, if the discrimination relates to the determination of premiums or benefits under contracts of life or health insurance.

The suggested added amendment would stipulate something like:

- (2) A person does not contravene this section by discrimination

(c) on the basis of *Gender Identity* or *Gender Expression* if the discrimination relates to the maintenance of public decency, safety, biological sex rights, and/or minor children

10. That the *BC Human Rights Code* be amended to define that “sex” is determined by biology. That the word “female” is defined by the biological chromosomal make-up of a person, and that the words “woman” and “women” are defined meaning “female”.

11. The *BC Human Rights Code* be amended to stipulate that the word “Male” is defined by the biological chromosomal make-up of a person, and that the words “man” and “men” are defined as meaning “male”.

12. That a definition of “intersex” be included in the code to mean in the rare circumstances of chromosomal signature that fails to identify male or female.

13. That all government identification will state the biological sex of the individual as being “male” or “female” and determined by biological chromosomal reality typically associated with physical markers so as to protect the privacy, public decency of all people when using bathrooms, change rooms or all other facilities that ought to be safe places for women including, but not limited to, prisons.

14. That a sum of \$60,000. Will be paid to the Complainant group for the humiliation, fear, offense and demeaning them for being female by “welcoming” men into their private protected space.

15. Punitive damages in the amount of \$90,000. will be paid to the group as the Respondents exacerbated and actuated the harm by being those responsible for the protection of women’s rights and then knowingly assaulting their rights and deliberately violating the protection the law affords the group.

16. The Respondents will pay \$30,00. to the group member’s common organization, *Culture Guard*, to facilitate the development of educational resources for school distribution about this case and the rights of girls/women and boys/men to be protected.

STEP 7: SETTLEMENT MEETING

The Tribunal can provide a mediator to resolve the complaint informally and voluntarily. This is called a "**settlement meeting**". This is a free service. What is said during the settlement meeting is confidential and cannot be used against either party later.

Do you want to participate in a settlement meeting? **

☒

Yes

☐

No

STEP 8: COMPLETE THE COMPLAINT FORM

After you have filled out the complaint form:

- check the box to confirm that the information is true and accurate
- keep a copy of this complaint form and the documents
- send the complaint form to the Tribunal.

Check the following for:

☒

I confirm that the information in this complaint form is true and accurate to the best of my knowledge and belief. **

WHAT HAPPENS NEXT?

After the Tribunal has reviewed the complaint, it will tell you one of the following:

- the complaint form is complete, the Tribunal will accept it for filing, and a copy will be sent to the Respondent(s)
- the complaint form is incomplete and the Tribunal will ask you for further information by a certain date
- the complaint is deferred pending the outcome of other proceedings
- the complaint cannot be accepted for filing because:
 - the complaint is not covered by the *BC Human Rights Code* (it may be covered by the *Canadian Human Rights Act*)
 - the complaint does not set out enough information to support a complaint of discrimination under the *BC Human Rights Code*
 - the complaint was filed late and the Tribunal has decided not to accept it.

PROTECTION FROM RETALIATION

After a complaint is filed a complainant, anyone named in a complaint, a witness or anyone who assists in a complaint is protected from retaliation for their involvement in the complaint. You must show:

- a complaint was filed with the Tribunal;
- the person who retaliated knew about the complaint; and
- it is reasonable to conclude that the person intended to retaliate against someone because of their involvement in the complaint.

As of May 14, 2015, the Code also protects you from retaliation because someone thought you might make a complaint, be named in a complaint, or give evidence or assist in a complaint.

If the person you represent or someone else has been retaliated against, complete a Retaliation Complaint Form available on our website under Forms. File it with Part I of this form (Form 1.2).

HELP FILING YOUR COMPLAINT

For assistance with filing the complaint contact:

BC Human Rights Clinic

300 - 1140 W Pender Street

Vancouver BC V6E 4G1

Tel: 604-622-1100

Fax: 604-685-7611

Toll Free: 1-855-685-6222

www.bchrc.net

The Law Centre – University of Victoria Faculty of Law

225 - 850 Burdett Avenue

Victoria BC V8W 0C7

Tel: 250-385-1221

Fax: 250-385-1226

www.thelawcentre.ca

PRIVACY NOTICE

The Tribunal collects personal information to process complaints filed under the *Human Rights Code* and to conduct surveys to evaluate and improve its services under s. 59.1 of the *Administrative Tribunals Act*.

The personal information in this form may be disclosed to members of the public. This is because the Tribunal's process is public:

- The Tribunal publishes most decisions on its website
- The Tribunal publishes a hearing schedule (list of upcoming hearings) with the parties' names and the area and ground of a complaint
- After a complaint is on the hearing schedule, the public has access to information, including the complaint and response forms (except contact information)
- Hearings are open to the public.

You can ask the Tribunal to limit the information it makes public. However, the Tribunal will only do so if it decides that your privacy interests outweigh the public interest in access to the Tribunal's proceedings.

For more information, contact the Tribunal Registrar at the address or phone number at the top of this form.