Court File No. 40447

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

BETWEEN:

HIS MAJESTY THE KING

Appellant
(Respondent)

-and-

EDWIN TSANG

Respondent
(Appellant)

**MEMORANDUM OF ARGUMENT OF THE PROPOSED INTERVENERS,
WEST COAST LEGAL EDUCATION AND ACTION FUND ASSOCIATION and
WOMEN'S LEGAL EDUCATION AND ACTION FUND INC. (LEAF)**
(Pursuant to Rules 47, 55-59 of the *Rules of the Supreme Court of Canada*, S.O.R./2002-156)

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PART I – OVERVIEW AND FACTS

A. Overview

1. West Coast Legal Education and Action Fund Association (West Coast LEAF) and Women's Legal Education and Action Fund Inc. (LEAF) (the "proposed interveners") seek leave to intervene jointly in this appeal pursuant to Rules 47 and 55 to 59 of the *Rules of the Supreme Court of Canada* (the "Rules").

2. The decision under appeal concerns the appropriate scope of appellate scrutiny of trial judges' credibility assessments in sexual assault cases. Specifically, this Court will be called upon to clarify the application of the "rule against ungrounded common-sense assumptions" as distinct from the rule against stereotypical assumptions, to review those factual findings. The British Columbia Court of Appeal (BCCA) overturned the respondent's conviction for sexual assault, after finding that the trial judge erred in relying on common-sense assumptions in making credibility assessments, which it found were not grounded in the evidence.

3. The proposed interveners seek leave to intervene to assist the Court in its analysis of the issues raised in this appeal, the impact of which will reverberate beyond this decision and the parties in this case. If granted leave, the proposed interveners will submit that the "rule against ungrounded common-sense assumptions" should not be a standalone basis to review trial judges' credibility findings given the potential impact of its application on the dignity and equality of complainants in sexual assault proceedings. If this Court accepts the rule as a standalone basis for appellate review, clearer guidelines are required for it to be applied properly in sexual assault cases. West Coast LEAF and LEAF will bring a unique and intersectional lens to this appeal and explain how courts' interpretations of "ungrounded" inferences in assessments of credibility in sexual assault cases will disparately impact complainants, who are more likely to be women and girls, trans and non-binary people, particularly if they are Indigenous, Black, and/or racialized, and/or members of the 2SLGBTQ+ communities.

B. West Coast LEAF

4. West Coast LEAF is a non-profit society incorporated in British Columbia and registered federally as a charity with a mandate to use legally rooted strategies to create an equal and just society for all women and people who experience gender-based discrimination in British

Columbia. Through litigation, law reform, and public legal education informed by community engagement strategies, West Coast LEAF has contributed to developing equality rights jurisprudence and the meaning of substantive equality in Canada, both in specific challenges to discriminatory or unconstitutional laws or government actions, as well as in matters where statutory interpretation compromises the realization of substantive equality through the adverse effects of such interpretations. West Coast LEAF has considerable intervention experience before the Supreme Court of Canada in its own name and through participation in interventions brought by LEAF. Further, West Coast LEAF has subject matter expertise regarding the impacts of gender-based violence on equality rights under section 15 of the *Charter*, including where gender-based violence intersects with other axes of marginalization such as race, immigration status, refugee status, and disability.[1]

C. Women's Legal Education and Action Fund Inc. (LEAF)

5. LEAF is a national, non-profit organization committed to advancing the equality rights of all women, girls, trans and non-binary people, as guaranteed by section 15 of the *Charter*. LEAF has expertise and experience in substantive equality; the application of equality principles in the context of criminal law; and the lived reality of complainants in Canada, including the systemic barriers faced by victims of sexual violence seeking access to justice. LEAF has contributed extensively to the development of substantive equality rights under section 15 of the *Charter* through litigation, law reform initiatives and public education, and often especially for those who confront discrimination on multiple and intersecting grounds. LEAF has also intervened in almost every Supreme Court of Canada case that has set precedent in the law of sexual offences. It has played a critical role in shaping the interpretation of the sexual assault provisions of the *Criminal Code* in a manner that is consistent with balancing complainants' *Charter* rights – including their equality, dignity, and security rights.[2]

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[1] Affidavit of Pam Hrick, Motion Record of Proposed Interveners West Coast Legal Education and Action Fund Association and Women's Legal Education and Action Fund Inc., affirmed March 30, 2023 at paras. 7-23 [Affidavit of Pam Hrick].
[2] Affidavit of Pam Hrick, at paras. 24-34.

PART II – QUESTION IN ISSUE

6. The question on this motion is whether West Coast LEAF and LEAF should be granted leave to intervene in the appeal.

PART III – STATEMENT OF ARGUMENT

A. The Test for Leave to Intervene

7. The well-established test for leave to intervene is: (1) whether the proposed intervener has a real and substantial interest in the subject of the appeal; and (2) whether the proposed intervener can provide submissions that are useful and distinct from those of the parties.[3] West Coast LEAF and LEAF submit that they meet this test.

B. The Proposed Interveners' Real and Substantial Interest in this Appeal

8. West Coast LEAF and LEAF have a real and substantial interest in the subject matter of this appeal. This appeal will address the appropriate scope of appellate review of trial judge's credibility assessments in sexual assault cases. This is an issue of concern to the proposed interveners given the broad implications this Court's decision will have on access to justice for sexual assault complainants across Canada.

9. West Coast LEAF and LEAF have a demonstrated real and substantial interest in ensuring that the criminal law develops in a manner that promotes substantive equality and protects the security and dignity interests of sexual assault survivors. This Court's consideration of the "rule against ungrounded assumptions" engages concerns about appellate scrutiny of credibility assessments that could have a serious impact on complainants and the development of sexual assault law. Complainants in sexual assault cases are more likely to be women, girls, trans and non-binary people, including those who experience intersecting axes of marginalization arising from their race, sexual orientation, gender identity, disability status and age. The proposed interveners' expertise in respect of public interest litigation, intersectional equality rights, and access to justice issues would provide this Court with a distinct perspective on the issues in this appeal.

[3] SCC *Rules*, Rule 57(2); *Reference re: Workers' Compensation Act, 1983 (Nfld.),* [1989] 2 S.C.R. 335 at 339-341; *R. v. Finta,* [1993] 1 S.C.R. 1138.

C. Proposed Interveners' Submissions Would Be Useful and Distinct

10. If granted leave to intervene, the proposed interveners will not introduce new facts or evidence or expand the issues beyond those identified by the appellant. The proposed interveners will advance a useful perspective that will be distinct from the other parties. In particular, the proposed interveners intend to advance the arguments set out below, which relate directly to the issues raised in this appeal, as noted in the factum of the Appellant.[4]

a) The "rule against ungrounded common-sense assumptions" should not be a standalone basis to review trial judges' credibility findings

11. The "rule against ungrounded common-sense assumptions" – as distinct from the "rule against stereotypical assumptions"[5] – is increasingly being used by provincial appellate courts as a standalone basis to review trial judges' factual findings, particularly as they relate to credibility assessments in sexual assault cases.[6] As the decision on appeal illustrates, the rule as currently framed is too amorphous to be applied in a meaningful and consistent manner, is at odds with deference owed to trial judges' findings of fact, and risks undermining the dignity and equality rights of complainants and resurrecting prohibited twin myth reasoning.

12. The rule is framed at such a high level[7] that it allows appellate courts to substitute their own "common-sense" assumptions, untethered to the evidence, for the credibility findings made by trial judges. It permits appellate courts to do so whenever they accept that statements made by a trial judge to explain their credibility findings are simply "generalizations about human behaviour" as opposed to grounded in the evidence.[8] It is an error of law for a judge to base factual findings, including determinations of credibility, on stereotypical inferences about human

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[4] Appellant's Factum, Paras 5-10.

[5] See *R v JC*, 2021 ONCA 131 [*JC*], at paras. 57-74 where Paciocco JA distinguishes between these two rules.

[6] See, for example, *Bright v. R.*, 2020 NBCA 79; *R. v. J.L.*, 2018 ONCA 756; *R. v. Cepic*, 2019 ONCA 541; *R. v. Kodwat*, 2017 YKCA 11; *R. v. JC*, 2021 ONCA 131; *R. v. Roth*, 2020 BCCA 240.

[7] The "capaciousness" of the rule has been seen as both its strength and principal weakness: see, Lisa Dufraimont, "Current complications in the law on myths and stereotypes" (2021) 99 Can Bar Rev 536 at pp. 562-563.

[8] See, for example, *JC*, at paras. 61-62.

behaviour.[9] However, the rule does not target assumptions based on pernicious myths and stereotypes (whether in relation to complainants or accused, and disproportionately impacting individuals who are marginalized). Consequently, the rule is too vague to allow for meaningful appellate review. It allows appellate courts to sidestep this Court's longstanding jurisprudence underscoring the significant deference owed to a trial judge's findings of fact, particularly credibility assessments.[10] In some cases, appellate courts themselves are relying on "common-sense" assumptions, which are in turn rooted in myths and stereotypes about sexual assault complainants, when they substitute their findings for those of the trial judges.

13. If this rule continues to be applied by appellate courts as currently framed, there is a real risk that complainants will be asked highly intrusive, personal and traumatic questions about their sexual preferences, practices or even hypothetical behaviour as Crowns seek to "appeal proof" the record and guard against claims that there is no evidence to ground "common-sense assumptions" in judges' reasons. Decisions like the case at bar seem to suggest that additional evidence about personal preferences or predilections would be required to bolster a complainant's testimony about what occurred to "ground" a trial judge's factual findings. It is unclear what additional evidence an appellate court would require about a complainant's sexual practices to substantiate the trial judge's credibility assessment. In any event, the tacit requirement to adduce evidence of the complainant's "predilections"[11] would expose complainants to prejudicial and traumatic examination, a practice this Court has repeatedly cautioned against.[12]

14. Such a requirement would also open the door to prohibited twin myth reasoning,[13] and distort the trial process by reintroducing consideration of what is ultimately nothing more than

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[9] See, for example, *R. v. D.D.*, [2000] 2 S.C.R. 275; *R. v. A.R.J.D.*, 2018 SCC 6; *R v Quartey,* 2018 SCC 59.

[10] See, for example, *R v W.(R.),* 1992 CanLII 56 (SCC), [1992] 2 S.C.R. 122, at paras. 131-132; *Housen v Nikolaisen,* 2002 SCC 33; *Barendregt v Grebliunas,* 2022 SCC 22 at para. 104.

[11] *R. v. Tsang,* 2022 BCCA 346, at para. 19 [BCCA Decision].

[12] See, for example, *R v Goldfinch,* 2019 SCC 38 [*Goldfinch*] at para. 33 citing D.M. Tanovich, 'Whack' No More: Infusing Equality into the Ethics of Defence Lawyering in Sexual Assault Cases" (2013-2014), 45 Ottawa L Rev 495, at pp. 498-499.

[13] This could also lead to prolonged trial proceedings with the need for crowns to bring *Seaboyer* applications before introducing evidence of this nature: see *R v Barton,* 2019 SCC 33 [*Barton*]; *R. v. J.J.,* 2022 SCC 28, at para. 74.

propensity evidence under the guise of credibility assessment. Inviting or requiring evidence of complainants' "predilections" or propensities is prejudicial not only to their dignity and equality rights but also to trial integrity and fairness.

b) If the "rule against ungrounded common-sense assumptions" is a standalone basis for appellate review, clear guidelines must be set for its application

15. If this Court finds that the "rule against ungrounded common-sense assumptions" is an appropriate standard against which to review credibility findings, clear guidelines must be set to ensure both that it is a workable standard and that it is not misapplied. Appellate courts should be directed in applying the rule to (i) consider the entire evidentiary record; (ii) avoid substituting their own common-sense assumptions; and (iii) ensure that their review of credibility findings reflects the consent analysis set out in this Court's jurisprudence.

i) Appellate courts must consider the entire evidentiary record

16. Appellate courts applying the "rule against ungrounded common-sense assumptions" must consider the *entire evidentiary record* to determine whether the "assumption" has a foundation in the evidence. This is particularly essential where, as here, the impugned credibility finding relates to the complainant's consent, which this Court has held must be weighed in light of *all* of the evidence, including any ambiguous or contradictory conduct by the complainant.[14] Appellate courts applying this rule to review a trial judge's credibility findings in relation to consent must also consider the meaning of consent as defined in the *Criminal Code* and interpreted by this Court. Consent means the voluntary agreement to engage in the sexual activity in question, which will relate to "particular behaviours and actions" and will be tied to the specific context in the case.[15]

17. The decision in this case sheds light on the problems with an unduly restrictive and decontextualized approach to appellate review of a trial judge's credibility findings. Where, as here, an appellate court limits the evidence it considers relevant to those credibility findings to what happened *after* the complainant had agreed to engage in some sexual activity, it ignores the full context of events. There is no principled reason for not considering the totality of evidence as

[14] *R v Ewanchuk,* [1999] 1 S.C.R. 330 [*Ewanchuk*], at para. 61.
[15] *Criminal Code,* R.S.C., 1985, c. C-46, Section 273.1(1) CC; see also *R v Kirkpatrick,* 2022 SCC 33 [*Kirkpatrick*], at para. 40.

it relates to consent (and to assessing the basis of the judge's credibility findings on this issue). This approach runs counter to the longstanding jurisprudence of this Court.

18. The failure to consider the full evidentiary record can also lead courts to dismiss the importance of complainants' lived experiences as relevant to determining their state of mind in relation to consent. By way of example, the court below did not consider the complainant's evidence that she was engaging in a form of "risk management"[16] when deciding to agree to some sexual activity with the respondent in the back of his car as opposed to walking home alone in the early morning hours. The proposed interveners will submit that in assessing the wider context, the principles of substantive equality require the Court to consider the lived experience of being a woman, trans, or non-binary individual in navigating situations like that of the complainant. The failure to consider a complainant's evidence as to state of mind about whether (and why) she consented to touching taking place at the time it occurred is inconsistent with this Court's jurisprudence.

ii) Appellate courts must not substitute their own common-sense assumptions

19. Appellate courts applying this rule must avoid substituting their own common-sense assumptions for those they believe informed the trial judge's reasoning. This is particularly troubling where those assumptions are rooted in persistent myths and stereotypes about sexual assault complainants. By way of example, the court below seems to suggest that once the complainant had willingly engaged in some sexual activity, she was more likely to have consented to other sexual activity and that her claims that she did not consent to other sexual activity "after she willingly engaged in some sexual foreplay" were somehow less worthy of belief (or, at the very least, warranted more careful scrutiny by the trial judge). Both assumptions engage in twin-myth reasoning that is prohibited by subsection 276(1) of the *Criminal Code* and this Court's jurisprudence.[17] This type of reasoning also implicitly plays to troubling stereotypes about women who consume alcohol, including that they are "responsible for the consequences they suffer; sexually promiscuous or indiscriminate in their sexual choices; and more likely to lie about rape."[18]

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[16] *R. v. Tsang*, 2020 BCPC 306, at para 53 [BCPC Decision].
[17] See *R. v. Seaboyer; R. v. Gayme*, 1991 CanLII 76 (SCC), [1991] 2 SCR 577; *R v Darrach*, 2000 SCC 46 [*Darrach*]; *Goldfinch*; *Barton*.
[18] Elaine Craig, "Sexual Assault and Intoxication: Defining (in)Capacity to Consent" (2020) 98 Can Bar Rev 70 at pp. 105-106.

Directing appellate courts not to substitute their own common sense assumption will mitigate against this type of erroneous reasoning and help ensure complainants' equality interests are respected, while also ensuring trial fairness.

iii) Appellate courts' review of credibility as to consent must reflect a full and proper consent analysis

20. In reviewing trial judges' credibility findings on the issue of consent, appellate courts must take care to ensure that their assessment reflects the meaning of consent as set out in th*e Criminal Code*, and interpreted by this Court, including that consent must be specific, communicated, and reasonably ascertained. If that focus is not scrupulously maintained, the resulting analysis will be skewed and incomplete.

21. The approach adopted in the court below underscores the concerns that arise when a proper consent analysis is not undertaken. The court found that the "marked departure" in the complainant's behaviour in agreeing to some sexual activity warranted a "fresh start" in the analysis of her credibility on the issue of consent, but did not consider whether a marked change in the complainant's behaviour was relevant to assessing the respondent's evidence as to consent. While this case did not raise the defense of mistaken belief in communicated consent, this Court's guidance as to the need to take reasonable steps to ascertain consent had real resonance in the circumstances of this case. The trial judge found this to be true, referencing this Court's decision in *R. v. Barton.*[19] Yet this was not addressed by the BCCA despite their finding that there had been a marked departure in the complainant's behaviour.[20] The need to take reasonable steps to ascertain consent is "to protect the security of the person and equality of women who comprise the huge majority of sexual assault victims by ensuring as much as possible that there is clarity on the part of both participants to a sexual act."[21] The reasonable steps requirement "rejects the outmoded idea that women can be taken to be consenting unless they say "no""[22] or that consent can be assumed on the basis of passivity or silence.[23] This Court has stated that there are circumstances

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[19] BCPC Decision, at paras. 148-150.
[20] BCCA Decision, at para. 52.
[21] *Barton* at para. 105, citing M. Manning and P. Sankoff, Manning, Mewett & Sankoff: Criminal Law (5th ed. 2015), at p. 1094.
[22] *Barton,* at para. 105.
[23] *Barton,* at para. 105, referring to *R. v. Cornejo,* 2003 CanLII 26893 (ON CA), at para. 21.

where the reasonable steps requirement can be elevated, including where sexual activity is more invasive or where the accused and complainant are unfamiliar with each other, increasing the risk of miscommunications.[24]

22. Where, as here, the facts in a case callout for such steps to be taken, it is appropriate for a trial judge to consider this in the consent analysis (and for it to be weighed in the appellate review). Although the trial judge did so,[25] the Court of Appeal's decision was silent on the need for the respondent to ascertain consent to each and every sexual activity. Narrowly focusing on the evidence of whether intercourse occurred obfuscates the consent inquiry and the important question of whether reasonable steps were taken to ascertain the complainant's consent on a progressive basis, as required by the law of consent.

23. Clearer guidelines of this nature would help guard against some of the more troubling impacts of the application of the rule against ungrounded common-sense assumptions. It would assist towards addressing access to justice concerns for sexual assault complainants and would help to protect their dignity in these proceedings.

PART IV – COSTS

24. The proposed interveners seek no costs in the proposed intervention and request that none be awarded against it.

PART V – ORDER REQUESTED

25. The proposed interveners respectfully request that they be granted:

a. Leave to intervene in this appeal;

b. Leave to file a factum in accordance with Rules 37 and 42 and to make oral argument at the hearing of this appeal; and

c. Such further or other order as this Honourable Court may deem just.

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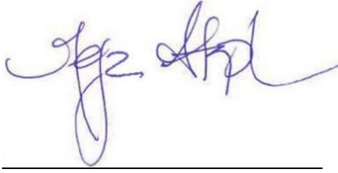
[24] *Barton*, at para. 108.

[25] BCPC Decision, at para. 150.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 3rd day of April 2023.



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PART VI – TABLE OF AUTHORITIES

Caselaw

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Secondary Sources

Secondary Sources	Paragraph
D.M. Tanovich, "'Whack' No More: Infusing Equality into the Ethics of Defence Lawyering in Sexual Assault Cases" (2013-2014), 45 Ottawa L Rev 495.	13
Elaine Craig, "Sexual Assault and Intoxication: Defining (in)Capacity to Consent" (2020) 98 Can Bar Rev 70.	19
Lisa Dufraimont, "Current Complications in the Law on Myths and Stereotypes" (2021) 99 Can Bar Rev 536.	12

Statutes, Regulations, Rules, etc.

Legislation/Other Sources	Rule, Section
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Code criminel, L.R.C. (1985), ch. C-46	s.273.1(1)
Rules of the Supreme Court of Canada, SOR/2002-156	Rule 47 Rule 55 Rule 57(2)
Règles de la Cour suprême du Canada, DORS/2002-156	Règle 47 Règle 55 Règle 57(2)

PART VII – STATUTES, LEGISLATION, RULES, ETC.

See Part VI.