

CANADIAN HUMAN RIGHTS TRIBUNAL

BETWEEN:

**FIRST NATIONS CHILD AND FAMILY CARING SOCIETY OF CANADA and
ASSEMBLY OF FIRST NATIONS**

Complainants

- and -

CANADIAN HUMAN RIGHTS COMMISSION

Commission

-and-

**ATTORNEY GENERAL OF CANADA
(representing the Minister of Indigenous and Northern Affairs Canada)**

Respondent

-and-

**CHIEFS OF ONTARIO, AMNESTY INTERNATIONAL CANADA, NISHNAWBE ASKI
NATION and FIRST NATIONS LEADERSHIP COUNCIL**

Interested Parties

-and-

ASSEMBLY OF MANITOBA CHIEFS

Moving Party

NOTICE OF MOTION

TAKE NOTICE THAT THE APPLICANT, THE ASSEMBLY OF MANITOBA CHIEFS (the “AMC”) makes this motion in writing to the Canadian Human Rights Tribunal (the “Tribunal”) located at 240 Sparks Street, 6th Floor West, Ottawa, Ontario.

THE MOTION IS FOR:

1. An order granting the AMC interested party status in this proceeding on the following terms, or such other terms as the Tribunal deems just:
 - a. to make oral and written arguments, as may apply in the course of the proceedings, of a length that may be fixed by the Tribunal and according to the timeline set by the Tribunal;
 - b. to submit documentary and testamentary evidence, and conduct cross-examinations, seeking orders in the proceedings;
 - c. participate in hearings, case conferences, mediation, negotiation or other dispute resolution or administrative processes in respect of the proceedings; and
 - d. AMC's participation will be on a without costs basis.
2. The AMC seeks interested party status in the proceeding generally, including but not limited to the upcoming Chiefs of Ontario and Nishnawbe Aski Nation motion.

THE GROUNDS FOR THE MOTION ARE:

1. The AMC has expertise and knowledge that will be of assistance to the Tribunal in determining the proceedings.
2. The AMC will bring a unique perspective to the proceedings.
3. The AMC's involvement will add to the legal position of the Parties with respect to the proceedings.
4. The AMC's interests are engaged by the issues in the proceedings.

THE FOLLOWING DOCUMENTS will be referred to in this motion for interested party status:

1. The written submissions of the AMC.
2. As per the instructions of the Tribunal, no affidavit has been filed, instead the following documents are referred to in the written submissions:
 - Assembly of Manitoba Chiefs, "About the AMC", online: <<https://manitobachiefs.com/about/about-amc/>>;
 - Assembly of Manitoba Chiefs, "Bringing Our Children Home, Report and Recommendations" (June 2014), online: <<https://manitobachiefs.com/wp-content/uploads/2017/11/Bringing-Our-Children-Home-Final-Report-June-2014.pdf>>;
 - Assembly of Manitoba Chiefs, "Certified Copies of Adopted Resolutions" (September 2016), *Re: First Nations Directives for Jordan's Principle*, online: <<https://manitobachiefs.com/wp-content/uploads/AMC-28th-AGA-Certified-Resolutions-Sept-2016.pdf>>;
 - Assembly of Manitoba Chiefs, "Certified Copies of Adopted Resolutions" (18 December 2024), *Re: First Nations in Manitoba Political, Legal and Communication*

- Strategy for Jordan's Principle*, online: <<https://manitobachiefs.com/wp-content/uploads/2024/12/AMC-Certified-Resolutions-December-18-2024.pdf>>;
- Assembly of Manitoba Chiefs, “*Certified Copies of Adopted Resolutions*” (July 2018), *Re: Replacing Jordan's Principle Terms of Reference Officials Working Group (TOROWG)*, online: <<https://manitobachiefs.com/wp-content/uploads/AMC-Certified-Resolutions-30th-AGA-July-2018.pdf>>;
 - Assembly of Manitoba Chiefs, “*Certified Copies of Adopted Resolutions*” (18 December 2024), *Re: Strengthening Equity Roundtable Governance and Addressing Systemic Challenges in Jordan's Principle Implementation*, online: <<https://manitobachiefs.com/wp-content/uploads/2024/12/AMC-Certified-Resolutions-December-18-2024.pdf>>;
 - Assembly of Manitoba Chiefs, “*Eagle Urban Transition Centre*”, online: <<https://manitobachiefs.com/eagle-urban-transition-centre/>>;
 - Assembly of Manitoba Chiefs, “*First Nations Charting Their Path*”, online: <<https://manitobachiefs.com/wp-content/uploads/2025/04/Jordans-Principle-Engagement-Report-Digital.pdf>>;
 - Assembly of Manitoba Chiefs, “*First Nations Family Advocate Office*”, online: <<https://manitobachiefs.com/advocacy/first-nations-family-advocate-office/>>;
 - Assembly of Manitoba Chiefs, “*History & Mandate*”, online: <<https://manitobachiefs.com/about/history-mandate/>>;
 - Assembly of Manitoba Chiefs, “*Jordan's Principle*”, online: <<https://manitobachiefs.com/advocacy/jordans-principle/>>;
 - Assembly of Manitoba Chiefs, “*Manitoba and Canada Fight First Nations in Court over the Collective Harms from the Child Welfare System*” (1 April 2025), online: <https://manitobachiefs.com/press_releases/manitoba-and-canada-fight-first-nations-in-court-over-the-collective-harms-from-the-child-welfare-system/>;
 - Assembly of Manitoba Chiefs, “*Reports*”, online: <<https://manitobachiefs.com/resolutions-reports/reports/>>;
 - Assembly of Manitoba Chiefs, “*Setting the Foundation for Change, A Strategy towards First Nations' jurisdiction of child welfare in Manitoba*” (March 2018), online: <<https://manitobachiefs.com/wp-content/uploads/FNWC-Session-Final-Report-Web.pdf>>;
 - Assembly of Manitoba Chiefs and First Nations Family Advocate Office, “*Keewaywin: Our Way Home, Manitoba First Nations Engagement on First Nations Child and Family Services*” (September 2017), online: <https://manitobachiefs.com/wp-content/uploads/2017/11/Final-FNCFS-Reform-Engagement-Report_September-2017.pdf>;
 - Assembly of Manitoba Chiefs, “*Constitution of the Assembly of Manitoba Chiefs*” (September 1994, as amended April 30, May 1 & 2, 2024), online

- <https://manitobachiefs.com/wp-content/uploads/2024/05/24-04-28-AMC-Constitution-Amended-Final.pdf>>;
- Government of Canada, “*Jordan’s Principle Operational Bulletin*”, (10 February 2025), online: <<https://www.sac-isc.gc.ca/eng/1739222520301/1739222546551>>;
 - Indigenous Services Canada, “*Government of Canada recognizes Eagle Urban Transition Centre in supporting First Nations children off-reserve through Jordan’s Principle*” (19 October 2018), online: <<https://www.canada.ca/en/indigenous-services-canada/news/2018/10/government-of-canada-recognizes-eagle-urban-transition-centre-in-supporting-first-nations-children-off-reserve-through-jordans-principle.html>>;
 - Kenny, K.S., Wall-Wieler, E., Frank, K. et al., “*Inequities in child protective services contact among First Nations and non-First Nations parents in one Canadian province: a retrospective population-based study*”, *BMC Public Health* 25, 1224 (2025), online: <<https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-025-21813-5#citeas>>;
 - NationTalk, “*AMC and Canada Sign Historic Memorandum of Understanding on Jordan’s Principle Implementation*” (June 27, 2024), online: <<https://www.indigenouswatchdog.org/update/amc-and-canada-sign-historic-memorandum-of-understanding-on-jordans-principle-implementation/>>;
 - Assembly of Manitoba Chiefs, “*Memorandum of Understanding between Assembly of Manitoba Chiefs as represented by its Grand Chief and Her Majesty the Queen in Right of Canada as represented by the Ministers of Indigenous Services Canada and Crown-Indigenous Relations and Northern Affairs*” (7 December 2017), online: <<https://manitobachiefs.com/wp-content/uploads/AMC-Canada-MOU-on-Child-Welfare-Signed-Document.pdf>>;
 - Ozten Shebahkeget, “*Manitoba CFS intervened with 50% of First Nations parents from 1998 to 2019: study*” (8 April 2025), online: <<https://www.cbc.ca/news/canada/manitoba/child-family-services-first-nations-study-1.7504926>>; and
 - Sinha, V., Sangster, M., Gerlach, A.J., Bennett, M., Lavoie, J.G. & Lach, L, Balfour, m. & Folster S., “*The Implementation of Jordan’s Principle in Manitoba: Final report*” (2022), online: <<https://manitobachiefs.com/wp-content/uploads/22-01-28-The-Implementation-of-Jordans-Principle-in-Manitoba-Final-Report.pdf>>.

All of which is respectfully submitted this 15th day of April 2025.



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