

**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

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**WRITTEN SUBMISSIONS OF THE ASSEMBLY OF MANITOBA CHIEFS  
on its motion for interested party status**

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## PART I – STATEMENT OF FACTS

### A. Introduction

1. The Assembly of Manitoba Chiefs (“AMC”) applies pursuant to sections 48.9(2)(b) and 50(1) of the *Canadian Human Rights Act* (“CHRA”) and Rule 8(1) of the *Canadian Human Rights Tribunal Rules of Procedure* (03-05-04) (“CHRT Rules”) for interested party status in the within proceedings.
2. The AMC brings this motion because of the potential significant impact of these proceedings on First Nations in Manitoba. The AMC’s expertise and perspective will be of significant assistance to the Tribunal.

### B. Background

3. The procedural background of the proceedings has been discussed at length in numerous motions and decisions by the Canadian Human Rights Tribunal (the “Tribunal”) and will not be reproduced in these submissions due to the page limitation.

#### Assembly of Manitoba Chiefs

4. The AMC is the political and technical coordinating organization for all 63 First Nations in Manitoba (the “member First Nations”), which in turn represent more than 172,000 First Nations citizens in the province. The AMC represents a diversity of Anishinaabe, Nehetho/Ininew, Anishinew, Denesuline, and Dakota Oyate people, accounting for approximately 12% of the provincial population.<sup>1</sup>
5. The AMC’s member First Nations exercise Inherent and Treaty rights over their reserve land and traditional territories. Member First Nations include adherents to Treaties 1, 2, 3, 4, 5, 6, 10 and the Dakota Nations that are party to a pre-Confederation Treaty with the Crown.
6. The AMC’s mandate is set out in its Constitution, which provides, among other things, that the AMC will promote, preserve and protect the Aboriginal and Treaty rights of First Nations people in Manitoba, and will affirm First Nations rights as peoples to exercise and practice self-determination and self-governance, including through protecting the integrity and authority of each First Nation’s customs, laws and practices.<sup>2</sup>

#### AMC’s Advocacy

7. The AMC was founded by Chiefs of First Nations in Manitoba in 1988 to build consensus on issues and priorities for First Nations in Manitoba.<sup>3</sup> The AMC provides a unified voice for First

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<sup>1</sup> Assembly of Manitoba Chiefs, “About the AMC”, online: <<https://manitobachiefs.com/about/about-amc/>>.

<sup>2</sup> 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>>.

<sup>3</sup> Assembly of Manitoba Chiefs, “History & Mandate”, online <<https://manitobachiefs.com/about/history-mandate/>> [AMC, *History and Mandate*].

Nations in pursuing relevant and important issues. This includes advocating on behalf of First Nations in Manitoba by intervening in cases of relevance to these First Nations.<sup>4</sup>

8. In *Dakota Ojibway Child and Family Services v KRF*, the AMC intervened on the issue of the importance of cultural connectivity in making permanent orders of guardianship.<sup>5</sup> The AMC was also granted intervener status in *Canada v Pictou Landing Band Council*, an appeal which arose from Canada's decision to refuse a First Nation's request for funding to provide care for a child with severe disabilities in accordance with Jordan's Principle.<sup>6</sup>
9. The AMC is one of the plaintiffs in a current claim against Canada and Manitoba regarding the collective harms inflicted on First Nations through decades of systemic failure in the child welfare system. The action alleges that Manitoba and Canada have carried out longstanding efforts to assimilate First Nations and destroy their distinct cultures by unnecessarily apprehending children and failing to provide them with culturally and spiritually appropriate services and placements. The action further alleges that the actions of Manitoba and Canada have severed children's connections to their cultures, languages and traditions, and created intergenerational harms and adverse social and economic impacts on First Nations.<sup>7</sup>
10. The AMC has been on the forefront of policy work advocating for the implementation of Jordan's Principle and to address systemic funding challenges. The AMC is the collective voice of the member First Nations by way of resolutions made by the Chiefs-in-Assembly, which consists of the Chiefs from all the member First Nations.<sup>8</sup> Chiefs-in-Assembly have resolved, among other things to:
  - a. support action for the implementation of Jordan's Principle, and mandate action to be led by the AMC Chiefs Task Force on Health;<sup>9</sup>

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<sup>4</sup> Some of the AMC's interventions include: *Reference re An Act Respecting First Nations, Inuit and Métis children, youth and families*, 2024 SCC 5; *Anderson v Alberta*, 2022 SCC 6; *Southwind v Canada*, 2021 SCC 28; *References re Greenhouse Gas Pollution Pricing Act*, 2021 SCC 11; *Conseil scolaire/francophone de la Colombie – Britannique v British Columbia*, 2020 SCC 13; *Williams Lake Indian Band v Canada*, 2018 SCC 4; *Dube v Canada*, 2011 SCC 39 and *Bastien Estate v Canada*, 2011 SCC 38; *R v Badger*, (1996) 1 SCR 771; *R v Pamajewon*, (1996) 2 SCR 81.

<sup>5</sup> *Dakota Ojibway Child and Family Services v KRF et al*, 2018 MBCA 104.

<sup>6</sup> *Canada (Attorney General) v Pictou Landing Band Council*, A-158-13 (FCA) (ultimately discontinued by Canada).

<sup>7</sup> 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/](https://manitobachiefs.com/press_releases/manitoba-and-canada-fight-first-nations-in-court-over-the-collective-harms-from-the-child-welfare-system/)>; *Chief Heidi Cook v The Government of Manitoba*, CI22-01-37801 (MBKB).

<sup>8</sup> AMC, *History and Mandate*.

<sup>9</sup> Assembly of Manitoba Chiefs, "Certified Copies of Adopted Resolutions" (September 2016), *Re: First Nations Directives for Jordan's Principle*: Page 1 (preamble), online: <<https://manitobachiefs.com/wp-content/uploads/AMC-28th-AGA-Certified-Resolutions-Sept-2016.pdf>>.

- b. create a “Jordan’s Principle Equity Roundtable”, which contains three components: (1) the Technical Advisory Group; (2) the First Nations Advisory Table; and (3) The Senior Tripartite Table;<sup>10</sup> and
  - c. reaffirm the AMC’s commitments to the principles and intent of Jordan’s Principle and establish a First Nations Advisory Table as a Chiefs’ Task Force.<sup>11</sup>
11. The AMC has extensive involvement in studies, projects and initiatives related to First Nations child and family wellness, including:
- a. *Keewaywin: Our Way Home, Manitoba First Nations Engagement on First Nations Child and Family Services* (the “*Keewaywin Report*”)<sup>12</sup>,
  - b. the *Implementation of Jordan’s Principle in Manitoba Final Report* (the “*Jordan’s Principle Implementation Report*”)<sup>13</sup>,
  - c. the *Setting the Foundation for Change Report*<sup>14</sup>,
  - d. the *Bringing our Children Home Report and Recommendations*<sup>15</sup>,
  - e. *Inequities in child protective services contact among First Nations and non-First Nations parents in one Canadian province: a retrospective population-based study*<sup>16</sup>, and

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<sup>10</sup> 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>>.

<sup>11</sup> 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>> [AMC Resolution, DEC-24.02].

<sup>12</sup> 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](https://manitobachiefs.com/wp-content/uploads/2017/11/Final-FNCFS-Reform-Engagement-Report_September-2017.pdf)> [Keewaywin Report].

<sup>13</sup> 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>> [Jordan’s Principle Implementation Report].

<sup>14</sup> 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>>.

<sup>15</sup> 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>>.

<sup>16</sup> 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://bmcpublikealth.biomedcentral.com/articles/10.1186/s12889-025-21813-5#citeas>>. Note: this was a joint study with the AMC.

f. *First Nations Charting Their Path: Jordan's Principle Knowledge Translation Engagement Report*.<sup>17</sup>

12. The AMC Women's Council and Grandmother's Council oversee the Jordan's Principle Service Coordination Project, which implements the recommendations identified in the *Keewaywin Report* and the *Jordan's Principle Implementation Report*.<sup>18</sup> In addition, the Women's Council oversees the child and family welfare file at the AMC, and developed the foundational strategy set out in the *Setting the Foundation for Change Report*, to assist in navigating the current Manitoba child and family services landscape. It is also meant to guide further work on the AMC and Canada's Memorandum of Understanding ("MOU") on child welfare reform.<sup>19</sup>
13. The AMC has signed two MOUs of relevance with Canada in relation to Jordan's Principle and child welfare reforms. On December 7, 2017, an MOU was entered into to establish joint discussions to improve the wellbeing of First Nations, children, youth and families within the context of child and family services.<sup>20</sup> In 2024, the AMC also signed an MOU with Canada to enhance the implementation of Jordan's Principle for First Nations children, youth and families in Manitoba. A key element of the 2024 MOU was a provision to support First Nations-led implementation of Jordan's Principle.<sup>21</sup>

#### AMC's Service Provision

14. On June 1, 2015, the AMC established the First Nations Family Advocate Office ("FNFAO"). FNFAO received the name "Abinoojiyak Bigiiwewag", meaning "Our Children are Coming Home", during a ceremonial opening. FNFAO's work encompasses comprehensive support for the entire family while advocating for First Nation-led solutions to address the CFS crisis in Manitoba. Since its inception, FNFAO has processed intake for over eight hundred families striving to have their children returned from child and family services care to their homes and Nations. FNFAO operates independently from Manitoba's child and family services system.<sup>22</sup>
15. The Eagle Urban Transition Centre ("EUTC") was created by the Assembly of Manitoba Chiefs to assist First Nations moving to an urban centre by providing support, advocacy and

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<sup>17</sup> Assembly of Manitoba Chiefs, "*First Nations Charting Their Path*", online: <<https://manitobachiefs.com/wp-content/uploads/2025/04/Jordans-Principle-Engagement-Report-Digital.pdf>>.

<sup>18</sup> Assembly of Manitoba Chiefs, "*Jordan's Principle*", online: <<https://manitobachiefs.com/advocacy/jordans-principle/>>.

<sup>19</sup> Assembly of Manitoba Chiefs, "*Reports*", online: <<https://manitobachiefs.com/resolutions-reports/reports/>>.

<sup>20</sup> 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>>.

<sup>21</sup> NationTalk, "*AMC and Canada Sign Historic Memorandum of Understanding on Jordan's Principle Implementation*" (27 June 2024), online: <<https://www.indigenouswatchdog.org/update/amc-and-canada-sign-historic-memorandum-of-understanding-on-jordans-principle-implementation/>>.

<sup>22</sup> Assembly of Manitoba Chiefs, "*First Nations Family Advocate Office*" online: <<https://manitobachiefs.com/advocacy/first-nations-family-advocate-office/>> [AMC, FNFAO].

access to needed programs.<sup>23</sup> The EUTC was the first organization to provide a regional response to assist off-reserve First Nations children who have needs under Jordan’s Principle. The EUTC also provides respite services for caregivers and acts as an advocate for First Nations children to access other government programs. As such, AMC not only leads in its advocacy and justice work but, through the EUTC, is also a Jordan’s Principle service provider.<sup>24</sup>

### Recent AMC Advocacy

16. Recent changes by Canada to the Jordan’s Principle program have created issues for First Nations in Manitoba, which compelled the AMC to file the within motion for interested party status. Funding shortfalls and delays by Canada in relation to the Jordan’s Principle program have impacted the ability of First Nations in Manitoba to adequately meet the needs of children, youth and families.<sup>25</sup> Canada has also changed the structure of Jordan’s Principle, without consultation or consent of First Nations to a centralized, top-down model, which undermines First Nations’ decision-making authority in Manitoba, increases bureaucratic delays, and disrupts funding of essential support for First Nations in Manitoba.<sup>26</sup>
17. In response to these changes, among other things, the AMC directed a Chiefs Task Force to focus on addressing “systemic challenges caused by [Canada’s] centralized decision-making and Manitoba Region’s administration”, and advocate for “culturally relevant, community-based support for First Nations children and families.” The AMC demanded that Canada end the top-down approach by restoring decision-making authority to First Nations Leadership.<sup>27</sup> The Chiefs-in-Assembly have called on Canada to immediately commit to addressing the backlog of Jordan’s Principle requests and to ensure that the outstanding proposals submitted by First Nations and First Nations organizations in Manitoba are adequately addressed.<sup>28</sup>

## **PART II – ISSUES AND LAW**

18. The sole issue in this motion is whether AMC should be granted interested party status to participate in the proceedings, and if so, under what terms. Consistent with the Tribunal’s previous ruling, this application properly proceeds under the *CHRA Rules* that were applicable

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<sup>23</sup> Assembly of Manitoba Chiefs, “Eagle Urban Transition Centre”, online: <<https://manitobachiefs.com/eagle-urban-transition-centre/>>.

<sup>24</sup> 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>>.

<sup>25</sup> 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>> [AMC Resolution, DEC-24.01].

<sup>26</sup> AMC Resolution, DEC-24.02.

<sup>27</sup> AMC Resolution, DEC-24.02.

<sup>28</sup> AMC Resolution, DEC-24.01.

to previous interested party rulings in this case, rather than the rules currently in force, and the Tribunal's previous caselaw is still applicable.<sup>29</sup>

19. Rule 8 of the *CHRA Rules* and section 50(1) and 48.9(2)(b) of the *CHRA* are applicable to this motion.<sup>30</sup> These establish that the Tribunal has the broad jurisdiction "to allow any interested party to intervene before this Tribunal in regard to a complaint."<sup>31</sup> The onus is on the applicant to demonstrate how its expertise will be of assistance in the determination of the issues. Interested party status will not be granted if it does not add significantly to the legal positions of the parties representing a similar viewpoint.<sup>32</sup>
20. Further, the Tribunal should adopt a case-by-case holistic approach in considering requests for interested party status, which takes into account its responsibility to conduct proceedings expeditiously and informally in determining the extent of an interested party's participation.<sup>33</sup> The Tribunal should perform its analysis flexibly and holistically, considering whether:
  - a. the prospective interested party's expertise will be of assistance to the Tribunal;
  - b. its involvement will add to the legal positions of the parties; and
  - c. the proceeding will have an impact on the moving party's interests.<sup>34</sup>

#### **A. The AMC's Expertise and Knowledge**

21. The AMC has expertise and knowledge that will be of assistance to the Tribunal in determining the issues in the proceedings, and can contribute to the proceedings in a significant, relevant and useful manner. As outlined above, regarding the AMC's advocacy and service provision, the AMC has been at the forefront of advocacy for Jordan's Principle and child and family wellness advocacy for First Nations governments and citizens in Manitoba.<sup>35</sup> The AMC's expertise and knowledge are directly related to the proceedings, as well as the issues and arguments being considered by the Tribunal.

#### **B. The AMC will bring a unique perspective**

22. If granted interested party status in the proceedings, the AMC will bring a unique and helpful perspective to the issues. The AMC represents the broad interests of all First Nations in Manitoba. Each of the 63 First Nations in Manitoba have unique cultures, legal traditions, histories and experiences. The AMC will speak to the importance of ensuring that remedies in

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<sup>29</sup> *First Nations Child & Family Caring Society of Canada et al v Attorney General of Canada (representing the Minister of Indigenous and Northern Affairs Canada)*, 2024 CHRT 95 [2024 CHRT 95] at paras 27-28.

<sup>30</sup> *Canadian Human Rights Act*, RSC 1985, c. H-6 at s. 50 and *Canadian Human Rights Tribunal Rules of Procedure*, (03-05-04) at ss. 8(1).

<sup>31</sup> 2024 CHRT 95 at para 30.

<sup>32</sup> 2024 CHRT 95 at para 31; referring to *Canadian Association of Elizabeth Fry Societies and Acoby v Correctional Service of Canada*, 2019 CHRT 30 at para 34.

<sup>33</sup> 2024 CHRT 95 at para 32; referring to *First Nations Child and Family Caring Society et al v Attorney General of Canada (for the Minister of Indian and Northern Affairs Canada)*, 2016 CHRT 11 at para 3.

<sup>34</sup> 2024 CHRT 95 at para 33.

<sup>35</sup> see Part I(B) of these written submissions.

the within proceedings adequately reflect the diversity and respect the sovereignty of First Nations in Manitoba.

23. The AMC has long advocated for a distinctions-based approach that rightfully acknowledges the unique position of First Nations as Treaty partners with the Crown and as the original inhabitants of the land that is now called Manitoba and Canada. The AMC further advocates for an approach that is centred in the understanding that “Self-determination in services is consistent with a growing focus on cultural safety in service provision, and is increasingly recognized as being fundamental to fostering the health and wellbeing of Indigenous children.”<sup>36</sup>
24. The AMC’s advocacy conforms with the approach outlined in the *Keewaywin Report* for long-term Jordan’s Principle implementation, which includes restoring First Nations’ jurisdiction.<sup>37</sup> The AMC is able to draw upon its extensive institutional knowledge, experience as an advocate, and through its provision of supports and programs to First Nations citizens in Manitoba to provide a unique perspective.
25. It is particularly important for the Tribunal to consider the distinct perspective of First Nations governments in Manitoba. There are approximately 12,000 children under the care of child and family services in Manitoba, and 90 percent of them are Indigenous.<sup>38</sup> Recent studies indicate that over 50% of First Nations parents from 1998 to 2019 in Manitoba had an open file with child protective services, which is almost four times higher compared with non-First Nations parents.<sup>39</sup>
26. The AMC can speak to the importance of acknowledging and considering this diverse group of First Nations in crafting remedies, considering arguments and making orders. Given its role in various projects that relate to Jordan’s Principle, long-term reform of the First Nations child and family services program, and First Nations children and families in Manitoba, the AMC is uniquely positioned to provide the specific perspective and direct experiences of the approximately 172,000 First Nations citizens in Manitoba.

### **C. The AMC’s involvement will add to the legal positions of the parties**

27. The AMC has a unique perspective and expertise that will add to the legal position of the parties. The AMC’s member First Nations have diverse and distinct child rearing practices that are grounded in the knowledge, language, culture, economy and worldview of each First Nation. First Nations in Manitoba have their own laws around and systems of caring for and educating children.<sup>40</sup>

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<sup>36</sup> *Jordan’s Principle Implementation Report*, 14.

<sup>37</sup> *Jordan’s Principle Implementation Report*, 44.

<sup>38</sup> AMC, *FNFAO*.

<sup>39</sup> 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>>.

<sup>40</sup> *Jordan’s Principle Implementation Report*, 10.



28. Jordan’s Principle implementation evolved in Manitoba, in line with previous Tribunal rulings, shifting from a focus on children with special needs and responding to First Nations requests, to a more expansive approach focused on meeting the needs of First Nation children. This led to the development of First Nations and Manitoba regional-level programs.<sup>41</sup> The AMC and its member First Nations are now concerned that Canada is backtracking on that approach to re-establish the same centralized approach that failed First Nations families and children in the first place.<sup>42</sup>
29. Since 1988, the AMC has been advocating and advancing the special interests of its member First Nations and their citizens. As referenced AMC has demonstrated expertise intervening in court matters. For these reasons, it is important for the Tribunal to hear from the AMC and to ensure that there are submissions before the Tribunal which represent the unique perspective of First Nations in Manitoba.

#### **D. Impact on the AMC’s interests**

30. First Nations and their children and families in Manitoba will be directly impacted by these proceedings and any orders made by the Tribunal. As the collective advocacy body for all First Nations in Manitoba, the AMC is directly interested in these proceedings. The AMC also provides supports for First Nations in Manitoba at the regional, First Nation-level, family and individual level in relation to child and family wellness, health and Jordan’s Principle.

### **PART III – ORDER SOUGHT**

31. The AMC seeks an order granting it interested party status for all aspects of the proceeding on the following terms, or on 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. to 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.

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<sup>41</sup> *Jordan’s Principle Implementation Report*, 40-43.

<sup>42</sup> Government of Canada, “*Jordan’s Principle Operational Bulletin*” (10 February 2025), online: <<https://www.sac-isc.gc.ca/eng/1739222520301/1739222546551>>.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of April, 2025



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## **TABLE OF AUTHORITIES**

### **Cases**

*Anderson v Alberta*, 2022 SCC 6

*Canadian Association of Elizabeth Fry Societies and Acoby v Correctional Service of Canada*, 2019 CHRT 30

*Conseil scolaire/francophone de la Colombie – Britannique v British Columbia*, 2020 SCC 38

*Dakota Ojibway Child and Family Services v KRF et al*, 2018 MBCA 104

*First Nations Child and Family Caring Society et al v Attorney General of Canada (for the Minister of Indian and Northern Affairs Canada)*, 2016 CHRT 11

*First Nations Child & Family Caring Society of Canada et al v Attorney General of Canada (representing the Minister of Indigenous and Northern Affairs Canada)*, 2024 CHRT 95

*References re An Act Respecting First Nations, Inuit and Métis children, youth and families*, 2024 SCC 5

*References re Greenhouse Gas Pollution Pricing Act*, 2021 SCC 11

*R v Badger*, (1996) 1 SCR 771

*R v Pamajewon*, (1996) 2 SCR 81

*Southwind v Canada*, 2021 SCC 28

### **Statutes**

*Canadian Human Rights Act*, RSC 1985, c. H-6

*Canadian Human Rights Tribunal Rules of Practice and Procedure* (03-05-04)