

FEDERAL COURT
CLASS PROCEEDING

BETWEEN:

JOE DAVID NASOGALUAK

Plaintiff

- and -

ATTORNEY GENERAL OF CANADA

Defendant

**Class Proceeding commenced under Part 5.1 of the
*Federal Courts Rules, SOR/98-106***

STATEMENT OF DEFENCE

OVERVIEW

1. This lawsuit is brought on behalf of individuals who allege they were assaulted while detained or in the custody of the RCMP and further, that the assault was caused by His Majesty the King's (Canada) funding, oversight, operation, supervision, control, maintenance and support of RCMP detachments. As framed, this claim challenges 90 years of policy decisions and actions of various unidentified Crown servants in 61 detachments across northern Canada. The asserted duty of care, breach, and causation are pled generally, without specificity, and cover a significant breadth of geography, timeline and subject matter. Canada states that Canada does not owe the asserted private law duty of care to the class. Funding, oversight, operation, supervision, control,

maintenance, and support of RCMP detachments are core policy decisions. Moreover, they do not breach any *Charter* right, either individually or on a class-wide basis.

2. Canada is committed to reconciliation and a renewed relationship with Indigenous peoples based on recognition of rights, respect, cooperation and partnership. When required to respond to litigation, Canada endeavours to be constructive in assisting the Court in its task of adjudicating the matters brought before it.

Response to the Plaintiff's Allegations

3. Canada denies that the class is entitled to the relief sought against Canada outlined in paragraphs 1 (b) to (l).

4. Canada admits the assertions contained in paragraphs 10, 11, 16, 17, 19, 21, 28, 38, 62, 67, the first sentence of paragraph 5, the first three sentences of paragraph 7, and the first two sentences of paragraph 32 of the Claim. Details of Canada's admissions are set out below.

5. Canada denies the assertions contained in paragraphs 3, 4, 6, 15, 22, 23, 25, 30, 31, 33, 34, 36, 37, 40, 41, 42, 43, 45, 47, 48, 49, 50, 52 to 61, 63 to 66, 68 to 79, the last two sentences of paragraph 5, the last two sentences of paragraph 7, and the first sentence of paragraph 39 of the Claim. Details of Canada's denials are set out below.

6. Canada has no knowledge of the assertions in paragraph 3 respecting the motivation of the plaintiff in bringing the Claim, the allegation contained in paragraphs 29, the last sentence of paragraph 32, and the last sentence of paragraph 39 of the Claim.

7. Canada either admits or denies the remaining paragraphs or sentences, in part or with qualifications, as described below.

8. Canada states that paragraphs 24 and 30 of the Claim do not contain material facts to substantiate the Claim and are advanced by argument or supposition. Canada does not plead to the assertions therein to the extent that these paragraphs or parts of them constitute arguments or mere supposition.

Definitions

9. The Claim refers to assault without distinguishing between assault, battery, and the use of force. The representative plaintiff has confirmed that “assault” in the Claim means “an attack on a person’s body or the use of force against them, and not for its legal meaning in tort.”

10. In this Statement of Defence,

- a) “battery” means the direct physical contact with a person’s body (what the plaintiff calls “assault”);
- b) “class” means all Aboriginal Persons who allege they were assaulted at any time while being held in custody or detained by RCMP officers in the Territories, and were alive as of December 18, 2018;
- c) “class period” means the period from January 1, 1928 to December 19, 2018;
- d) “excessive force” means force used in excess of that force reasonable and proportional to the circumstances surrounding the use of force in the circumstances of a particular interaction, with reference to section 25 of the *Criminal Code*;
- e) “funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments” will sometimes be called “the asserted duty of care.”

The Parties

11. In response to paragraph 7 of the Claim, Canada admits that the representative plaintiff, Joe David Nasogaluak, (the plaintiff) was 16 years old at the time the Claim was commenced, resided in Tuktoyaktok, Northwest Territories and is Indigenous.

12. In response to paragraph 9 of the Claim, Canada admits that the RCMP is Canada’s national police force established pursuant to the *Royal Canadian Mounted Police Act*, RSC 1985, c R-10.

13. In further response to paragraphs 9, 20 and 81 of the Claim, Canada states that the Attorney General of Canada defends this action on behalf of the federal Crown pursuant to sections 3, 10 and 23 of the *Crown Liability and Proceedings Act*, RSC 1985, c C-50 (*CLPA*), and acknowledges that the federal Crown is vicariously liable for the negligent acts and omissions of Crown servants, but only when they act in their official capacities, in good faith, and within the scope of their employment. Canada acknowledges that RCMP officers are deemed to be servants of the federal Crown for purposes of the *CLPA*. Canada denies it is liable for the acts or omissions of agents or

officers from other police forces operating under the jurisdiction or command of Canada and/or the RCMP.

14. Canada further states that in the context of this Claim, Canada's liability (which is denied) would be limited to liability for the actions of Crown servants in respect of the funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories, but specifically states that those actions did not give rise to an actionable wrong.

FACTUAL CONTEXT

The RCMP's Current Mandate and Structure

15. The RCMP has a long history of policing in the Territories dating back almost 150 years. Like the people it serves, the RCMP has grown and evolved in its work in the Territories over the course of this period.

16. In response to paragraph 12 of the Claim, Canada admits that the RCMP's current mandate includes preventing and investigating crime, preserving the peace, and enforcing laws. In addition, the RCMP's current mandate includes apprehending criminals and offenders and others who may lawfully be taken into custody; executing warrants; and duties and services related to warrants.

17. The RCMP operates under four levels of management: national, divisional, district and detachment-level. The RCMP is headed by the RCMP Commissioner, who, under the direction of the Minister of Public Safety and Emergency Preparedness, has the control and management of the RCMP and all matters connected with the RCMP, and is supported by an Executive Committee of national and regional officials.

18. Canada admits paragraphs 14 and 46 of the Claim, but with the qualification that section 25 of the *Criminal Code*, RSC 1985, c C-46 also states that persons are justified in using as much force as is necessary to do anything which the person is required or authorized by law to do, so long as the person is acting on reasonable grounds, and further states that peace officers are justified in using force in circumstances set out in sections 25(4) and (5) of the *Criminal Code*. Further, like other persons, police officers are entitled to use reasonable force to defend themselves or other persons.

19. In response to paragraph 18 of the Claim, Canada admits that it has entered into formal “Police Service Agreements” with respect to policing in the Territories and states that the particulars of these agreements will be shown at the trial of this action.

20. In response to paragraph 19 of the Claim, Canada states that the RCMP currently operates RCMP detachments in the different Territories listed. The particulars of when the RCMP operated these detachments will be shown at the trial of this action.

RCMP Use of Force and Other Policies

21. Throughout its history, the RCMP has operated within a robust and comprehensive policy framework regarding use of force by RCMP members. In the interest of public and police safety, RCMP members have been appropriately trained on police intervention options, including the use of force, in a reasonable manner given the circumstances and conditions of the time.

22. In response to paragraphs 15, 22, 23, 30 and 42 of the Claim, Canada denies that Indigenous persons in the Territories are improperly targeted or frequently arrested, detained or held in custody by RCMP officers on the basis of their race, ethnic or national origin, ancestry, or beliefs. Canada further denies that the class is ordinarily or frequently subjected to battery or excessive use of force by the RCMP, while under arrest, detention or custody.

23. Rather, in the vast majority of RCMP contacts with persons, including Indigenous persons in the Territories, RCMP officers carried out their public duties without using force. Further, in those few instances in which RCMP officers used force, the force used was almost always no more than that reasonably required for the RCMP officers to carry out their public duties. In those very rare instances in which an officer may have used excessive force, the funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories did not cause that excessive use of force.

24. In response to paragraph 24 of the Claim, Canada denies that arrest and detention of individual persons were systemic and puts the plaintiff to the strict proof of this assertion.

25. In response to paragraph 25 of the Claim, Canada denies that the RCMP employed discriminatory practices against Indigenous persons, or that the Crown had knowledge of it.

26. Canada denies paragraph 26 of the Claim and states that the Government of Canada partnered with law enforcement agencies, including the RCMP, to support and develop a “Law Enforcement Aboriginal and Diversity Network”, a good faith effort to encourage multicultural groups, Indigenous communities, and police services to build strong relationships and make communities more safe and secure.

27. Canada denies the allegations in paragraph 31 of the Claim and states that the RCMP funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories have evolved through the years, in response to greater knowledge respecting policing, including the use of force, and the availability of funding.

28. In response to Commissioner Paulson’s statement described in paragraph 27 of the Claim, Commissioner Paulson did state there were racist officers in the RCMP; he also said that he did not want them there. In the same statement, he encouraged Indigenous leaders and individuals to bring forward complaints respecting racist officers and referred to processes in place to respond to such complaints.

29. Canada has no knowledge of the allegations in paragraph 29 of the Claim.

The Representative Plaintiff

30. In response to paragraphs 33, 36, and 37 of the Claim, Canada admits that the plaintiff was detained by RCMP Officers in the Northwest Territories on November 4, 2017, but denies that he was subjected to battery, excessive force, or discrimination.

31. In further response to paragraphs 34 to 38 of the Claim, Canada states:

- a) On November 4, 2017, RCMP members observed three snowmobiles being operated near Tuktoyaktok, Northwest Territories and effected a traffic stop. One of the drivers was later identified as the plaintiff. Canada has no knowledge of whether the other individuals operating the snowmobiles were Indigenous persons.

- b) The plaintiff's Indigeneity was not known to the officers at the time of the traffic stop. His face was covered. The RCMP members asked the plaintiff, as the driver of a snowmobile, several times to identify himself, as required by law. He refused.
- c) One of the RCMP members placed his hand on the windshield of the snowmobile driven by the plaintiff. The plaintiff held the member's arm and jacket, attempting to remove the member's hand from the snowmobile.
- d) An RCMP member advised the plaintiff that he was under arrest for assaulting a police officer and to let go of his arm. The plaintiff refused to let go of the RCMP member, who took hold of the plaintiff's wrist and removed him from the snowmobile. The plaintiff landed on the ground. The two RCMP members attempted to handcuff the plaintiff, who resisted. The plaintiff punched an RCMP member in the face during the struggle.
- e) After the plaintiff was handcuffed, RCMP members walked him to their police vehicle. The plaintiff continued to resist and kicked one of the arresting officers in the leg. Once he was in the back seat of the police vehicle, RCMP members were able to identify the plaintiff and transported him to the Tuktoyaktuk RCMP detachment. The plaintiff was charged with one count of obstructing justice, and two counts of assaulting a police officer. He was released a short time later.
- f) Canada denies that the RCMP members beat, choked, punched, tasered, or used any weapon to constrain or control the plaintiff. Canada further denies that the RCMP members made statements referencing the plaintiff's race or used language meant to demean the plaintiff's Indigenous ancestry.

32. Canada denies that the plaintiff's interaction with individual RCMP officers was caused by the asserted negligence in RCMP funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories. In any event, the plaintiff has pleaded no material facts in support of this allegation.

NO PRIVATE LAW DUTY OF CARE

33. Canada states that the Claim respecting funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories does not disclose a reasonable cause of action.

34. In response to paragraph 43 of the Claim, Canada states that the Claim does not plead the requisite facts or particulars of any interaction grounding a proximate relationship between the class and Canada in respect of the asserted duty of care.

35. Canada states that it owes duties to the public, but does not owe a private law duty of care to the plaintiff or the class in respect of the funding, oversight, operation, supervision, control, maintenance and support of RCMP detachments in the Territories at the institutional level.

36. In response to paragraphs 13 and 44 of the Claim, Canada states that RCMP officers have been subject to the Code of Conduct of the Royal Canadian Mounted Police (Code of Conduct), when it was in effect and as it has changed through the class period. Canada states that pursuant to the Code of Conduct, officers are to respect the rights of every person and not engage in discrimination. The Code of Conduct also requires officers to be diligent in the performance of their duties, which includes preventing and investigating crime, preserving the peace, enforcing laws, apprehending criminals and offenders and others who may lawfully be taken into custody, executing warrants, and duties and services related to warrants. Canada further states that the RCMP duties set out in legislation from time to time are duties to the public which do not give rise to a private law duty of care to the class in funding, oversight, operation, supervision, control, maintenance and support of RCMP detachments in the Territories.

37. Canada specifically denies that any of

- a) the Police Services Agreements referred to in paragraph 45 of the Claim;
- b) the provisions of the *Criminal Code* described in paragraph 46 of the Claim;
- c) the RCMP's operation of RCMP detachments in the Territories referred to in paragraph 47 of the Claim;
- d) the provisions in the *Royal Canadian Mounted Police Regulations*, 1988, SOR/88-361; or
- e) any of the other bases listed in the Claim, including paragraphs 48 to 50

give rise to proximity between the class and Canada which would result in the alleged common, private law duty of care owed to the class.

38. In the alternative, Canada's funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories are core policy decisions which negate any *prima facie* duty of care. Policy immunity applies to courses or principles of action based on public policy considerations.

39. In specific response to paragraphs 49 and 61 of the Claim, Canada and the RCMP did not know, nor ought to have known, that Canada's funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories could or would result in compensable physical or emotional harm to the class, as alleged. Rather, whether a class member experienced battery as defined by law, or the use of force, whether reasonable or excessive, or the other wrongs asserted in this claim, depended on the circumstances of that class member's interaction with the RCMP, not Canada's funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories.

CANADA MET THE APPLICABLE STANDARD OF CARE

40. Canada pleads and relies on s. 3(b)(i) of the *Crown Liability and Proceedings Act*, RSC 1985 c C-50 with respect to the allegations of direct negligence. Under this provision, Canada is only vicariously liable in negligence and will only be liable in negligence where a federal Crown servant was negligent.

41. Canada states that the plaintiff has not pled any or sufficient material facts to support a finding of direct or systemic negligence.

42. Canada states that it should not be held to present day standards of care and standards throughout the 90-year class period. Policing standards have evolved over the course of this time. If Canada or its servants owed the alleged common private duty of care to the class, which is denied, Canada states that during the funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories, Canada and its servants acted

with due care, and met the standard of care of the day, pursuant to the policies, programs, procedures and practices applicable at the relevant time.

43. In response to paragraph 50 and 51 of the Claim, Canada specifically denies that RCMP detachments in the Territories were operated substantially dissimilarly from RCMP detachments in communities of similar size and remoteness outside of the Territories, or that RCMP members treated the class dissimilarly to non-Indigenous persons while detained or in custody during the class period.

44. Intervention options involving the use of force are sometimes necessary for police officers to effectively carry out their public duties, including the apprehension and detention of individuals suspected of committing criminal offences. At all relevant times, the use of force model adopted by the RCMP was reasonable and acceptable. This model has been regularly reviewed and updated through the years.

45. Canada specifically relies on section 25 of the *Criminal Code*.

46. At all relevant times, the RCMP has implemented, reviewed, and updated policies pertaining to the use of force and to discrimination-free policing in good faith and responding to changes in knowledge, which met the standards of the day.

47. In specific response to paragraph 52 and 60 of the Claim, Canada denies that Canada breached the duty of care asserted. Canada states that

- a) Reasonable RCMP policies and procedures respecting the use of force were in place at all relevant times;
- b) RCMP policies and procedures did not differentiate between the use of force on Indigenous and non-Indigenous persons;
- c) These policies were reasonably reviewed and updated throughout the class period;
- d) RCMP officers were reasonably educated, trained, and supervised respecting the use of force, particulars of which will be shown at the trial of this action;
- e) In particular, RCMP officer training included training on the Incident Management Intervention Model, a widely accepted use of force model;
- f) RCMP officers received reasonable in-service training on a regular basis respecting the use of force, particulars to be shown at the trial of this action;

- g) RCMP records were reasonably maintained in accordance with the law and RCMP policy; and
- h) Reasonable policies were in place at all relevant times respecting obtaining medical care, in accordance with reasonable police practice at the relevant times.

48. In further response to paragraphs 52 and 60, the plaintiff has provided no particulars of how Canada should have cared for the class, what appropriate policies and procedures should have been implemented, what standards and systems should have been implemented, how RCMP officers should have been supervised or trained, or how records should have been maintained.

49. In accordance with the standards of the time, there were reasonable processes in place by which the RCMP investigated the alleged improper use of force by its members, including investigations in response to complaints, and a complaints process to the Civilian Review and Complaints Commission.

50. RCMP policy required oversight of officer actions in accordance with the standards of the relevant times. Since 2010, RCMP has required investigation by an external police force or independent civilian investigative body in circumstances where:

- a) a serious injury or death occurred in which an RCMP officer was involved; or
- b) an RCMP officer may have contravened the *Criminal Code* (which would include the use of excessive force).

NO FIDUCIARY DUTY OWED

51. The assertions in paragraphs 53 – 59 and throughout the Claim that Canada breached a fiduciary duty to the class do not disclose a reasonable cause of action. The Federal Court of Appeal struck the class's claim of breach of fiduciary duty.

NO CAUSATION

52. In response to paragraphs 39 and 41 of the Claim, if the plaintiff suffered any injury or damages (which is denied), that injury or damage did not result from the funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories, but rather from the individual circumstances of his interaction with the police.

53. Canada denies that its funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories caused common or any damages to the class. Further, any negligence in funding, oversight, operation, supervision, control, maintenance and support is of no legal consequence absent the use of excessive force during a particular interaction.

54. Alternatively, the funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories is too remote to be causally connected to an RCMP officer's alleged use of excessive force on an individual. Whether an RCMP officer used excessive force on a member of the class does not depend upon RCMP funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories, but rather upon the individual circumstances surrounding that specific use of force.

55. Canada states that policing inevitably involves the use of force in some circumstances, to prevent offences, to protect the public, those subjected to crime and the police themselves from further harm, and to detain and arrest persons in accordance with the law.

NO BREACH OF CHARTER RIGHTS

56. In response to the assertions in paragraphs 62–70 of the Claim, Canada denies the *Charter* rights of the representative plaintiff or the class pursuant to section 7 or 15 have been violated. Aggregate generic statements of asserted misconduct by unidentified RCMP officers and/or Canada are insufficient to ground a *Charter* breach based on RCMP funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories common to the class, or at all.

57. The RCMP has a policy on bias-free policing. RCMP cadets receive training on concepts such as diversity, prejudice, discrimination, ethics, the *Charter*, Canadian human rights history and bias.

58. In response to paragraph 71 of the Claim and in the alternative, section 1 of the *Charter* is not relevant to this matter, because RCMP funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories did not breach the *Charter*.

DAMAGES

59. In response to paragraphs 72-75 of the Claim, Canada denies that its actions were as described therein. Accordingly, Canada states that the circumstances do not give rise to liability for damages as asserted or at all.

60. In response to paragraphs 39, 41, and 72-75 of the Claim, Canada denies that the representative plaintiff or the class suffered common or individual injury, loss, and damages as alleged in the Claim, or at all.

61. Alternatively, if the plaintiff or the class did suffer injury, loss, or damage as asserted in the Claim, or at all, which is denied,

- a) the injury, loss, or damage was not caused by any act or omission of Canada;
- b) the injury, loss, or damage was remote or unforeseeable;
- c) the injury was not an injury common to the class; and
- d) the representative plaintiff and the class failed to mitigate the injury, loss, or damage adequately, or at all.

62. In response to paragraph 72 and 75-77 of the Claim concerning *Charter* damages:

- a) The claim for *Charter* damages is premised on particular *Charter* violations in individual circumstances, which cannot reasonably be assessed in common or in a factual vacuum based on a series of generalized allegations of misconduct;
- b) An award of aggregate *Charter* damages to the class would not be appropriate and just in the circumstances of this case, as it would not serve the objectives of compensation, vindication and deterrence, and would be inappropriate based on countervailing factors; and
- c) Alternatively, an award of *Charter* damages would be duplicative and amount to double recovery of any damages in tort.

63. In response to paragraphs 78-79 of the Claim, Canada denies that its actions in funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the

Territories were as described therein. At all times, Canada and the RCMP acted reasonably and in good faith in funding, oversight, operation, supervision, control, maintenance, and support of RCMP detachments in the Territories. Accordingly, Canada states that the circumstances do not give rise to liability for punitive or exemplary damages as asserted or at all.

LIMITATIONS AND OTHER RESTRICTIONS ON THE TEMPORAL SCOPE OF THE CLAIM

64. Canada states that due to the passage of time, the evolving standards of care over the 90-year Class Period, the lack of contemporaneous records and the insufficient particulars of the assertions, it is unable to adequately respond to claims advanced by the plaintiff.

65. Canada pleads and relies upon the two-year limitation period set out in the *Limitation of Actions Act*, RSNWT 1988, c L-8, the *Limitation of Actions Act*, RSY 2002, c 139 and the *Limitation of Actions Act, RSNWT (Nu)* 1988, c L-8, as applicable.

66. Alternatively and pursuant to section 32 of the *CLPA*, Canada pleads and relies upon the six-year limitation period set out therein, as the asserted causes of action arose otherwise than in a province.

67. In the further alternative, Canada is unable to provide a full and effective defence to the plaintiff's claims, which are alleged to have commenced in 1928, as evidence and witnesses are no longer available. The passage of time from the alleged wrongful acts to the filing of the statement of claim creates an unfairness and as such, Canada relies upon the equitable doctrines of laches and acquiescence and upon the *Crown Liability and Proceedings Act*, R.S.C. 1985, Ch. C-50 and the *Crown Liability Act*, S.C. 1952-53, c.30.

68. In the further alternative and in response to subparagraphs 1(d), (f), (g) and 80(b) and paragraphs 62-72, 75, and 76 of the Claim, and the Claim as a whole, all claims respecting asserted breaches of the *Charter* (except section 15) are necessarily limited to the asserted acts or omissions of Canada or its servants arising on or after April 17, 1982. All claims respecting asserted breaches of section 15 of the *Charter* are necessarily limited to the asserted acts or omissions of Canada or its servants arising on or after April 17, 1985.

69. Further, Canada cannot be found liable in respect of any asserted wrongful conduct of Crown servants prior to May 14, 1953, being the date of the coming into force of the *Crown Liability Act*, SC 1953, c 30, which claims are barred by the transitional provisions in section 24 therein.

70. Canada relies upon the provisions of: the *CLPA*; the *RCMP Act*; the *Royal Canadian Mounted Police Regulations*, SOR/2014-281; the *Contributory Negligence Act*, RSNWT 1988, c C-18, as amended, and equivalent or comparable legislation in other territories as amended; the *Limitation of Actions Act*, RSNWT 1988, c L-8, the *Limitation of Actions Act*, RSY 2002, c 139 and the *Limitation of Actions Act*, RSNWT (Nu) 1988, c L-8, and section 25 of the *Criminal Code*.

NO PREJUDGMENT INTEREST

71. Canada states that the class is not entitled to prejudgment interest based on the failure to adequately particularize the basis for the damages claimed.

72. In the alternative, if the class is entitled to prejudgment interest, which is not admitted, such interest may only be awarded starting from February 1, 1992, in accordance with section 36(6) of the *Federal Courts Act*, R.S.C. 1985, c.F-7, and section 31(6) of the *Crown Liability and Proceedings Act*, R.S.C. 1985, c.C-30.

GENERAL

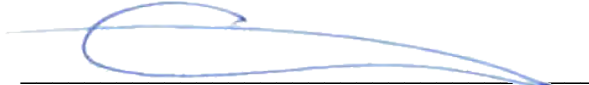
73. Canada does not agree that the trial of this matter should be in Toronto. Canada proposes that the trial of this matter should be in Edmonton, Alberta.

RELIEF SOUGHT

74. Canada is not liable for any damages as asserted, nor is the class entitled to the declaratory relief sought.

75. Canada respectfully requests that the Claim be dismissed.

Date: July 8, 2024



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