



No. S097767
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF:

THE CONSTITUTIONAL QUESTION ACT, R.S.B.C. 1996, C. 68

AND IN THE MATTER OF:

THE CANADIAN CHARTER OF RIGHTS AND FREEDOMS

AND IN THE MATTER OF:

A REFERENCE BY THE LIEUTENANT GOVERNOR IN COUNCIL
SET OUT IN ORDER IN COUNCIL NO. 553 DATED OCTOBER 22, 2009
CONCERNING THE CONSTITUTIONALITY OF S. 293 OF
THE CRIMINAL CODE OF CANADA, R.S.C., 1985, C. C-46

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1. Canada disagrees with much of what is said in the closing submissions of the Amicus and the other Challengers, including their treatment of the evidence. The Amicus and the other Challengers have ignored compelling evidence of the harms of polygamy or have asked this Court to reject that evidence without providing any real basis to do so.
2. Canada has already addressed in its closing submissions most of the arguments raised by the Challengers in their submissions. Canada will further respond to the Challengers' closing submissions and their treatment of the evidence during oral submissions.
3. Canada adopts BC's reply submission that "consent" to engage in a criminal activity is not, and should not be, a principle of fundamental justice.
4. Canada adopts BC's reply submission that polygamy is not properly characterized as an analogous ground under s. 15 of the Charter.

All of which is respectfully submitted.

Dated at Vancouver, British Columbia, March 25, 2011.



R. Keith Reimer
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