SCC FILE NUMBER: 38727

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

BETWEEN:

MYRIAM MICHAIL

APPLICANT

— and —

ONTARIO ENGLISH CATHOLIC TEACHERS' ASSOCIATION, MARSHALL JARVIS, BRUNO MUZZI, FERN HOGAN, JOANNE SCHLEEN, SHELLEY MALONE, SHEILA BRESCIA;
LONDON DISTRICT CATHOLIC SCHOOL BOARD AND
ONTARIO LABOUR RELATIONS BOARD

RESPONDENTS

ATTORNEY GENERAL OF CANADA and
ATTORNEY GENERAL OF ONTARIO

RESPONDENTS

APPLICANT'S REPLY
TO ATTORNEY GENERAL OF ONTARIO
And
TO ATTORNEY GENERAL OF CANADA

Filed by Myriam Michail
Self-Represented Applicant

September 3, 2019

MYRIAM MICHAIL
[redacted]
Self-Represented Applicant

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APPLICANT'S REPLY TO ATTORNEYS GENERAL RESPONSES

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REPLY TO ATTORNEY GENERAL OF ONTARIO
Filed by Myriam Michail September 3, 2019
Self-Represented Applicant

ORIGINAL TO: THE REGISTRAR

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REPLY TO ATTORNEY GENERAL OF ONTARIO MEMORANDUM OF ARGUMENT

1. The Attorney General of Ontario's ("AGO") response is inaccurate, incomplete and misleading.

2. The AGO's request to have my Application for leave dismissed is done in bad faith in order to avoid the litigation of a legitimate constitutional challenge of major public interest and national importance but would expose the AGO's failure to uphold the rule of law and their breach of the public trust; therefore the AGO's Reply should be disregarded.

3. It is necessary for this Court to hear and address the merits of this appeal, as the public and national importance of this matter cannot be overlooked.

4. The integrity of our legal system, the supremacy of our constitution, the constitutional principle of open justice, the rule of law, the litigant's constitutional legal rights, their right to freedom of expression, and the right to gather evidence in an open and fair process, equality before the law, the liberty and security of the person, and the public's right to see justice being done, are at the forefront of the Application.

5. I am challenging the constitutionality of subsections 136(1)(a) (i), (b), (c) as well as the punishment under ss.136 (4) of the CJA prohibiting audio and video recordings in Appellate Courts, the Superior Court of Justice, and the Ontario Courts of Justice (for applications and motions), where there is no jury, no witnesses, and no publication bans in place creating an oppressive environment which should be alien to a free and democratic nation.

6. I am also challenging the constitutionality of the culture of covertness by establishing that the constitutional principal of open justice includes the disclosure of unredacted transcripts, dissemination of audio and video recordings of proceedings (where applicable), and the disclosure and the publications of all decisions.

7. The majority of the AGO's Reply consists of an inaccurate summary of the case which does not provide any context to the present Application before the Court. The AGO also conceals all facts regarding the abuse of process, obstruction of justice and the miscarriage of justice that I have endured.

8. The AGO also fails to provide any reasons as to why cameras in Ontario Appellate courtrooms are of no public interest and remain prohibited.

9. In their Reply the AGO claims that I am making *"unsubstantiated and unsupported allegations of bad faith against Ontario and various judicial actors*". Yet, the AGO fails to provide a single example of where any claim I have made was not substantiated and/or which "allegations" are unsupported by evidence.

10. This conduct amounts to a malicious attack on my integrity and should not go unchallenged. I am mindful of the seriousness of my allegations and I do not make them lightly. I would not bring forth allegations of bad faith, breach of public trust and failure to fulfill their mandate without numerous concrete evidences.

11. Therefore, this statement by the AGO should carry no weight and should be disregard. There were numerous dilatory and unlawful tactics used to deny me access to justice as evident in my correspondence with Chief Justice George Strathy[1] which remained unaddressed.

12. As a matter of fact, Feldman, Pardu and Roberts JJ.A. in their October 25, 2018 decision, 2018 ONCA 857[2] at paragraph [3] acknowledge the presence *of "a number of administrative problems at the court office since the order of Grace J., resulting in problems with the Divisional Court file for her judicial review application in both the London office, and in the Hamilton office where another file was commenced.*".

13. Although I had informed Feldman, Pardu and Roberts JJ.A. that I had called upon the Honourable Regional Senior Judge Harrison Arrell and Administrative Judge Milanetti, for assistance and directions[3] and that Judge Arrell had requested that I cease from writing to him regarding my matter since he has no jurisdiction[4]; they still abdicated their responsibility and wrote at paragraph [9]: "*it is for the Divisional Court and its administration to assist the appellant, a self-represented litigant, to bring forward her judicial review application.*"

14. Nevertheless, after receiving notification from the Divisional Court in Hamilton that my JR application will be dismissed for delay. In a state of despair, I, one more time, called upon RSJ Arrell on May 1st, 2019[5], to assist me as per Feldman, Pardu and Roberts JJ.A. directions.

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[1] Correspondence with Chief Justice Strathy and ACJ Hoy of February 8 & 25, 2019 **Tab 13**
[2] See Memorandum for leave to Appeal **Tab 2 (E) p. 27**
[3] See Letter to RSJ Arrell and Administrative Judge Milanetti of May 9, 2018 **Tab 15 p.**
[4] Correspondence from RSJ Arrell **Tab 14**
[5] Correspondence to RSJ Arrell and Administrative Judge Milanetti May 1st, 2019 **Tab 15**

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15. My letter remains unanswered. I have neither heard from the Divisional Court regarding the status of my file, nor from RSJ Arrell who had informed me that he will no longer answer my letters[6]. I am left in limbo, without recourse in a serious miscarriage of justice.

16. The AGO does not bring any original arguments as to why this Application should not be heard. The AGO is simply repeating controversial statements made by Rouleau, Miller, and Fairburn JJ.A verbatim. These statements constitute an attack on the rule of law, and set a dangerous precedent that should not be allowed to stand in our democracy. I am challenging their constitutionality and/or legality as reported in my Memorandum for leave to appeal paragraphs 74 to 82 and 105 to 112.

17. The AGO does not provide any explanation for their failure to amend this impugned provision, despite the 2008[7] Report expressing the public's outcry that "*The Courts of Justice Act should be amended to permit cameras for proceedings in the Court of Appeal and Divisional Court*".

18. Had the AGOs fulfilled their mandate as guardians of the public interests, I would not have found myself in the position I am in now. At the Superior Court, the judges refused to allow me access to transcripts of my own hearings and at the COA,* I am unable to obtain any audio material or transcripts relating to my hearing without being faced with an oppressive undertaking, assaulting my constitutional rights under s. 2(b), 7, and 12 of the *Charter*. It is grossly unfair to require litigants to mount a constitutional challenge to a law the government is well aware of its unconstitutionality and its oppressive and detrimental impact on Canadians.

19. For the AGO to advocate that my Application be dismissed, knowing that I am bringing forward legitimate arguments supported by comprehensive evidence and a crucial report that the Ministry of Justice concealed since its publication in 2008[8], and can only be accessed by filing a Freedom of Information Act request, is prima facie evidence of bad faith, an unwillingness to advocate for the people of Ontario and a failure to uphold the rule of law.

20. It is absurd and irrational that the COA claims it lacks jurisdiction to address the constitutional challenge that stems from their own rules. Meanwhile, by the COA's own admission, the COA

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[6] See correspondence from RSJ Arrell of March 12 and March 28, 2018 **Tab 14**
[7] See Memorandum **tab 4 (Q)**
[8] Ibid
* See Tab 6

is the appropriate forum to hear a motion requesting the right to disseminate audio recording of my hearings at the COA, and the publication of decisions issued by judges of the COA.

21. It is irrational that Rouleau, Miller, and Fairburn JJ.A state *"we agree with Ms. Michail that the motion judge in fact had jurisdiction to decide her motion*[9]"; and simultaneously rule that "*A constitutional challenge to a statute cannot be brought in this court in the absence of a valid appeal.*". The COA cannot have it both ways, only to then make the decision to dismiss my constitutional challenge based on this false contention.

22. My motion was duly before the Court of Appeal. The original motion M49750 (Brown J.A. decision) requesting the audio recording of my hearings was filed in compliance with rule 17. 2, 3 and 4 of *the Practice Direction Concerning Civil Appeals at the COA for Ontario*[10].

23. In *Pintea v. Johns*, 2017 SCC 23, the Supreme Court of Canada unanimously endorsed the Statement of Principles established by the Canadian Judicial Council which promote "*rights of access to justice for those who represent themselves requires that all aspects of the court process be open, transparent, clearly defined, simple, convenient and accommodating.*" Yet, the Attorneys General of Ontario, and Canada, as well as the three Respondents, with the support of some COA employees, relentlessly attempted to prohibit me from filing my motion to appeal Brown's J.A decision. They ultimately filed a vexatious request based on false contentions under Rule 2.1 of the *Rules of Civil Procedures* to label me a vexatious litigant[11]. Although this request was rejected, it indeed caused me extreme distress.

24. By granting leave for this Application, the Court will be provided with *factual foundation of fundamental importance to the arguments* that would otherwise not be available. This constitutional challenge is based upon evidence of *the deleterious effects* of this impugned legislation on litigants which will provide objective arguments to the court.

25. In *Danson v. Ontario (Attorney General),* [1990] 2 SCR 1086, Sopinka J. writes:

> 30 .... Cory J., speaking for a unanimous Court, stated [S.C.R. at pp. 361-362]:
>
> Charter decisions should not and must not be made in a factual vacuum. To attempt to do so would trivialize the Charter and inevitably result in ill-considered opinions. The presentation of facts is not, as stated by the respondent, a mere technicality; rather, it

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[9] Memorandum for Leave to Appeal **Tab 1(H)** Michail v. OECTA , 2019 ONCA 319 para. 6 and 23.
[10] See Practice Direction Concerning Civil Appeals at the COA for Ontario **Tab 7**
[11] See 2.1 request **Tab 9**

> is essential to a proper consideration of Charter issues. … Charter decisions cannot be based upon the unsupported hypotheses of enthusiastic counsel.

Later, Cory J. stated [at p. 366]:

> A factual foundation is of fundamental importance on this appeal. It is not the purpose of the legislation which is said to infringe the Charter but its effects. If the deleterious effects are not established there can be no Charter violation and no case has been made out. Thus, the absence of a factual base is not just a technicality that could be overlooked, but rather it is a flaw that is fatal to the appellants' position.

26. These issues arose first at the Superior Court in London[12] then again at the COA when I was denied transcripts, audio and video recordings of my hearings at the COA. The denial of my request sets course for this process. In *Toronto Star Newspapers Ltd. v. Canada*, [2010] 1 SCR 721, 2010 SCC 21:

> [3] Context is the key to understanding the scope and impact of a limit on a Charter right.

27. Litigants should not continue to be deprived of multiple constitutional rights. This speaks directly to the AGO's failure to fulfill his mandate to uphold the spirit and intent of the law and justice to all Ontarians.

28. Last but not least, the AGO's conduct during litigation at the COA was vexatious. The AGO has shown contempt to the rule of law and the integrity of the process. The AGO was all along adamant that they should not be named as Respondents and colluded with the Respondents to have my appeal rejected[13]. At the October 18, 2018 hearing, Ms. Ranalli acted improperly and was reprimanded by Feldman J.A.

29. **N.B.** I continue to work diligently to complete my Application for leave to Appeal addressing the unjust quashing of my Appeal 65674, and the Constitutional Challenge to Labour Law provisions that the Superior Court and the COA refused to address, leaving all unionized workers in Canada deprived of their legal rights and under the yoke of a cabal of union officials who have the power to act as legal guardians for millions of workers without accountability.

ALL OF WHICH IS RESPECTFULLY SUBMITTED, this 3rd day of September 2019.

[redacted]
Myriam Michail
Self –Represented Litigant

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[12] See emails from Grace J. and Leitch J. **Tab 6**
[13] See email exchange with AGO (Ms. Ranalli) **Tab 10**

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REPLY TO ATTORNEY GENERAL OF CANADA MEMORANDUM OF ARGUMENT

1. The Attorney General of Canada's ("AGC") submission is inaccurate, incomplete and misleading.

2. The AGC is certainly not "*a stranger to this litigation*" as falsely claimed in their letter addressed to Mr. Bilodeau, dated August 21, 2017 (sic).

3. The AGC was an active party in the original Motion M49750. In fact, Brown J.A. writes in his decision, 2018 ONCA 950 of November 23, 2018[1] at paragraph 2:

> [2] The respondents take no position on her motion. The Attorney General of Ontario and Department of Justice Canada take the position that Ms. Michail's motion is not properly before the court and that her Notice of Constitutional Question in respect of s. 136 of the Courts of Justice Act is a nullity. [Emphasis added]

4. Brown J.A, in his decision, listed the AGC as a party in the title of the proceeding: "*Jacob Pollice, for the responding party, the Department of Justice Canada*"[2].

5. The AGC makes no reference to the serious issues of public and national importance that are raised in the Application, and is relying solely on misleading statements that they continue to make without any substantiation.

6. I was dismayed when I received Mr. Pollice's letter to the COA's registrar, dated November 9, 2018[3], asking the court to prohibit me from filing the motion to obtain audio recordings and transcripts, relying on an unsubstantiated argument claiming that I am at the wrong court.

7. The AGC writes in his Reply to the SCC:

> Ms. Michail is attempting to compel the AGC to participate in litigation in which he has no interest. Ms. Michail continued insistence on naming the AGC appears to stem her belief (sic) that the Constitutional question which she wishes to raise is of such importance that the participation of the AGC is mandatory."

8. If Mr. Pollice would like to falsely claim that the AGC is "*stranger*" to the litigation, and that he has no interest in the matter, then why did he correspond with the COA, making judgements on my motion, and directing the court to prohibit me from filing my appeal? Why was he

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[1] See Memorandum for leave to Appeal **Tab 2 (F)**

[2] Ibid

[3] See attached November 9, 2018 letter and my response **Tab 10**

adamant to see this Constitutional Challenge buried? Is the AGC above the law and entitled to have it both ways, to act in a duplicitous manner and obstruct justice?

9. There have been numerous instances where Mr. Pollice has personally pressured me to remove the AGC as a Respondent. As early as August 15, 2018, Mr. Pollice has inappropriately corresponded with me using these pressure tactics, as he stated "*Please confirm that you will abandon your request to have the Attorney General of Canada added as a party at the earliest convenience*".[4]

10. When I refused to fulfill his wish, Mr. Pollice used intimidation tactics and instilled fear in me by threatening me with further litigation and legal costs, stating: "*If you wish to pursue adding the Attorney General of Canada as a party, I will be opposing the motion and will seek costs*".

11. This form of correspondence continued, although I repeatedly made it clear to Mr. Pollice that I am holding the AGC responsible due to their failure to fulfill their mandate, and for turning a blind eye to corruption. Mr. Pollice then continued to bully me by making condescending comments. On September 7, 2018[5] he wrote to me:

> I wanted to email you first to give you a heads up in the event that you wanted to also write to the Court and confirm for them that the Attorney General of Canada was named in error due to your misunderstanding as to the operation of section 109 of the Courts of Justice Act.

12. I immediately responded, again confirming that I did not list the AGC as a Respondent in error, and that I was holding the AGC accountable for the miscarriage of justice and abuse that I was subjected to in the Courts.

13. Furthermore, I inadvertently received an email, in which Mr. Pollice instigates the Respondents to file a r. 2.1 request to have my *"latest appeal summarily dismissed*". Again, if Mr. Pollice is claiming he is "*stranger*" to this litigation, why did he attempt to direct the litigation behind the scenes by colluding with the other Respondents? Again, this blatant attempt to obstruct justice cannot go uninvestigated, and Mr. Pollice has yet to offer an explanation for this form of manipulation. His email to the Respondents of September 30, 2018[6] reads:

> I wanted to touch base with you all about whether anyone has considered a Rule 2.1 request to have this latest appeal summarily dismissed. The status of the AGC in this

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[4] See email **Tab 11**

[5] Ibid

[6] See email to Respondents **Tab 8**

litigation is questionable and I think that the request is best brought by a party who, if the Court requests submissions, can speak to the entire procedural history. Any thoughts?

14. It was then on January 2, 2019, that Ms. Traynor, lawyer for the LDCSB, obliged to Mr. Pollice wishes and advanced a request on behalf of the Respondents to have the appeal dismissed in the form of a r. 2.1 request[7].

15. This request was ultimately rejected by the court with an appreciation and thank you note and No one was ever held accountable[8].

16. The toll that this vexatious conduct took on my mental and physical health was very damaging. Having to address these vexatious claims, while knowing that it had been orchestrated maliciously between all the parties, spearheaded by Mr. Pollice, caused me extreme distress.

17. **Duplicity**: The AGC cannot have it both ways. The AGC cannot claim to be "*stranger*" to a litigation, while simultaneously taking an active part to influence the litigation overtly and covertly. The AGC took a position on the litigation of motion M49750 and acted on that interest, while claiming having no vested interest in the outcome.

18. For Mr. Pollice to claim that the AGC is "*stranger*" to this litigation, but then spend copious amounts of time trying to derail and direct the litigation shows that he is acting maliciously and in bad faith. It is disturbing how the AGC shows such contempt to the integrity of a judicial process and feels at liberty to act capriciously, moving between being an active party in this litigation in some instances and to go dormant and claim being a "stranger" in others.

19. Furthermore, it is my position that this type of behaviour constitute an attempt to obstruct justice, especially considering the severe power imbalance between an SRL with a disability and the AGC and the public interests and high level of importance of the matter subject of this litigation.

20. Ironically, at the COA, the AGO had made the same claim all along. At the October 18,2018 hearing, Ms. Ranalli was adamant that the Attorney General of Ontario should not be named as a Respondent; however, it appears that they are abandoning this claim for the time being[9].

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[7] See r.2.1 request **Tab 9**

[8] See Letter from Mr. Marentic **Tab 9 p.**

[9] See email exchange with AGO (Ms. Ranalli) re. their status in litigation **Tab 10**

21. I respectfully submit that this conduct should be addressed by this Court. I am calling upon this Court, as Canadians' last hope and recourse, to intervene and review these tactics employed by the Respondents.

22. I am calling upon this Court to dismiss the false arguments provided by the AGC, and to recognize that the AGC is indeed not a "*stranger*" to this litigation but an active party in this litigation, who failed to ensure the integrity of our Courts.

23. My position remains the same as repeatedly conveyed to Mr. Pollice in my emails to him i.e.:

- What goes on in the courts is at the heart of her mandate. …
  Furthermore, the lack of transparency and openness of our courts is a major factor that is contributing to the current dysfunctional state of many of our courts.
- It is sad that you have quickly chosen to threaten me with cost if I don't abandon my request to add the Attorney General of Canada as a Respondent.

  "Legal costs" is clearly becoming a tactic used to deter and silence honest victims from seeking justice. I am threatened with substantive cost if I continue to pursue my allegations of fraud. (…)

  I was yelled at and abused by several court clerks including Ms. Gillian Zegers, who threatened me with police and I was escorted by guards out of the Court house for politely stating the truth that I didn't open a court file, did not file the impugned application and did not enter the 3 sets of 11 volumes in this file on January 29, 2018.

  I have reported the incident, I sent a complaint to all stakeholders including the Attorney General of Canada, that I have been subjected to serious harassment and abuse at the Court in London at no point has anyone looked at the matter or even offered an apology.

  If you wish to request cost, that's your prerogative.

  I am reminding you that your mandate is to protect public interest and access to justice. We have entrusted you to be the Guardians of public interest.

24. I even wrote to the COA on September 13, 2018[10]:

> As for the matter of the Attorney General, I have clearly stated to Mr. Pollice that I am naming the Attorney General of Canada and Ontario as Respondent in the Appeal not just the Constitutional challenge. I wrote to him on September 7, 2018:
>
> > The Attorney General of Canada is <u>not</u> named in error in the Appeal and is <u>not</u> limited to the Constitutional challenge. [emphasis in the original email]
> >
> > As previously explained to you, I do hold the Attorney General accountable for the current miscarriage of justice and the mistreatment and abuse I was subjected to at the Superior Court in London.

[10] See Letter to COA Registrar Mr. Marentic dated September 13, 3018 Tab 5

To be clear, I would challenge the AG's decision to refuse to be named as a Respondent in the appeal. As guardian of public interest, it goes to the heart of the AG mandate.

ALL OF WHICH IS RESPECTFULLY SUBMITTED, this 3rd day of September 2019.

[redacted]
Myriam Michail
Self –Represented Litigant