Court File No. T-1146-25

FEDERAL COURT

B E T W E E N:

CANADIAN WOMEN'S SEX-BASED RIGHTS

Plaintiff

and

HIS MAJESTY THE KING

Defendant

AFFIDAVIT OF HEATHER MASON

I, Heather Mason, of the [redacted] AFFIRM THAT:

Introduction

1. I have personal knowledge of the evidence sworn to in this affidavit. Where such knowledge is based on information or belief, I have set out the source of such information or belief and believe it to be true.
2. The plaintiff Canadian Women's Sex-Based Rights ("**CAWSBAR**") was founded in 2019 as an unincorporated association of women who support sex-based rights. I was a founding member and a member of the steering committee.
3. In June of 2024 CAWSBAR was formally incorporated as a non-profit corporation. Attached as **Exhibit "A"** is a copy of CAWSBAR's Certificate of Incorporation. I am one of five listed directors of the corporation. I serve as the Chair of the Board of Directors and have done so since June of 2024.
4. In this affidavit I will outline my own lived experience in the criminal justice system, recount my own advocacy prior to co-founding CAWSBAR and detail CAWSBAR's

work with particular reference to its advocacy for incarcerated women. I will also address CAWSBAR's capacity to bring this claim and my knowledge of whether there is any other viable alternative method of proceeding.

My Lived Experience

5. In addition to my role as CAWSBAR's Chair of its Board of Directors, I have lived experience in the criminal justice system and with many of the issues raised in this action.

6. My involvement in the criminal justice system began in 2014 and ended following my release from custody from the Grand Valley Institution for Women ("**GVI**") in 2018. I was convicted of a number of criminal offences throughout that period, primarily related to the possession of illegal drugs and failing to comply with release documents and probation orders. Attached as **Exhibit "B"** is copy of my Criminal Record provided to me by the Royal Canadian Mounted Police.

7. As noted in my criminal record, I was convicted multiple times between 2014 and 2016. Each respective custodial sentence was less than two years meaning that I served my time in provincial correctional institutions. Following my final conviction in 2017, I received a sentence of 784 days and was therefore transferred to the GVI, which is a federally institution.

8. The driving force behind my involvement in the criminal justice system was my previous fentanyl addiction. I have not consumed fentanyl since the days following my final conviction in 2017. I have remained abstinent from all illegal drugs since that date.

9. I first became aware that male inmates were being transferred to women's correctional facilities in the year 2015 while incarcerated in a provincial jail. While being strip searched, a biological male inmate who identified as a woman was located in the cell next to the cell in which the search was being conducted. As the guards were moving the male inmate, he peeked into my cell to look at me naked. I was shocked and horrified that this was allowed to happen.

10. As mentioned above, my only incarceration in a federal facility (GVI) occurred in 2017-2018, which was around the time that Correctional Service Canada's ("**CSC**") policies began allowing for the transfer of pre-operative trans-identifying male inmates into female institutions. Prior to the passing of Bill C-16, very few trans-identifying male inmates were transferred to women's federal correctional facilities. Those who did were required to undergo surgery to remove their genitals prior to the transfer being authorized.

11. While I was incarcerated at GVI, I was aware of one trans-identifying male who was also serving time at that institution, namely [redacted] would frequently make derogatory comments toward me and other female inmates. I recall that he would frequently say, "I might be a woman from the waist down, but I'll always be a man from the waist up," and, "I'll always think like a man." I also became aware from other inmates that [redacted] had forced himself upon several female inmates and had been sent to segregation as a result. Again, I was shocked and horrified that trans-identified male inmates were able to serve their time in a women's prison.

12. This lived experience in the criminal justice system, and particularly my experience with trans-identified male inmates has motivated me to undertake the activism outlined below and informs, in part, CAWSBAR's focus on advocating for the sex-based rights of incarcerated women.

My Own Advocacy Prior to Founding CAWSBAR

13. Following my release from GVI in 2018, I began volunteer work with the Canadian Association of Elizabeth Fry Societies ("**CAEFS**"). I was motivated to do this volunteer work after CAEFS workers and volunteers supported me in my transition from GVI back into the community. They helped me integrate back into society. I really cared about the organization and believed that they did excellent work advocating for women in custody.

14. My volunteer work included speaking on panel discussions regarding strip searches. I spoke on three such panels. It also included relatively menial tasks such as assisting with bingo fund raisers and manually processing re-occurring credit card payments.

15. My opposition to the transfer of trans-identifying male inmates into female prisons frequently put me at odds with CAEFS staff, volunteers and leadership.

16. This tension ultimately came to a head at the CAEFS' 2019 annual general meeting held May 31 - June 2. At the meeting a formerly incarcerated woman spoke about her experience of being sexually harassed and victimized by a trans-identifying male inmate and CSC's dismissal of her complaints as "bigotry". Rather than being met with support by attendees, she was met with silence. After she left the room in tears the silence was broken by a buzz of comments from conference attendees:

“I'm sorry for what happened to her, but you don't need a vagina to be a woman,” and, “I am concerned about the transphobia in this room.” That day CAEFS adopted a blanket position of “inclusion” that, among other things, meant supporting the transfer of trans-identifying males into women's prisons. A letter documenting these events was eventually sent to the CAEFS Board of Directors on June 2, 2021, signed by 21 formerly incarcerated women including myself. A copy of that letter is attached as **Exhibit “C”**.

17. I ultimately resigned from my volunteer position at CAEFS in November of 2019, in large part due to my disagreement with its policy supporting the transfer of trans-identifying male inmates into women’s prisons.

Overview of CAWSBAR’s Mission and Activities

18. CAWSBAR was founded in December of 2019.

19. Since its founding CAWSBAR’s mission has been to preserve the traditional sex-based rights and protections of women and girls across Canada. CAWSBAR advocates for women’s sex-based rights and protections in the context of venues traditionally reserved for biological females including: homeless shelters and hostels; change rooms/locker rooms; washrooms; rape relief and domestic violence shelters; custodial institutions; sporting divisions; shared rooms in hospitals and university/college dorms; extracurricular groups (e.g. Girl Guides); academic scholarships and grants; positions on committees; conferences, seminars and retreats; lesbian resources and events; housing co-ops; music and art festivals; and university/college women’s centres.

20. CAWSBAR's overall philosophy is summarized in a position statement available on its website: https://www.cawsbar.ca/position-statement. A copy of that position statement is attached as **Exhibit "D"**.

21. CAWSBAR has several thousand supporters across Canada drawn from diverse backgrounds. CAWSBAR actively engages with both its supports, and Canadians at large, as follows:

    a. CAWSBAR publishes a newsletter on its website which has 1158 subscribers.

    b. Since 2024 CAWSBAR has held an annual conference which coincides with International Women's Day. These have been held in Toronto (2024) and Calgary (2025). The 2026 conference will be held in Montreal.

    c. CAWSBAR has an active social media account on "X" [formerly known as twitter] which has 18,000 followers as of the date this affidavit is sworn. We frequently post updates about our activities and news we believe that our followers will be interested in. We hold weekly X "spaces" where members and guests discuss a range of issues relating to our mission.

    d. CAWSBAR has an active social media account on Facebook with 2785 followers as of the date of swearing this affidavit. We frequently post updates about our activities and news we believe that our followers will be interested in.

    e. In addition to myself, CAWSBAR has many spokeswomen who frequently appear on podcasts and in the media to discuss issues related to CAWSBAR's mandate and women's sex-based rights. The past and present spokeswomen are: [redacted] The spokeswomen typically speak about issues

unique to their interests and background. For example, [redacted] is a competitive powerlifter who speaks about fairness in sports. [redacted] is a nurse facing disciplinary proceedings by her professional regulator for her public statements that there are only two genders. She regularly speaks on that issue. My own conduct as a spokeswoman is detailed further below.

22. CAWSBAR also has a network of approximately 200 women whom we term "associates". They have been vetted by CAWSBAR. They provide conceptual input to the organization and receive insider information as to CAWSBAR's activities and advocacy.

23. CAWSBAR is a signatory to the Women's Human Rights Campaign's Declaration on Women's Sex-Based Rights along with over 350 international women's organizations.

24. CAWSBAR has also participated in and supported a number of international actions which align with its mission. These include: "Save Women's Sports" (Atlanta, 2022); "Let Women Speak" (Belfast and Dublin 2023); "Women's Declaration International - USA, Gender Abolition Protest" (Philadelphia, 2023); No Self ID In Germany (German Embassy, Ottawa, 2024); Women's Declaration International - USA, National Convention, (Indianapolis Indiana, September 2025). Participation means sending a representative or in some cases simply lending our name and logo to be used in promotional materials.

<u>CAWSBAR's Advocacy for Female Inmates</u>

25. Since its founding in 2019 CAWSBAR has advocated for the sex-based rights of incarcerated female inmates.

26. We have held regular protests on this issue outside of prisons, courthouses, and parliament. Attached as **Exhibit "E"** is a chart summarizing the numerous protests that we have organized. Attached as **Exhibit "F"** is a picture of our protest outside of Correctional Service Canada's Central Ontario District Women's Supervision Unit in Toronto on October 29, 2025.

27. In addition to the protests, we organized a number of "banner drops" in 2023. The banner drops involve hanging a large banner along a highway overpass with messages like "no males in women's jails." We did this five times including in Toronto (2023); Ottawa (March, 2023); and Calgary (March, June and September, 2023). Attached as **Exhibit "G"** is a picture of our banner drop in Calgary in September 2023.

28. Since 2019 I have regularly appeared on podcasts and news programs on behalf of CAWSBAR to speak about the issue of trans-identified male inmates being transferred to women's prisons and the resulting harms. Attached as **Exhibit "H"** is a chart summarizing these appearances particularizing the host, the video title, and the website URL where the video can be accessed.

29. Since 2019 I have also written regularly on behalf of CAWSBAR about the issue of trans-identified male inmates being transferred to women's prisons and the resulting harms. Attached as **Exhibit "I"** is a chart summarizing my writings.

30. On June 22, 2021, I submitted a written brief to the Standing Committee on Public Safety and National Security of the House of Commons of Canada. Attached as **Exhibit "J"** is a copy of the submitted brief.

31. As a result of CAWSBAR's advocacy and my own lived experience, I am in regular contact with past and present female inmates. I receive an average of one call per week from female inmates who have concerns about the transfer of trans-identified male inmates into their institution. I speak with them about their concerns and possible remedies such as the grievance procedure.

32. In addition to speaking with inmates I have obtained documentary evidence including: documents in the possession of CSC and the Parole Board of Canada via access to information and privacy requests; and conducting a survey of incarcerated women about their interactions with trans-identified male inmates.

Capacity to Bring the Claim

33. CAWSBAR's advocacy and my own lived experience give CAWSBAR a unique set of resources, expertise and ability which will assist us in bringing this claim and seeing it through to completion.

34. I anticipate that we will be able to present to the Court a sufficiently concrete and well-developed factual setting. For example, I have given my legal counsel the contact information of the inmates that I have been in contact with. I understand that they have now taken dozens of statements from female inmates, many of which detail the harms which are alleged in this lawsuit.

35. While CAWSBAR collects donations in support of its work, we do not have the means to commence and maintain a claim of this nature on our own. Nor do I or any of our members have the legal training to argue a case like this in court ourselves. For this reason, I was glad to be put in touch with Charter Advocates

Canada ("**CAC**"), which has agreed to take CAWSBAR on as a client in this matter on a pro bono basis.

36. I have reviewed the Affidavit of Marty Moore submitted in support of CAWSBAR's motion for public interest standing. I am satisfied that with the benefit of assistance and representation from my lawyers at CAC (i.e. Christopher Fleury, James Manson, Allison Pejovic and Darren Leung), CAWSBAR will be able to see this matter to resolution.

No Viable Alternative Method of Proceeding

37. Inmates being held in custody are subject to a number of policies and procedures which limit their ability to interact with other inmates and the outside world more generally. For example, one cannot simply pick up the phone and call an inmate incarcerated at GVI. One must first be put on a call list of approved numbers which involves speaking with a correctional officer at the institution. One must then wait to receive a call from the inmate at the institution. This procedure makes it practically impossible for an individual inmate to have the regular contact with incarcerated inmates from across Canada that I have had over the last 5 years.

38. While an inmate would be able to speak with other inmates within their own institution, they would not have access to inmates in other security classifications. For example, if an inmate was classified as medium security, they would not be able to speak with inmates in maximum security unless or until their security classification was changed.

39. For these reasons, it would be impossible for an incarcerated female inmate to marshal the necessary evidence to bring a lawsuit of this nature.

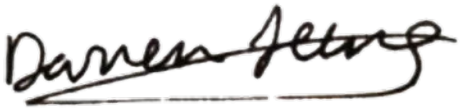
40. In addition, most of the female inmates that I have spoken with have expressed a fear of reprisal from the correctional institution if they were to speak out or even file an institutional grievance. They worry that they will be labelled as discriminatory or a “transphobe” and that speaking out about the issue of sex-based rights may impact their ability to obtain parole when the time comes.

41. While there are other non-profit organizations that have historically advocated on behalf of incarcerated women, these organizations do not take a sex-based rights approach and largely support the transfer of trans-identified male inmates into women’s prisons.

42. As a result of the above, I believe that CAWSBAR is the only viable plaintiff to bring this proceeding and pursue the issues raised in the statement of claim.

43. I am not aware of any other individuals or organizations who have or who are contemplating bringing a similar proceeding.

SWORN REMOTELY by videoconference by)
Heather Mason at the [redacted])
[redacted])
before me at the City of Toronto,)
in the Province of Ontario,)
on the 5th day of December, 2025)
in accordance with O. Reg 431/20.)



DARREN LEUNG
LSO #87938Q
Barrister & Solicitor



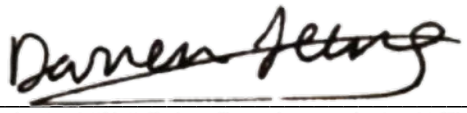
HEATHER MASON

This is Exhibit "**A**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted] [redacted]

[redacted] this 5th day of December, 2025.



A Commissioner etc.

Innovation, Science and Economic Development Canada
Corporations Canada

Innovation, Sciences et Développement économique Canada
Corporations Canada

Certificate of Incorporation

Canada Not-for-profit Corporations Act

Certificat de constitution

Loi canadienne sur les organisations à but non lucratif

Canadian Women's Sex-Based Rights

Corporate name / Dénomination de l'organisation

1612314-7

Corporation number / Numéro de l'organisation

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the *Canada Not-for-profit Corporations Act*.

JE CERTIFIE que l'organisation susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la *Loi canadienne sur les organisations à but non lucratif*.



Hantz Prosper

Director / Directeur

2024-06-13

Date of Incorporation (YYYY-MM-DD)
Date de constitution (AAAA-MM-JJ)

Canada

Innovation, Science and Economic Development Canada
Corporations Canada

Innovation, Sciences et Développement économique Canada
Corporations Canada

Form 4001
Articles of Incorporation
Canada Not-for-profit Corporations Act (NFP Act)

Formulaire 4001
Statuts constitutifs
Loi canadienne sur les organisations à but non lucratif (Loi BNL)

1 Corporate name
Dénomination de l'organisation

Canadian Women's Sex-Based Rights

2 The province or territory in Canada where the registered office is situated
La province ou le territoire au Canada où est maintenu le siège

ON

3 Minimum and maximum number of directors
Nombres minimal et maximal d'administrateurs

Min. 1 Max. 10

4 Statement of the purpose of the corporation
Déclaration d'intention de l'organisation

Our mission is to promote and protect Canadian women's sex-based rights.

5 Restrictions on the activities that the corporation may carry on, if any
Limites imposées aux activités de l'organisation, le cas échéant

None

6 The classes, or regional or other groups, of members that the corporation is authorized to establish
Les catégories, groupes régionaux ou autres groupes de membres que l'organisation est autorisée à établir

See attached schedule / Voir l'annexe ci-jointe

7 Statement regarding the distribution of property remaining on liquidation
Déclaration relative à la répartition du reliquat des biens lors de la liquidation

See attached schedule / Voir l'annexe ci-jointe

8 Additional provisions, if any
Dispositions supplémentaires, le cas échéant

None

9 **Declaration:** I hereby certify that I am an incorporator of the corporation.
Déclaration : J'atteste que je suis un fondateur de l'organisation.

Name(s) - Nom(s)

Heather Mason

Original Signed by - Original signé par

Heather Mason

Heather Mason

A person who makes, or assists in making, a false or misleading statement is guilty of an offence and liable on summary conviction to a fine of not more than $5,000 or to imprisonment for a term of not more than six months or to both (subsection 262(2) of the NFP Act).

La personne qui fait une déclaration fausse ou trompeuse, ou qui aide une personne à faire une telle déclaration, commet une infraction et encourt, sur déclaration de culpabilité par procédure sommaire, une amende maximale de 5 000 $ et un emprisonnement maximal de six mois ou l'une de ces peines (paragraphe 262(2) de la Loi BNL).

You are providing information required by the NFP Act. Note that both the NFP Act and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la Loi BNL. Il est à noter que la Loi BNL et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

Canada

Schedule / Annexe
Classes of Members / Catégories de membres

The Corporation is authorized to establish one class of members. Each member shall be entitled to receive notice of, attend and vote at all meetings of the members of the Corporation.

Schedule / Annexe

Distribution of Property on Liquidation / Répartition du reliquat des biens lors de la liquidation

The Corporation will distribute all additional assets and property upon liquidation to another public benefit corporation with similar purposes to its own, or to a Canadian body corporate that is a registered charity under the Income Tax Act (Canada) with similar purposes to its own.

Form 4002
Initial Registered Office Address and First Board of Directors
Canada Not-for-profit Corporations Act (NFP Act)

Formulaire 4002
Adresse initiale du siège et premier conseil d'administration
Loi canadienne sur les organisations à but non lucratif (Loi BNL)

1 Corporate name
Dénomination de l'organisation

Canadian Women's Sex-Based Rights

2 Complete address of the registered office
Adresse complète du siège

[redacted]

3 Additional address
Autre adresse

4 Directors of the corporation
Administrateurs de l'organisation

See attached schedule / Voir l'annexe ci-jointe

5 Declaration: I hereby certify that I am an incorporator of the new corporation or that I am a director or an authorized officer of the corporation continuing into or amalgamating under the NFP Act.
Déclaration : J'atteste que je suis un fondateur de la nouvelle organisation ou que je suis un administrateur ou un dirigeant autorisé de l'organisation se prorogeant ou se fusionnant en vertu de la Loi BNL.

Original signed by / Original signé par
Heather Mason

Heather Mason
[redacted]

A person who makes, or assists in making, a false or misleading statement is guilty of an offence and liable on summary conviction to a fine of not more than $5,000 or to imprisonment for a term of not more than six months or to both (subsection 262(2) of the NFP Act).

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Schedule / Annexe

Directors of the corporation / Administrateurs de l'organisation

Heather Mason [redacted]

[redacted]

This is Exhibit "**B**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

_____

A Commissioner etc.

This is Exhibit "**C**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

_____

A Commissioner etc.

June 2, 2021

By Email

OPEN LETTER

TO: The Canadian Association of Elizabeth Fry Societies

[redacted]

Dear CAEFS Executive Director and Members of the Board of Directors,

In May 2019, your organization, the Canadian Association of Elizabeth Fry Societies (CAEFS), held its annual conference. Women with lived prison experience were invited to attend this conference, though the majority of attendees did not have histories of criminalization. At your Annual General Meeting of the board, one of our sisters, with the support of a select few members, decided to speak. Despite the risks of unearthing one of the worst parts of her incarceration, she told the story of her traumas and sexual harassment while in prison. She explained that a male incarcerated with her in the mental health wing, a male pedophile with hundreds of girl victims, began targeting and victimizing her, and she was particularly triggered due to her past traumas. She explained how the Correctional Service of Canada (CSC) had dismissed her complaints, threatened to isolate her, and labelled her calls for help as bigotry.

In a room of more than 60 women, our sister was met with total silence. Our sister was ushered from the room in tears. Once she was out of the room, the silence was broken by a buzz of comments: "I'm sorry for what happened to her, but you don't need a vagina to be a woman;" and "I am concerned about the transphobia in this room." Of course, transphobia is not a generalized "in the room" kind of airborne contagion, and we can only assume that she was referring to our sister as "the transphobia." The conversation reverted to all of the reasons that trans-women required the full support of the Elizabeth Fry Societies and CAEFS, as though our sister had not spoken at all. That day CAEFS adopted a blanket position of trans inclusion that, among other things, would come to mean supporting the transfer of any transgender identifying males from men's prisons to women's prisons.

"It's easy to pass policy that doesn't affect you."
~ Our sister

For a time after the 2019 CAEFS conference we hoped that CAEFS' lack of concern around transferring male-bodied individuals to women's prisons was due in part to a lack of information. We assumed that CAEFS might have dismissed our sister's story as bigotry because there was a lack of data around the transfers to women's prisons. Since that time, however, CAEFS and EFRY staff have repeatedly silenced criminalized women's reports, questions and input when they challenge CAEFS' transgender position – a position that was decided on by a large majority of women *without* experiences of criminalization.

"Nothing about us without us."

We, the criminalized women you purport to represent, are writing to you now to address how you have silenced us and ignored the urgent threats of violence to criminalized women and girls – threats which you have refused to acknowledge or address in favour of popular politics. Some of us have put questions and comments to you about these threats, only to have them instantly deleted from the chat sections of your webinars. Some of us have reached out in letters to inform you about sexual assault in the prisons and have received no response. Some of us have been dismissed by you as "TERFs." Some of us have entrusted you with our traumas, traumas which you have ignored, denied, or dismissed. We write to you now collectively as a group of women each with lived prison experience, and each with concerns about this situation and reports about how CAEFS has been neglecting us and our sisters inside.

Each one of us who writes to you now has witnessed severe and harmful issues with the numerous and increasing male transfers to the women's prisons. We know there are many more of us still who are too afraid to speak up. Every one of us knows a woman who has either been harassed, sexually harassed, assaulted, or sexually assaulted by a male transfer to a women's prison. For some of us, that woman *is* us.

We have friends, our sisters inside, who are currently struggling with harassment from male transfers. We have friends, other sisters inside who have been sexually assaulted by male transfers, some over extended periods of time. And we have friends, our sisters on release, who are currently struggling with harassment and assaults in halfway houses. We think back to the situation for women in the 1930s when a tunnel was built between P4W and Kingston Penitentiary so that women could be carried underground, to be sexually abused by male prisoners. What has changed? The tunnel is now ideological, and all it takes is a transfer.

Each one of us supports the rights of transgender people to live free from violence. A life free from violence is the fight we continue to wage for ourselves and for our sisters inside. We understand it all too well. We know that today's issues around male transfers did not exist in the same way before men began exploiting the self-identification policy. And while we cannot support the placement of any male people in women's prisons (including guards), we feel that trans-women should have their own, separate accommodation, outside of any women's prison, and one that is uniquely equipped to meet their needs – needs which are different from our own.

Some of us, and many of our sisters with lived experience, have been silenced, not only by male abusers but then again by CSC and by your organization. We know women inside and others who are out, who have been told both by CSC and by CAEFS that *any* complaint against a transgender person is transphobia. Knowing your position, many of our sisters inside are silent about ongoing abuses for fear that EFRYs and CAEFS will withdraw the only halfway house support available to them; contracts without which they cannot be granted parole. It is clear that you do not believe us and that you do not believe women.

CAEFS has repeatedly denied any knowledge of the violence against us. You deny being aware of the upcoming criminal trial against one transgender identifying male who committed multiple sexual assaults while in a women's prison. We have heard these reports, and so many others. If *you* have *not,* then you have not been listening to our sisters inside.

While you have been hosting conferences to teach your staff and others to complete, support and *ensure* transfer requests from the men's prisons, our sisters inside are being sexually assaulted by the male transfers aided by your efforts. Transgender self-identification is automatically believed without question while you continue to deny the violence against women that is taking place. The damage done by neglecting, dismissing, and negating women's accounts of violence, especially sexual violence, cannot be understated – we should never be made to suffer in silence and shame on top of the violence we have already endured.

At CAEFS, again and again, you talk of all of the vulnerabilities of criminalized women and girls. You say you are feminist and cite statistics easily because these statistics are not about you – they are about us. You list the ways we have histories of victimization and abandonment, but you do not listen to us, to the aftermath of our traumas. The aftermath is messy. It is uncomfortable. It isn't politically convenient. When you don't listen to us, you can't meaningfully connect the dots from our histories to our present. And you can't represent us or our interests.

We are here to tell you now - every one of us, and so many of our sisters inside, inherently understands that the presence of males in a prison that is already damaging and oppressive is triggering for us. We *are* the women with severe histories of trauma, most often at the hands of men. Some of us and our sisters inside were and have been unable to complete programming for fear of being triggered by the presence of males. We understand how these males will take advantage of the system to hold power over us. We know these men too well already.

For 25 years, CAEFS was under the leadership of [redacted] who visited with us and our sisters. She sat with us, listened to us, and hugged us. She meaningfully connected the dots, and in return we entrusted her with our histories – histories which we knew she would bring with her to every fight against our oppressors.

Today that trust is gone. When we and our sisters have tried to entrust you with our histories and our experiences you have silenced us, covering up our accounts with your own narrative of trans-inclusion. For decades CSC, too, has tossed women into systems made for men. In this 'new' fight for inclusion, we have once again been excluded.

The issues that are happening to imprisoned and criminalized women are personal to us and personal to our sisters. We understand that a number of CAEFS staff have family members who are transgender and that their personal sentiments around this issue may be informing CAEFS' denial of the violence happening to women inside. As CAEFS members, if you cannot value the experiences and the voices of the women you say you represent, opting instead to prioritize

your own personal issues, then you are in no position to be leaders. You are not in any position to represent criminalized women and girls.

At this point, the rift between CAEFS and criminalized women is vast. We urge you to take urgent action to listen and learn from the women you presume to "co-conspir[e]" with. We urge you to do what is necessary to reach out to women inside who are now largely without feminist supports because your positions and your politics have taken sides against them, blanket denying their accounts of violence and labelling them transphobic. We urge you to join the urgent push for an investigation into the issue of male-bodied transfers to women's prisons and to ban all male-bodied individuals from women's prisons. Lastly, if you cannot adequately represent us, then we urge you to recognize your privilege, your lack of expertise and step down from the positions you hold over us.

Sincerely,

Heather Mason [redacted]

cc: [redacted] *Chair, The Standing Senate Committee on Human Rights*

[redacted] *Correctional Investigator of Canada, Office of the Correctional Investigator*

[redacted] *Chief Commissioner, Canadian Human Rights Commission*

[redacted] *Deputy Commissioner for Women, Correctional Service Canada*

[redacted] *Minister of Public Safety and Emergency Preparedness*,

[redacted] *Shadow Minister for Public Safety and Emergency Preparedness*,

**Some women have participated anonymously for fear of repurcussions.*

This is Exhibit "**D**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.

Position Statement

caWsbar asserts that:

1. Sex -- as distinct from gender -- is a material, biological reality;
2. There are only two sexes – female and male;
3. Disorders of Sex Development (DSD, sometimes referred to as intersex) exist, but people with DSD are either female or male;
4. Humans cannot change their sex; scientific evidence demonstrates that the sex chromosomes within our DNA are present in every one of our cells and are immutable;
5. Gender identity and expression, which have yet to be defined in Canadian law, are culturally-based, stereotypical degrees of "masculinity" and "femininity" (e.g., men like hockey, women like fashion);
6. All Canadians are free to express and present themselves as they wish; however, the concept of "gender identity and expression" does not negate the material, biological reality of women and girls;
7. Women's and girls' sex-based rights to bodily privacy, dignity, fairness and security are enshrined in the Canadian Charter of Rights and Freedoms, in which sex is a protected characteristic;
8. Canadian women's sex-based Charter protections are based upon the fact that females have historically been -- and still are -- disadvantaged and vulnerable due to their distinct biological reality;
9. Therefore, women's and girls' sex-based Charter rights must be strongly asserted and preserved in public policy, and must take precedence over any concept of gender;
10. The inclusion of males in the definition of "woman" under federal and provincial Human Rights legislation (i.e., gender self-identification) is regressive, unfair and perilous for Canadian women and girls.

We will no longer stand by and watch the hard-won rights and protections of Canadian women and girls be eroded through a confusion of sex with "gender identity or expression."

Moving forward, we demand that spaces and resources previously used only by women and girls continue to be sex-segregated.

Such spaces and resources include (but are not limited to):

- homeless shelters and hostels
- change rooms/locker rooms

- washrooms
- rape relief and domestic violence shelters
- prisons
- sporting divisions
- shared rooms in hospitals and university/college dorms
- extracurricular groups (e.g., Girl Guides)
- academic scholarships and grants
- positions on committees
- conferences, seminars and retreats
- lesbian resources and events
- housing co-ops
- music and art festivals
- university/college women's centres

In order to meet our vision, caWsbar intends to take action in ways that protect such sex-based spaces, using our collective voices to demand that women's and girls' Charter rights be both recognized and defended.

Through non-violent resistance, caWsbar will utilize various means to achieve our goals, including increasing public awareness and education through press releases and public talks, increasing political pressure through letter writing and organized protests, as well as legal challenges.

Changing the definition of sex to a statement of self-declaration makes the word a subjective opinion, rather than a simple, verifiable fact.

Jo Bartosch

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Position Statement

The 7 Issues

What You Can Do

Glossary

Media

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of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.

Summary of CAWSBAR Protests

No.	Date	Location	Address	City/Province
1	2021-03-06	Grand Valley Institute for Women	1575 Homer Watson Blvd	Kitchener, ON
2	2021-03-20	Grand Valley Institute for Women	1575 Homer Watson Blvd	Kitchener, ON
3	2021-06-26	Grand Valley Institute for Women	1575 Homer Watson Blvd	Kitchener, ON
4	2021-08-22	Fraser Valley Institute for Women	33344 King Road	Abbotsford, BC
5	2021-09-18	Fraser Valley Institute for Women	33344 King Road	Abbotsford, BC
6	2021-09-18	Edmonton Institute for Women	11151 178 Street NW	Edmonton, AB
7	2021-09-18	Grand Valley Institute for Women	1575 Homer Watson Blvd	Kitchener, ON
8	2021-09-18	Joliette Institute for Women	400 Rue Marsolais	Joilette, QB
9	2021-09-18	Nova Institution for Women	180 James Street	Truro, NS
10	2021-09-18	Ottawa Courthouse	161 Elgin Street	Ottawa, ON
11	2021-10-30	Parliament Hill	Wellington Street	Ottawa, ON
12	2022-03-06	Olympic Plaza	228 8 Ave SE	Calgary, AB
13	2022-03-06	Edmonton Institute for Women	11151 178 Street NW	Edmonton, AB
14	2022-03-06	Fraser Valley Institute for Women	33344 King Road	Abbotsford, BC
15	2022-03-06	Grand Valley Institute for Women	1575 Homer Watson Blvd	Kitchener, ON
16	2022-03-06	Ottawa Courthouse	161 Elgin Street	Ottawa, ON
17	2022-03-06	Quinte Consolidated Courthouse	15 Bridge Street West	Belleville, ON
18	2022-06-12	Ottawa Courthouse	161 Elgin Street	Ottawa, ON
19	2022-10-29	Correctional Service Canada's Central Ontario District Women's Supervision Unit	415 Yonge Street	Toronto, ON
20	2023-06-10	Correctional Service Canada's Central Ontario District Women's Supervision Unit	415 Yonge Street	Toronto, ON

21	2023-09-23	Fraser Valley Institute for Women	33344 King Road	Abbotsford, BC
22	2023-09-23	Fred Thomas Park	400 Wyandotte Street	Windsor, ON
23	2024-03-09	Correctional Service Canada's Central Ontario District Women's Supervision Unit	415 Yonge Street	Toronto, ON
24	2024-09-21	Correctional Service Canada's Central Ontario District Women's Supervision Unit	415 Yonge Street	Toronto, ON
25	2025-03-09	Max Bell Theatre	220 9 Ave SE	Calgary, AB

This is Exhibit "**F**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.


415
SINGLE SEX PRISONS
TRUDEAU ERASED WOMEN
GOVERNMENT SCANDAL, MEDIA COVER-UP
WOMAN IS NOT A COSTUME
SINGLE SEX PRISONS
SINGLE SEX PRISONS
SAME SH*T DIFFERENT CENTURY
WHY ARE MEN IN WOMEN'S PRISONS
BILL C-16 PUT MALE
GENDER SELF-ID HARMS WOMEN
NO MEN
WOMEN CAGED WITH RAPISTS
WOMEN CAGED WITH
TRUDEAU PUT RAPISTS IN WOMEN'S PRISONS
SHIELDS
WHY ARE MALES IN WOMEN'S JAILS?
#RepealBillC16
SEX NOT GENDER
CRUEL AND UNUSUAL PUNISHMENT

This is Exhibit "**G**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.


CRUEL AND UNUSUAL PUNISHMENT
NO MALES IN WOMEN'S JAILS

This is Exhibit "**H**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.

Summary of Heather Mason's Publications

No.	Date	Document	Publisher/Platform	Title	Online URL
1	2019-12-05	Article	Women are Human	*The alarm has been sounded, who's going to respond?*	https://www.womenarehuman.com/the-alarm-has-been-sounded-whos-going-to-respond/
2	2021-05-24	Letter	Maine State Legislature	*Untitled*	https://legislature.maine.gov/testimony/resources/CJPS20210518Mason132664243382187374.pdf
3	2021-06-22	Brief	The Standing Committee on Public Safety and National Security, House of Commons	*Brief submitted by Heather Mason on the Current situation in federal prisons in relation to reports of sexual coercion and violence in federal prisons*	https://www.ourcommons.ca/Content/Committee/432/SECU/Brief/BR11468302/br-external/MasonHeather-e.pdf
4	2022-04-21	Article based on Interview	Fresh Magazine	*Pursuit 365 Day 111: Heather Mason*	https://freshmag.ca/pursuit-365-day-111-heather-mason/
5	2023-10-10	Chapter in Book	Women's Declaration International	*Women's Rights, Gender Wrongs: the global impact of gender-identity ideology*	Not available online
6	2024-06-22	Submission to the Federal Government	CAWSBAR	*Submission to the Employment Equity Act Review Task Force: The Importance of Clearly Defining Women Within The Employment Equity Act*	https://www.cawsbar.ca/post/submission-to-the-employment-equity-act-review-task-force-the-importance-of-clearly-defining-women

7	2023-02	Forward in Publication	Macdonald Laurier Institute/ Jo Phoenix	*Rights and Wrongs*	https://macdonaldlaurier.ca/wp-content/uploads/2023/02/20230117_Rights_and_wrongs_Phoenix_PAPER_FWeb.pdf

This is Exhibit "**I**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.

Summary of Heather Mason's Media Appearances

No.	Date	Host	Video Title	Online URL
1	2019-12-09	Megan Murphy	Heather Mason on the transferring of males into women's prisons in Canada	https://www.youtube.com/watch?v=GrxdLNg8-gs
2	2020-02-11	The Progressive Radio Network	The Infectious Myth - Gender Self-ID and Prisons with Heather Mason	https://www.youtube.com/watch?v=6tQizt9kNeE
3	2020-02-15	Women's Liberation Radio News	Women's Prisons: What are they *really* like WLRN Video	https://www.youtube.com/watch?v=sxGqpn2Is4o
4	2020-05-27	Megan Murphy	Women's Spaces and Places - Sports, Prisons, and Shelters	https://www.youtube.com/watch?v=oY3PE6gxmCk
5	2020-08-28	Jennifer Chavez, Women's Liberation Front	Women Speak! Should Men be Allowed in Women's Prisons?	https://www.youtube.com/watch?v=pI9wbaCJXKE
6	2021-03-20	Gender Critical Story Hour with Amy & Esme	Ep. 6 - Prison Protest with Heather Mason and Madeline Riversong	https://www.podbean.com/media/share/dir-wmytc-d7ef2df
7	2021-04-03	Women's Declaration International (WDI)	Women in Prison: Heather Mason founding member of CaWsbar Canada FQT 03 April 2021	https://www.youtube.com/watch?v=SyN47rJeL5w
8	2021-04-03	Women's Declaration International (WDI)	Feminist Question Time - 3 April 2021: Women in Prison Canada, Australia & UK + a report from France	https://www.youtube.com/watch?v=ABJWfTl3pJQ
9	2021-04-13	Laoise Ui Aodha de Brun, The Countess Conversations	Mixed Sex Prisons #1 - Rhona Hotchkiss, Gearoid O Loinsigh and Heather Mason	https://www.youtube.com/watch?v=PFxrojXJol4
10	2021-06-29	Women's Liberation Radio News	Protest at Grand Valley Institution for Women	https://www.youtube.com/watch?v=xGrUeJAYRqE&t=383s
12	2022-01-11	Tweetstreet Occupied Scotland	TS47 Heather Mason Keep Prisons Single Sex	https://www.youtube.com/watch?v=JGXemY23mco

13	2022-01-23	Stuart Parker Dot CA	Cocktail Hour with Stuart Parker S02E02 Heather Mason/Dry	https://creators.spotify.com/pod/profile/stuart-parker6/episodes/Cocktail-Hour-with-Stuart-Parker---S02E01-Heather-MasonDry-e1dbhj0
14	2022-01-25	Benjamin A Boyce	Pandemic Impacts: Canadian Prisons with Heather Mason	https://www.youtube.com/watch?v=pPnpLULKk6o
15	2022-01-28	Lindsay Platoshyn, Distorted Linds	Gender Ideology Destroying Women's Prisons with Heather Mason - Life Through a Distorted Linds	https://www.youtube.com/watch?v=_2xhZm9f8t4
16	2022-03-06	WDI Quebec	Entretien avec Heather Mason	https://www.youtube.com/watch?v=QEGPEjZ2-kQ
17	2022-04-07	Gender Critical Story Hour with Amy & Esme	Ep. 10 - Heather Mason and Linda Blade	https://www.podbean.com/media/share/dir-72cqa-1382bfe6
18	2022-05-04	The Giggle Podcast	The Giggle Podcast - Episode 6 - Heather Mason	https://www.youtube.com/watch?v=ACz-pezMEFw
19	2022-08-30	The Marc Patrone Show	Fake Polls Smearing Convoy, Trans Violence in Women's Prisons, & Trudeau Govt Energy Fail	https://music.amazon.com/podcasts/252a55e3-5686-41cc-aae2-a0eec334800d/episodes/f5478f24-cce4-4530-98f9-f99e6e54b293/the-marc-patrone-show-the-marc-patrone-show---august-30-2022---fake-polls-smearing-convoy-trans-violence-in-women's-prisons-trudeau-government-energy-fail
20	2022-11-11	Make More Noise	Wombs with a View - Prison Special	https://www.youtube.com/watch?v=qXDm0_om0jg
21	2023-03-02	The Democracy Fund	Protecting Women's Spaces In the Age of Transgenderism	https://www.thedemocracyfund.ca/protecting_women_spaces_in_the_age_of_transgenderism

22	2023-06-13	David Menzies, Rebel News	Protests erupt against policy allowing violent biological male sex offenders in women's shelters	https://www.youtube.com/watch?v=Vr3lKlPLw2U
23	2023-09-11	Allie Beth Stuckey	Former Prisoner on the Dangers of Men in Women's Prisons Guest Heather Mason Ep 870	https://www.youtube.com/watch?v=CbKnqW7bJjY
24	2023-11-23	Harrison Faulknee, Juno News	SCANDAL: Violent men wreaking havoc inside women's prisons	https://www.youtube.com/watch?v=4LiU_D1Dz2w
25	2023-11-23	Rebel News	Rebel News LIVE! Calgary 2023: Heather Mason	https://www.youtube.com/watch?v=5uN0o5piFps
26	2023-11-27	Tanya Granic Allen (Counterpoint)	Disturbing Stories Coming out of Women's Prisons Since Biological Men Started Transferring	https://www.youtube.com/watch?v=po3mCC8bsFU
27	2024-02-16	Gillian Robinson, Off the Rails	Heather Mason on men in Women's Prisons	https://www.youtube.com/watch?v=XtQZga2x-o0
28	2024-03-17	CAWSBAR	Reality Based Women Unite! 2024 Real talk on International Women's Day organized by CaWsbar	https://www.youtube.com/watch?v=VYLTR2NvDCc&t=4479s
29	2024-03-20	Rebel News	It is dangerous': Activist addresses concerns about allowing males in female prisons	https://www.rebelnews.com/_it_is_dangerous_activist_addresses_concerns_on_allowing_male_inmates_in_female_prisons
30	2024-03-23	North American Angst	Untitled	https://x.com/i/spaces/1eaKbgRaLVnGX/peek
31	2024-09-15	Ash, The Broadcast	Do Men Belong in Women's Prisons?	https://www.youtube.com/watch?v=AqMDZnZjbrY
32	2025-03-23	CAWSBAR	Reality Based Women Unite 2025 exclusive replay for attendees	https://www.youtube.com/watch?v=FTFpQfxC-mY
33	2025-04-15	Tanya Granic Allen (Counterpoint)	Is there a safe space to wrestle with women's rights and transgender rights?	https://www.youtube.com/watch?v=j4pD7YJg8Lo
34	2025-05-09	Reduxx	Untitled	https://x.com/ReduxxMag/status/1920976750315552976

35	2025-09-21	Jeremy Borg, Western Standard	Advocacy group says "trans woman" in women's prison is endangering female inmates	https://www.youtube.com/watch?v=Ym7aK20mR-I

This is Exhibit "**J**" referred to in the Affidavit

of HEATHER MASON Sworn/Affirmed before me at

[redacted]

[redacted] this 5th day of December, 2025.

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A Commissioner etc.

June 22, 2021

To The Standing Committee on Public Safety and National Security
[redacted]

Re: Brief submitted by Heather Mason on the Current situation in federal prisons in relation to reports of sexual coercion and violence in federal prisons

Dear Parliamentarians,

I, Heather Mason, have prepared the following briefing document to be submitted to the Standing Committee on Public Safety and National Security as you investigate matters relating to the federal incarceration of women. What follows is an overview of the fallout of the Bill C-16 gender identity legislation and the standard of self-identification in the context of women's prisons. I have included examples of specific incidents. My brief pertains to the grave and harmful violence and ongoing threats of violence currently taking place in the federal prisons for women. I submit this brief as an individual and ask that you consider the information contained herewith fully and independent of any politically motivated assumptions that would dismiss these reports without review, debate or scrutiny.

My Vested Interest & Expertise

In 2019 a formerly federally imprisoned woman spoke at an annual meeting of a national prison advocacy organization. This woman spoke about repeated sexual harassment by a transgender individual, [redacted][1] who had been transferred to a women's prison. She explained that the harassment took place while she was being monitored for severe mental health concerns. She explained that it deeply aggravated her condition, that she was triggered with Post Traumatic Stress Disorder symptoms arising from her childhood trauma and that she became suicidal. Her disclosure of sexual harassment was urgently met with accusations of transphobia, and just as disclosures of violence against women are often met with disbelief, her experience was dismissed.

As a formerly federally imprisoned woman, I witnessed how my sister was silenced. Having struggled with addiction driven by abusive childhood experiences myself, I both understood the ways that my sister was triggered by her experience and knew of other similar stories of sexual harassment in prison, including my own. For two years, I have been dedicated to reaching out to criminalized women in order to discover if these incidences were happening in isolation or if other women were suffering alone. Since that time, I have also been assisting criminalized women as a feminist advocate with the organization Strength In SISterhood (SIS). Through SIS, I have worked on a variety of other systemic issues affecting women in prison, including segregation, strip-searching and conditions of confinement during the pandemic. As a formerly imprisoned woman, I have a sincere vested interest in the policy frameworks and systems that affected me and now affect my sisters inside.

[1] Formerly [redacted] convicted of the child sexual abuse of at least 60 children, listed at page 11, Schedule A,

Throughout the last two years, I have spoken to a number of women who have reported to me the experiences they had in prison or the events they witnessed. Below I have included some of these accounts. As an individual, I do not have established or free access to the women in prison[2] and have reached out to women through my personal circle, through friends, or otherwise. The majority of the reports I have described below are local. These accounts are by no means comprehensive as I am only one woman. In addition, there is a lack of data and a lack of disclosure by the Correctional Service of Canada from which a more adequate investigation could take place. In this way, the reports below should not be weighted according to their frequency but should be taken as indicators that these events are happening to women inside.

Distinguishing Between Transgenderism and Exploitation

The issue of transgender transfers from male prisons to women's prisons became particularly significant and severe in recent years, with CSC's approval of transfer requests absent any evaluation standard. Women have reported to me that since the implementation of Bill C-16 and the broad standard of self-identification, issues of assault and harassment[3] that previously existed with some transgender individuals became notably more severe and more frequent. In addition, women have reported to me that since the higher frequency of transfers (both pre-and post-operative individuals), women have experienced frequent issues of sexual assault, sexual harassment, stalking, sexually transmitted diseases, negative impacts to programming, negative emotional impacts, increased issues with drugs, and increased issues of fear of retaliation.

That women have reported such an extreme increase in the abuses they have suffered by transferred transgender individuals suggests that the issue of transfers to women's prisons is <u>not</u> an issue of transgender rights and is instead an issue around the entitlement criteria for transgender transfer to women's prisons.

An entitlement standard of self-identification removes any scrutiny from the transfer process. Without any scrutiny, verification, question or safeguards, this policy operates as an honour system and blindly accepts that any transgender entitlement claim by a male prisoner must be a truthful one. A transfer request in the context of self-identification by male prisoners then accepts the following as truth in all cases:

1. The individual is transgender until a time when the individual states that the individual is not;
2. As a transgender individual, the individual <u>definitively</u> faces a situation of discrimination and/or harm; and
3. Approval of a transfer request to a women's prison will provide adequate protection from the (assumed) situation of discrimination or harm (entitlement).
4. No alternative motive exists around the individual's self-identification and transfer request.

[2] The Canadian Association of Elizabeth Fry Societies (CAEFS) has unique access to the women's prisons. They are the only organization with this access.

[3] Specific incidences are reported below at pages 3-5, paragraphs I-XII.

In fact, a male prisoner exploiting this policy would be at no cost for declaring transgenderism, would undergo no credibility assessment for the truth of his declaration or the extent of the discrimination he faces, and would automatically stand to gain access to the entitlements.

The issue then is not that transgender identifying individuals should or should not be entitled to transfer. The issue is the potential for this policy to be easily exploited by dishonesty which goes unchecked indefinitely. As I will demonstrate in the subsequent sections, it has been the case that even when males have committed grievous violent and sexually violent harms to women and girls, they have been granted transfers to women's prisons and halfway houses.

In addition, there are no mechanisms to prevent ongoing harm against the women imprisoned with the transferred transgender individuals. For incarcerated transgender individuals who have gone on to commit deplorable abuses against women inside, no formal reprimand exists to remove them from their victim pool. The reprimand ***is*** incarceration with their victim pool. Their self-identified transgender status will ensure their entitlement to placement in a women's prison regardless of their charges or convictions and without any mechanisms to challenge their self-identification. For example, one woman's abuser, a transgender individual (formerly [redacted])[4] imprisoned with her throughout 2019, will be tried for rape in the fall of 2021. Even if he is convicted, there is no way to both isolate this individual from his victim pool and honour his transgender entitlement to placement in the women's prison.[5]

Immediate Threats to Women In Prison

Since approximately 2019, women in and from the federal prisons have, either directly to me or publicly, reported the following incidences pertaining to transgender individuals[6] who have been transferred from a men's prison to a women's prison:

I. **Rape**: At least three women have reported that while imprisoned in a women's prison or in a halfway house, they were raped by a transgender individual.
    a. One of these women has reported that she was raped on a regular basis for an extended period of time. A criminal proceeding against the accused, [redacted] (formerly [redacted] will commence in the fall of 2021. In addition, this woman has reported that she has faced significant pressure to recant so that the charges may be withdrawn. One of the people applying this pressure has been a lawyer from the Public Prosecution Service of Canada.

II. **Sexual assault other than rape:** At least three women have reported that they experienced unwanted sexual touching by a transgender individual while imprisoned.

[4] The specific incident is reported below at page 3, paragraphs I & Ia).
[5] It should be noted that prior to self-identifying as transgender, [redacted] convictions did not include abuses against women or girls.
[6] All references to "transgender individuals" that follow in this section are references to transgender individuals transferred from a men's prison to a women's prison or women's halfway house with the exception of 1 transgender man referenced on page 5.

III. **Sexual harassment:** Several women have reported that while imprisoned, they were the subject of sexual harassment by a transgender individual. These reports described any one or multiple of the following behaviours, occurring repeatedly over time:
- stalking, including following women to the bathroom and showers.
- stalking, including following women to the bathroom and showers, remaining directly outside of private stalls and making inappropriate or aggressive sexually suggestive comments.
- grooming behaviours and/or sexist or sexual comments about women's physical appearance or behaviours.
    a. One of these women reported that while in the mother-child program, two transgender individuals with convictions for pedophilia, [redacted] and [redacted], would loiter near her and her child, making sexist and inappropriate antagonizing comments.

IV. **Harassment**: Several women have reported that while imprisoned, they were the subject of harassment by a transgender individual. These reports described any one or multiple of the following behaviours, repeatedly occurring over time: verbal threats, yelling, ridicule, name-calling, and defamation.

V. **Assault**: Several women have reported that while imprisoned, they were the subject of one or multiple physical assaults by a transgender individual.
    a. One of these women reported that the force with which the transgender individual hit her overpowered her far beyond what women are typically capable of. This woman additionally reported that she could not report the assault for fear of reprisal as well as for fear of receiving an institutional charge and being reprimanded for actions that were not her own.

VI. **Drugs**: Several women have reported that while imprisoned, they witnessed issues around transgender individuals bringing drugs into the institution, gaining access to drugs within the institution, and distributing drugs to multiple vulnerable women. Each of these accounts noted that these issues around the supply, access and distribution of drugs happened to much greater extents than is normal or may happen in the women's prisons. Each of these accounts noted that transgender individuals were seldom caught or reprimanded for these issues.
    a. One of these women witnessed a transgender individual supply a very young woman with fentanyl. Although this woman had no previous history of hard drug use, the transgender individual assisted her in taking fentanyl with a syringe for the first time.

VII. **Reneging on former declarations of transgenderism:** Several women have reported that, while imprisoned, they witnessed a transgender individual declare to one or multiple others that he was, in fact, a man, and he was not transgender.

VIII. **Exhibitionism**: Several women have reported that while imprisoned, transgender individuals exposed their genitalia to them, and in many instances, to other women around them as well.

IX. **Impunity**: Several women have reported that, while imprisoned, they witnessed transgender individuals break the rules without any response or reprimand from correctional staff, including the known distributing of drugs, the known ingestion of drugs, the known threatening of women with assault or murder, and failing to stand for count among other things.
    a. One of these women recounted witnessing a transgender individual publicly having heterosexual sex with a woman in the gym, a common area, without interference from staff.
    b. Two of these women expressed that because these transgender individuals received these "benefits" and were (perceived to be) untouchable by correctional staff, women perceived them to hold even more power over them and were additionally afraid of reporting abuses or grieving to correctional staff for fear of being dismissed and for fear of retaliation.

X. **Sexually transmitted diseases**: Several women expressed that while imprisoned, the prison began newly providing the morning-after pill and treatments for sexually transmitted diseases, including HIV.

XI. **Impacts to programming**: At least one woman reported that while imprisoned, she either had difficulty with or discontinued programming due to the triggering impacts of participating in group programs aimed at the healing of childhood sexual trauma while a transgender pedophile was also participating.

XII. **Negative emotional impacts**: Several women have reported that while imprisoned, they suffered negative emotional impacts related to being imprisoned with transgender individuals, particularly those with violent and sexual crimes against women and children. Negative impacts included chronic and acute incitement of symptoms of Post-Traumatic Stress Disorder, flashbacks, anxiety, anger, depression, hopelessness, and suicidality, among others. For some of these women, these impacts have been ongoing.

In addition, in 2020, a federally incarcerated man reported to me that, prior to 2019, he witnessed another man incarcerated with him, (then) [redacted] (now [redacted][7]), assemble a group of men in order to "teach" them how to self-identify as female, utilize the correctional grievance system to obtain transgender rights entitlements, and request and successfully obtain a transfer to a women's prison. It was reported to me that these "lessons" took place just prior to [redacted] own transfer to a woman's prison. It is also worth noting that after being transferred to maximum security in the women's prison, this individual elected to transfer back to the men's prison despite former claims of violence there.

In addition, in approximately 2020, a formerly incarcerated woman who was then working with criminalized women and girls reported receiving a verbal rape threat while assisting a criminalized transgender male. Although she reported the threat to her organization's management personnel, she was discredited, received a great deal of scrutiny and shaming comments alleging that she was transphobic, and could not remain at her employment due to the

[7] Formerly Michael Williams, convicted of child rape and murder, listed at page 11, Schedule A, 10).

harassment she faced from colleagues and her employer. She reported feeling ostracized and harassed by members of the organization.

In addition, in or around 2018, one transgender man in a women's prison had repeatedly requested to be transferred to a men's prison. CSC denied these requests due to the inevitable safety concerns of placing a biological female in a men's prison. The acknowledgement that a biologically female individual would be at severe and certain risk of harm (very likely rape and sexual violence) in a men's prison is inherently at odds with the placement of men, many with proven histories of violence against women and girls, in women's prisons.

In addition, in or around 2017, it was reported to the Deputy Commissioner for Women that many of the transgender individuals interviewed in men's prisons had **no** desire to transfer to women's prisons as they did not have significant concerns for their safety or equal treatment. Gay men, however, have long been the targets of harassment, ridicule and violence in prison, and CSC has failed to provide them with a transfer policy or alternative accommodations, nor have they addressed the issues of violence in the men's prisons. The exploitability of the standard of self-identification does a disservice to genuine transgender women in men's prisons who should have their unique needs, needs that are different from women's needs, met by CSC in a responsive way.

Males with Misogynistic Violence Incarcerated in Women's Prisons

A number of women have reported to me that there have been issues with transgender individuals who do not have convictions for violence or sexual violence against women and children.[8] What is even more shocking is the high frequency of approved transfers from transgender individuals *with* convictions against women and children since the implementation of the transgender self-identification standard. Women have reported repeated abuses from transgender individuals with convictions for femicide, sexual assault, pedophilia and severe assaults that targeted women or children. In many cases, a transferred transgender individual has had convictions related to more than 1 murder or sexual assault of a woman or child in a way that reveals a pattern of targeted abuse against these groups.

In some cases, a transgender individual was known to have had between 2 and 10 or hundreds of victims from these groups. For example, [redacted] (formerly [redacted] a convicted pedophile, was known to have had at least 60 child victims[9]. One woman reported to me that he sexually harassed her while she was imprisoned with him in the Structured Intervention Unit meant to address her acute mental health needs.[10] She reported that this severely aggravated her mental health deterioration, and she continues to endure detrimentally negative impacts today. Another woman reported to me that this same individual sexually assaulted her while she was imprisoned with him.[11]

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[8] In this case I am specifically referencing men with convictions against any children and not only female children as many women have reported negative emotional impacts from having been imprisoned with pedophiles. Women report being triggered by pedophiles regardless of their specific victim pools.

[9] Formerly [redacted] convicted of the child sexual abuse of at least 60 children, listed at page 11, Schedule A, 2).

[10] The specific incident is included in reports above at page 4, paragraphs III & III.a.

[11] The specific incident is included in reports above at page 3, paragraph II.

Since approximately 2016, news and various other sources have reported on at least 58 individuals in men's prisons who have self-identified as transgender. Many of these individuals have appalling crimes of assault, sexual violence, and murder against women and children. Although CSC does not readily provide data to oversee trends related to the individuals transferred to the women's prisons, you will see on page 11 (Schedule A) that I have compiled information regarding the convictions of transgender identifying individuals from reports from women inside, from news sources, and from various other sources. Those with violence against women or children are highlighted. Without transparency or data disclosure from CSC, the information in Schedule A is most certainly a considerable underestimate of the number of transferred individuals with convictions against women and children.

Other Repercussions

When compared with men, women in prison have unique histories and unique pathways to criminalization. At least 68% of federally imprisoned women have a history of sexual assault, and at least 86% of them have been physically abused.[12] The majority of women are federally incarcerated for survival and trauma-related crimes such as property and drug-related issues.[13] Where violent crime is reported, statistics often fail to capture a large portion of women who act in self-defence in ways that are not recognized by archaic self-defence legislation, legislation that has never accounted for women's differences. This context is particularly important when we consider that Indigenous women represent less than 4% of the general population[14] but represent 49% of women accused of homicide; nearly twice the proportion of indigenous men accused of homicide respective to the female and male populations.[15] For these reasons, among many others, women's "risk" is less than that of federally incarcerated men.[16]

Women's unique pathways and histories provide a critical context for the establishment of real solutions to women's criminalization. Although there is overall very little data and a reluctance to collect data about transferred transgender individuals in prison, transgender individuals coming from the men's side have vastly different pathways to criminalization than women. The transfer of transgender individuals to women's prisons obscures these differences in a number of ways.

Although security in the women's prisons arguably does not operate differently enough from the men's prions,[17] the transfer of males with higher risk is accommodated by CSC with male-specific security interventions which are more restrictive, more brutal, and more equipped than they have typically been in the women's prisons. Women have long rejected this kind of militant "management." In particular, Indigenous women have long been characterized as having problematic "institutional adjustment" in these kinds of conditions[18] as they reject colonial structures that have historically restricted and "managed" Indigenous people in horrifically brutal

[12] Annual Report of the Office of the Correctional Investigator 2014-2015, https://www.oci-bec.gc.ca/cnt/rpt/annrpt/annrpt20142015-eng.aspx
[13] Statistics Canada, https://www150.statcan.gc.ca/n1/pub/85-002-x/2019001/article/00001-eng.htm
[14] Statistics Canada, https://www150.statcan.gc.ca/n1/pub/89-503-x/2010001/article/11442-eng.htm
[15] Statistics Canada, https://www150.statcan.gc.ca/n1/pub/85-002-x/2019001/article/00001-eng.htm
[16] Struthers-Montford & Hannah-Moffat, 2020; & CSC, A Comprehensive Study of Recidivism Rates among Canadian Federal Prisoners, https://www.csc-scc.gc.ca/research/err-19-02-en.shtml
[17] The Task Force on Federally Sentenced Women, https://www.csc-scc.gc.ca/women/092/002002-0001-en.pdf
[18] Blanchette et al., 2002, https://publications.gc.ca/collections/collection_2010/scc-csc/PS83-3-127-eng.pdf

ways. As security measures in the multi-level prisons for women increase, women's health, mental health and trauma reactions will also increase.

Women's unique pathways and histories are equally obscured with the absorption of transferred transgender individuals' statistics. Transgender individuals' convictions for violence, extreme violence, and sexual violence against women and girls do not exist and do not exist the same way among criminalized women. For example, women are almost never found to be Dangerous Offenders (DO) and the one woman who has been designated a DO has a dramatically different life and conviction history from a typical male DO. In fact, this Indigenous woman was designated a DO due to CSC's assessment of her institutional adjustment.

This aggregation of data is particularly problematic when we consider how small the female prison population is relative to the male population. For example, incorporating the extreme violence and sexual violence committed by [redacted][19] [redacted][20] [redacted][21] and [redacted] into women's statistical profiles creates a false narrative of women's pathways to crime. Given that data such as this is so integrally incorporated into risk measures at sentencing, at federal prison intake, into security classification, into reclassification, into programming and at parole, the repercussions of skewing women's data in this way will be severe. This is more alarming when we consider that the standard of self-identification for transfer requests is relatively new and that transgender transfer requests are likely to increase as time goes on.

As I have enumerated, the consequences of transferring transgender individuals to women's prisons are many. Be that the data regarding transfers have not been publicly disclosed, nor has it been properly analyzed, there are undoubtedly many more consequences than we now realize. Consequences like those I have described, such as sexual harassment, negative emotional and mental health reactions, and barriers to programming, will inevitably continue to interact and accumulate, causing severe harm to female prisoners.

Political Blindness, CAEFS & Resources for Women

In 2019 a formerly federally imprisoned woman spoke at an annual meeting for the Canadian Association of Elizabeth Fry Societies (CAEFS). CAEFS is an organization mandated to represent the interests of criminalized women and girls, and yet when this woman disclosed abuses by a transgender transfer, [redacted][23] to a room of over 60 women, her abuse was dismissed with accusations of transphobia. Having witnessed this and the aftermath for my sister, I began my own investigation into the issue of transgender transfers to women's prisons.

In my investigations, I have found that not only was my sister's experience with transgender transfers only a drop in the bucket, but her experience of being silenced and dismissed as transphobic was equally common. On June 2, 2021 a group of more than 20 criminalized women

[19] Formerly [redacted] convicted of the child sexual abuse of at least 60 children, listed at page 11, Schedule A, 2).
[20] Formerly [redacted] charged with the rape of a female prisoner, listed at page 11, Schedule A 15).
[21] Formerly [redacted] convicted of child rape and murder, listed at page 11, Schedule A, 10).
[22] Formerly [redacted] convicted of the rape of a child under 1yr old, listed at page 11, Schedule A, 3).
[23] Formerly [redacted] convicted of the child sexual abuse of at least 60 children, listed at page 11, Schedule A, 2).

came together to address how CAEFS has been silencing their reports of victimization, their requests for help, and their insights from inside.[24] CAEFS, in their response,[25] did not accept that our letter constituted reports of abuses. They cited no knowledge of any complaints from women inside (and no knowledge of the upcoming rape trial) despite my sister's disclosure in 2019, despite a letter from myself on April 7, 2021, and despite concerns raised by the Office of the Correctional Investigator in 2019.[26]

Because the Charter recognizes women as a disadvantaged sex class, the human rights legislation is not the foremost authority on a competing rights situation such as this. Despite this, CAEFS equally cited their adoption of the *Canadian Human Rights Act* (*CHRA)* standard of protected grounds, as well as complaints of violence "in prison" from "gender-diverse", and yet they have not received any complaint from women regarding their experiences with transferred transgender individuals. In fact, CAEFS has repeatedly neglected or denied allegations against transgender individuals, dismissing them as transphobic.

Women from prison have had their accounts of violence dismissed[27] by prison staff, organizations, and politicians alike who seek to uphold an image of absolute support for the transgender community. Because of this, it is taken for granted either that transferred transgender individuals *cannot* be the culprits of violence against women *because* of their self-identification and transgender status (in spite of the fact that many have histories of unimaginable violence to women and children), or that the violence they commit against women is constituted isolated incidences which are unimportant relative to upholding the commitment to transgender rights. In either case, women's accounts of violence are not being believed. As a historically oppressed group, violence against women such as this is part of a larger systemic problem of misogyny.

The Office of the Correctional Investigator (OCI) has labelled the issues of sexual coercion and violence in prison, "the most underreported types of crimes",[28] as "a culture of silence."[29] The culture of silence, or rape culture, that prevents women from speaking out against guards and staff, and male violence generally, now equally encompasses women's experiences around transferred transgender individuals. If even one woman has reported an experience of sexual violence, it can be assumed that there are nine others who have not.[30] Women who have experienced violence from transferred transgender individuals are now largely without supports, without recourse and without *any* surety of security from targeted sexism and sexual violence because any disclosure of violence is treated as transphobia. This silencing has, in many cases,

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[24] Letter to CAEFS from We the Criminalized Women, dated June 2, 2021, https://rapereliefshelter.bc.ca/open-letter-to-caefs-from-criminalized-women/

[25] Letter to We the Criminalized Women from CAEFS, dated June 4, 2021, https://ac935091-bf76-4969-8249-ae3a107fca23.filesusr.com/ugd/d2d30e_a5eeb2ec0c744ad397887e54d89e1c8a.pdf

[26] Office of the Correctional Investigator Annual Report 2018-2019, https://www.oci-bec.gc.ca/cnt/rpt/annrpt/annrpt20182019-eng.aspx#s7

[27] Women's accounts of violence should be considered in the historical context of women's subjugation and silencing, a context that is still very much prominent today and that equally affects this issue (as I have detailed throughout).

[28] Office of the Correctional Investigator, https://www.oci-bec.gc.ca/cnt/rpt/annrpt/annrpt20192020-eng.aspx#s11

[29] Ibid.

[30] I have personally received reports of 3 incidences of rape in a women's prison by a transferred transgender individual. The specific incidences are detailed on page 3, at paragraph I.

stopped women from ever reporting their experiences as they are already reluctant to do so due to the shame around sexual assault, sexual harassment and reporting in prison generally.

As corrections, other governing bodies and advocacy organizations have taken direction from the *CHRA* and Parliament's intention, any direction to take women's concerns, complaints, and reports of violence seriously must be top-down, starting with Parliament. The next section provides recommendations for Parliament that will begin to address the issues of violence against women in prison.

Recommendations

1. CSC should immediately halt the transfer of any transgender individuals from men's prisons to women's prisons.

2. Transgender individuals with histories of violence toward women or children who have already been transferred from a men's prison to a women's prison should be immediately moved to an accommodation other than a women's prison.

3. Transfer criteria for transgender individuals should be developed in consultation with transgender groups and organizations. These transfer criteria should ensure that transgender individuals who meet the criteria be provided with a transfer to an accommodation other than a women's prison and one that is specifically designed to meet the unique needs of transgender people.

4. Independent feminist supports of women's choosing should be provided to all women inside in order to foster the trust and support required to allow women to disclose any experiences of violence. Women should be allowed access to these supports either in person or by telephone, or both on a regular basis.

5. Prison population statistics should be registered according to prisoners' sex at birth, or two new categories of statistics should be established for transgender women and transgender men respectively.

I am happy to address any questions.

Sincerely,

Heather Mason

Schedule A. Table of Incarcerated Transgender Individuals
Individuals with histories of violence against women or children are highlighted.

Formerly named	New name	Convictions	Source	Status
[redacted]		First Degree Murder	Montreal Gazette	Federal Prisoner - Won transfer CSC is appealing it. CSC won and transfer denied. Had surgery and is at Joliette.
		Serial Pedophile	**National Post**	**Federal is on a Long Term Supervision Order Halfway House in B.C.**
		Child killer and baby rapist Dangerous Offender	**The Star**	**Federal prisoner- Fraser Valley for women. Prostituted himself to other male prisoners, developed a drug addiction in prison. Threatened to kill a female guard, found with a homemade knife. Mutilated his own genitalia. Meets criteria for psychopathy and severe borderline personality disorder**
		Sex offender	**The Star - 27/05/2018**	**Federal prisoner-Transfer denied for federal. Was in Vanier for women for provincial**
		Murder	BC Local News	In Provincial Alouette Correctional Centre for Women fighting extradition.
		First Degree Murder	The Star	Federal Prisoner -Fraser Valley for women.
		Manslaughter x2	Barrie Today	Federal prisoner - Grand Valley for women.
		Robbery	Cloverdale Reporter	Incarcerated at Surrey Pre-trial and then started identifying as a woman.
		Fraud, Robbery, stolen prop, uttering death threats 10 bank robberies	Globe & Mail CanLii	Provincial - Alouette Correctional Centre for Women Deceased
		First Degree Murder/Rape on a child	**CBC Women's Prison Network**	**Federal Prisoner - Kent to Fraser Valley – elected to return to Kent. Fought another trans women at Kent and got shipped to Sask pen. Reported to have been giving groups of men lessons on how to self-identify as transgender and request transfer to a women's prison.**
[redacted]		14.5 years for bank robbery 2nd or 3rd time federal offender		Federal Prisoner- Fraser Valley Engaged (broken up) to Michael Williams. Rumored to have impregnated a female prisoner. Is dating a woman in FVI. She is not pregnant
		Second Degree Murder x2	National Post	Federal Prisoner - Grand Valley to Toronto halfway house - back in GVI. Harassment of multiple women there.
		Beat his ex with a tire iron	**CBC**	**Federal prisoner was at Fraser Valley for women and is out.**
		Second Degree Murder Armed Robbery	CBC	Federal prisoner - Grand Valley for women (died last year). 45 years behind bars. Sexually harassed many women.
		Armed Robbery Bank robber 3th time federal offender	**globe and mail**	**Federal prisoner - Grand Valley and Edmonton. Spent 2 decades in male prisons. Sells hormones, has heterosexual sex with the women, was put in segregation over a HIV scare on compound, sexual assault**

				charge. Told my friend not to call him a woman on the street. Currently on release at a halfway house. Warrant expires Feb 2021. Will be tried for rape in fall 2021.
[redacted]		**Sex crimes**	**London Free Press**	**South West Detention Windsor, Ontario (provincial) I don't know where he is now**
		Second Degree Murder	A Gender Variance	Federal prisoner - Fraser Valley for women Rumours they died but cant confirm that
		Second Degree Murder	The Star	Federal prisoner - Was at Stony Mountain I don't know if they transferred to a women's prison or not Killed a female in a home robbery
		Murder/ Sexual assault Dangerous Offender	**Vancouver Sun**	**Federal prisoner.**
		Robbery, Assault w weapon, Forcible confinement, Dangerous Offender Sexual predator	**The Peterborough Exam**	**Federal prisoner.**
		Murder?		Federal prisoner - Stoney Mountain – Rumoured he doesn't want to transfer.
		First Degree Murder/Rape	**The Globe and Mail**	**Federal prisoner - Saskatchewan pen - Rumoured he doesn't want to transfer.**
		Sexual predator	**MSN News**	**Federal prisoner - Edmonton - he is out and a high risk to reoffend. Was in with men not women.**
		Sexual Assault	**The Star**	**Provincial - Quebec**
		Rape, Sexual Assaults, Robbery, Uttering threats	**Calgary Sun**	**Federal prisoner - Alberta -psych Dangerous offender.**
		Hamilton Locke Street Vandalism	CBC	Vanier for women (provincial) is out
		Second Degree Murder	**Ottawa Citizen**	**Federal - Quebec - is out and living as a woman - Butcher of Gatineau**
		Pedophila & rape Dangerous offender	**Child Molester Database**	**Federal.**
		Sexual assault & sexual interference	**Global News**	**From London, On. Held at Vanier for women. I believe he got off charges**
[redacted]		Manslaughter	Toronto Sun	Is out and living in Toronto I think on bail for appeal possibly - wants to transfer.
		Sexual Assault	**The Chronicle Herald**	**5 month conditional sentence and 18 months probation. Nova Scotia**
		Child Sex Offender	**Women Are Human**	**Surrey British Columbia**
		Weapons Assault Predator	**Washington Examiner**	**Langley British Columbia**
		Manslaughter Beat an old woman to death	**CBC Winnipeg**	**Federal - Spent 10 years in male prisons.**
		Second Degree Murder	CBC	Federal prisoner - Is a lifer and did 9 years in Drumheller and was transferred to Edmonton

			CBC	for women. Then went to the healing lodge where he sexually assaulted a prisoner and is now transferred back to Edmonton for women.
[redacted]		Second Degree Murder		Federal prisoner - Fraser Valley - is in his 40's - Sask or Manitoba. Long sentence he was out and now back.
		Second Degree Murder		Federal prisoner - Fraser Valley - in late 60's. Either Brian or Brandon possibly last name White if not Armstrong.
		Repeat Sex Offender Dangerous Offender	**tvanouvelles**	**Federal prisoner - The SHU for a long time, then Stony Mountain and got beat up then transferred to Sask pen. Just got transferred from Sask pen to Millhaven on September 23, 2020. Wants to transfer to women's prison**
		Robbery, weapons, kidnapping	Global News	Federal prisoner - In Grand Valley was transferred from Joliette. He says he is a "hermaphrodite." Has been in and out for decades. 4th time federal prisoner. Women report issues with drugs & harassment.
		Unknown		Federal prisoner - At RTC (Pacific Institution) dating [redacted] in RTC.
		Unknown		Federal prisoner - At RTC Pacific
		Unknown	Cape Breton	Federal - Nova Institute for women on hormones wants to have sex change. Rumoured to have impregnated a female prisoner who had twins.
		Aggravated Assault		Federal prisoner - 25 year old at Grand Valley.
[redacted]		**Pedophile Child pornography**	**Guelph Mercury Tribune**	**Federal prisoner - Was 45 in 2019 and is from Guelph, Ontario. Found guilty in 2019 and started identifying as a woman just before sentencing. Was on probation for similar charges at the time of the offence. 9 years. Is not at GVI**
		Possession & making child pornography available	**CanLii**	**3 years house arrest Alberta**
		Assaults, indecent act, breaches, molesting a person	**CanLii**	**Secure Treatment Unit 34 years old.**
		Break and Enter Possession of Stolen Property Theft of a Motor Vehicle Trafficking in Stolen Property Breach	CanLii	Located in Alberta.
		Drug related	CanLii	Located in Alberta.
		Unknown	CanLii	Ontario - Provincial

[redacted]	Arson with disregard for human life	CanLii	Grew up in Toronto. Rpeatedly found to be unfit.
	Robbery, assault w weapon, failure to comply		Is wanted by Victoria B.C., Crime Stoppers on March 16, 2021, and is identified as a female and 38 years old.
	Assault with a weapon, assault, break and enter, possession of stolen goods, and the possession of drugs for trafficking, along with uttering threats, multiple breaches of probation and minor thefts.	Canlii Infotel	Provincial Surrey Pretrial
	Rape, assault, malicious damage, trespassing, theft, possession of narcotics and marijuana, breaking and entering, and assault causing bodily harm	**CanLii**	**On January 26, 1976, was committed to Oak Ridge after perpetrating a violent rape when he was a 20-year old male. He was discharged on February 23, 1979, and then returned from January 1981 until July 1984. Diagnosed with psychopathy in combination with gender identity issues and paraphilias. Changed his name around 2002.**
	Unknown		At EIFW
	Second Degree Murder	CanLii	BC In 2012 sentenced to life imprisonment without eligibility for parole for 12 years
	Sexually assaulted daughter over a period of time	**CanLii**	**Time of the offences, identified as male. The appellant now self-identifies as female and will be referred to as she/her where the context requires. Alberta.**
	assault causing bodily harm	CanLii	Unknown.
	Dangerous Offender several sex offensives	**News 1130**	**In Edmonton men's prison in max trying to get a transfer to a women's prison. Human rights claim & CAEFS and Efry are reportedly helping him.**