



British Columbia
Human Rights
Tribunal



FORM 1.1 – INDIVIDUAL COMPLAINT

Use This Form to File Your Own Complaint

Case

Case Number: CS-018722

Date Received: 2026-04-11

Step 1 - Party Information

Who experienced discrimination (Complainant)?

Legal name – First name: Jessica

Legal name – Last name: Simpson

Preferred name – e.g. traditional name, nickname, alias:

Use my preferred name: When talking to me, When writing to me, In decision in addition to my legal name

Title: Ms.

Pronoun: She

Complainant's address for delivery

Mailing address: [REDACTED]

Phone number: [REDACTED]

Cell: N/A

Fax: N/A

Email: [REDACTED]

Respondent contact information

Name of the Respondent: Culture Guard

Relationship to you (For example, your employer): none

Respondent Contact Email: [REDACTED]

Mailing Address:
[REDACTED]

Phone: N/A

Cell: N/A

Fax: N/A

Steps 2A - Areas of Discrimination & Step 2B -Grounds of Discrimination

Area: Publication

Ground

Sex: The Complainant is a woman, and her sex is a protected characteristic under the Human Rights Code (British Columbia)

Gender Identity or Expression: The Complainant is a transgender woman whose gender identity and expression are protected characteristics under the Human Rights Code (BC)

Sexual Orientation: The Complainant identifies as a member of the MMIWG2SLGBTQQIPPSAA+ community, and her sexual orientation as a lesbian constitutes a protected ground

Indigenous Identity: The Complainant is a Métis woman, and therefore an Indigenous person within the meaning of Canadian law and policy frameworks

Ancestry: The Complainant is of Métis ancestry, reflecting a distinct Indigenous lineage recognized within Canada's constitutional and legal framework

Colour: The Complainant is a Métis woman of Indigenous heritage, and therefore a racialized individual whose lived experience is shaped as such

Race: The Complainant is a Métis woman, and therefore a racialized Indigenous person within the meaning of Canadian law including the protections afforded

Physical Disability: The Complainant lives with multiple physical disabilities, including Type 1 diabetes, postural orthostatic tachycardia syndrome (POTS)

Mental Disability: The Complainant experiences mental health-related disabilities, including conditions that require ongoing psychological support and accommodation.

Step 3 - Details of the Discrimination

Details of the Discrimination for each Respondent

Respondent Name: Culture Guard

Describe the harm you experienced in a few words: The Respondent's publication caused profound harm to the Complainant's dignity, identity, and psychological well-being. By publicly misgendering the Complainant and characterizing her identity as illegitimate, the Respondent engaged in a form of existential denialism—a repudiation of her personhood that strikes at the core of her legally recognized status as a woman. This was not a private or isolated incident; it was disseminated in a public forum, thereby exposing the Complainant to widespread ridicule, delegitimization, and reputational damage. The harm is further intensified by the Respondent's deliberate mockery of the MMIWG2SLGBTQQIPPSAA+ community, of which the Complainant is a member. This conduct situates the attack within a broader framework of systemic discrimination against Indigenous and gender-diverse individuals, reinforcing narratives that contribute to marginalization, exclusion, and vulnerability. For the Complainant, this is not merely offensive expression.

Explain how the harm relates to the grounds you have selected before: The harm experienced by the Complainant is directly and causally connected to the protected grounds identified, namely gender identity or expression, sex, Indigenous identity, race, ancestry, colour, sexual orientation, and disability (both perceived mental and physical). The Respondent's conduct does not operate in a neutral or generalized manner; rather, it targets the Complainant precisely because of these intersecting characteristics, thereby satisfying the legal requirement of a nexus between the harm and the protected grounds under the Human Rights Code (British Columbia).

Describe what this Respondent did that harmed you.

Date: 2026-04-11

Conduct: On or about April 11, 2026, the Respondent, operating through a public social media account, knowingly authored and disseminated a publication targeting the Complainant that constitutes discriminatory expression within the meaning of section 7 of the Human Rights Code (British Columbia). The publication was not spontaneous, inadvertent, or benign; rather, it was deliberately constructed, rhetorically organized, and publicly broadcast with the foreseeable consequence of exposing the Complainant.

Date: 2026-04-11

Conduct: to hatred, contempt, and social exclusion. The Respondent intentionally misgendered the Complainant, repeatedly referring to her using male identifiers and explicitly denying her identity as a woman. This conduct was accompanied by language framing the Complainant's gender identity as "confusion," "fabrication," or "delusion," thereby constituting a direct repudiation of her legally recognized gender identity.

Date: 2026-04-11

Conduct: Such conduct amounts to existential denialism, in that it seeks to negate the Complainant's personhood and exclude her from recognized social and legal categories. Further, the Respondent mocked, distorted, and weaponized the acronym "MMIWG2SLGBTQQIPPSAA+", a term associated with a highly vulnerable and protected community.

Date: 2026-04-11

Conduct: The Respondent assigned derogatory, defamatory, and demeaning meanings to each component of the acronym, thereby transforming a framework of identity and recognition into an instrument of ridicule. This act was not merely offensive; it was calculated to undermine the dignity and legitimacy of the Complainant and the broader community with which she identifies.

Date: 2026-04-11

Conduct: The Respondent also characterized the Complainant as mentally unstable or “reality challenged,” thereby invoking stigmatizing narratives associated with mental disability. This constitutes discrimination on the basis of perceived disability, as it attributes pathology to the Complainant in order to discredit and dehumanize her.

Date: 2026-04-11

Conduct: The publication was made in a public and widely accessible forum, thereby amplifying its impact and facilitating further harassment by third parties. The Respondent knew or ought reasonably to have known that such content would invite ridicule, hostility, and potential threats, particularly given the well-documented risks faced by transgender and Indigenous individuals within digital environments.

Date: 2026-04-11

Conduct: Taken as a whole, the Respondent’s conduct represents a deliberate and sustained course of discriminatory publication, characterized by: • Intentional misgendering and denial of identity; • Public ridicule and delegitimization of a protected class; • Use of stigmatizing and pathologizing language; and • Amplification of harm through public dissemination.

Date: 2026-04-11

Conduct: This conduct is objectively and legally reprehensible, falling squarely within the category of expression that is likely to expose the Complainant to hatred, contempt, and systemic marginalization, and therefore constitutes a clear violation of the Human Rights Code.

Step 4 – Time Limit to Make Complaint

Respondent Name: Culture Guard

What is the date of the most recent conduct that you listed as discrimination in the previous step?

2026-04-11

Did the most recent conduct happen in the last year? Yes

Did all of the conduct happen in the last year for all Respondents: Yes

Step 5 - Other Proceedings

Do you have another proceeding about the same events? No

Step 6 - Remedies

Select the kinds of remedies you want that are available under s. 37 of the Human Rights Code:

- Order to stop the discrimination
- Declaration that the conduct is discrimination
- Compensation for injury to dignity, feelings, and self-respect
- Steps or programs to address the discrimination (examples: training, policy)
- Compensation for lost wages or other expenses such as moving expenses, photocopying, costs of attending the hearing (keep receipts)

Step 7 - Mediation

Do you want to attend a mediation? Yes