



British Columbia  
Human Rights  
Tribunal



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## FORM 1.1 – INDIVIDUAL COMPLAINT

Use This Form to File Your Own Complaint

### Case

Case Number: CS-018730

Date Received: 2026-04-12

## 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**

**I want to name the organization that discriminated against me: Yes**

**Name of the Respondent: Culture Guard**

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

**Respondent Contact Email:** [REDACTED]

**Mailing Address:**  
[REDACTED]

**Phone: 2507556777**

**Cell: N/A**

**Fax: N/A**

**Name of the Respondent: Kari Simpson**

**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: I am female. The Respondent's repeated use of male pronouns ("he," "his") and framing of the Complainant as male constitutes discrimination**

**Gender Identity or Expression: The Complainant is a transgender woman. The Respondent repeatedly and deliberately refers to the Complainant using male pronouns ("he," "his")**

**Sexual Orientation: The Complainant identifies as a lesbian and as a member of the MMIWG2SLGBTQQIPPSAA+ community. Respondent's used quotation marks around Lesbian**

### 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 constitutes a multi-axis attack on identity, combining misgendering, racial invalidation, and disability-based stigmatization into a single, highly public communication. The repeated use of male pronouns ("he") operates as a deliberate denial of the Complainant's gender identity, producing acute psychological distress and reinforcing broader societal patterns of transphobic exclusion. Further, the characterization of the Complainant's Indigenous identity as "mythical" constitutes a profound form of racial harm. For Indigenous individuals, identity is not merely personal but is tied to collective recognition, cultural continuity, and legal status. The Respondent's statements therefore inflict harm not only at an individual level but also within a broader socio-political context of ongoing Indigenous erasure.**

**Explain how the harm relates to the grounds you have selected before: The harm experienced by the Complainant is inextricably and causally connected to the protected grounds identified above, namely sex, gender identity or expression, sexual orientation, Indigenous identity, and disability. The Respondent's conduct is not neutral or generalized commentary; rather, it is explicitly directed at, and contingent upon, these protected characteristics. The repeated use of male pronouns ("he," "his") arises solely because the Complainant is a transgender woman. But for her gender identity, such mischaracterization would not occur. This establishes a direct nexus between the discriminatory act and the protected ground of gender identity or expression, as well as sex. Further, the Respondent's assertion that the Complainant's identity as a Métis woman is "mythical" constitutes a form of racialized and Indigenous identity denial.**

**Describe what this Respondent did that harmed you.**

**Date: 2026-04-12**

**Conduct: The Respondent, CultureGuard and Kari Simpson, engaged in discriminatory publication and communication by disseminating a public statement that targets and undermines multiple protected characteristics of the Complainant in a deliberate and coordinated manner.**

**Date: 2026-04-12**

**Conduct: Specifically, the Respondent repeatedly referred to the Complainant using male pronouns ("he," "his"), despite the Complainant being a transgender woman. This constitutes intentional misgendering and a direct denial of her gender identity and expression**

**Date: 2026-04-12**

**Conduct: The Respondent further placed identity markers—including "Indigenous," "Métis," "Woman," "Lesbian," and "Mentally and Physically disabled"—in quotation marks, thereby signaling disbelief, mockery, and an assertion that these identities are fabricated or illegitimate.**

**Date: 2026-04-12**

**Conduct: The Respondent escalated this conduct by characterizing the Complainant's identity as "mythical" and "self-declared," which functions as a form of racialized and gender-based identity invalidation. This language is not neutral commentary; it is dismissive, pejorative, and intended to strip the Complainant of credibility and dignity.**

**Date: 2026-04-12**

**Conduct: The framing of the Complainant's lived experience as merely something "shaped as such" further trivializes and delegitimizes her identity across multiple protected grounds.**

**Date: 2026-04-12**

**Conduct: This conduct was carried out in a public forum, thereby amplifying the harm and exposing the Complainant to further harassment, ridicule, and reputational damage. The cumulative effect of these actions constitutes a poisoned environment and reflects a pattern of existential denialism, wherein the Respondent persistently repudiates the Complainant's legally recognized identity.**

**Date: 2026-04-12**

**Conduct: In sum, the Respondent's actions amount to discriminatory conduct contrary to the Human Rights Code (British Columbia), engaging the protected grounds of gender identity or expression, sex, sexual orientation, race/Indigenous identity, and disability through intentional, public, and harmful communication.**

**Respondent Name: Kari Simpson**

**Describe the harm you experienced in a few words: Same content as CultureGuard, but posted on Kari Simpson Facebook**

**Explain how the harm relates to the grounds you have selected before: Same content as CultureGuard, but posted on Kari Simpson Facebook**

**Describe what this Respondent did that harmed you.**

**Date: 2026-04-12**

**Conduct: Same content as CultureGuard, but posted on Kari Simpson Facebook**

#### **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?  
2026-04-12**

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

**Respondent Name: Kari Simpson**

**What is the date of the most recent conduct that you listed as discrimination in the previous step?  
2026-04-12**

**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:**

- **Declaration that the conduct is discrimination**
- **Order to stop the 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**

## **Step 8 - Indigenous Peoples**

**I confirm I am First Nations, Métis or Inuit. I want an Indigenous Navigator to contact me about the process.**