# 03

# CHALLENGING PROSTITUTION LAWS: *BEDFORD V. CANADA*

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THIS INFOSHEET IS PART OF A SERIES OF 5 PRODUCED BY STELLA IN COLLABORATION WITH ALLIES TO EDUCATE AND MOBILIZE COMMUNITIES AROUND LEGAL ADVOCACY AND DECRIMINALIZATION OF SEX WORK.

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> *(…) This case is about whether the Charter of Rights and Freedoms will tolerate criminal prohibitions that contribute to the risk of violence and death faced by a vulnerable segment of the population… It speaks to the quality of life – and the ability to live – of thousands of women and men in our communities. It speaks to the duties that our society owes to those of us who live in precarious positions. It is about our responsibility for the harms we cause when we seek to criminalize conduct that some find distasteful. It is about whether or not we believe that sex workers are people deserving the same rights and dignity as the rest of the public.*
>
> - Plaintiffs' Memorandum *Bedford v. Canada* 2012

## 1 WHAT IS *BEDFORD V. CANADA*

In 2007 in Ontario, Canada, three sex workers (the applicants: Terri-Jean Bedford, Amy Lebovitch and Valerie Scott) launched a *Charter* challenge against the Canadian federal government. To learn more about these brave women who are challenging the prostitution laws, see Stella's Constellation: Human Right's Issue.

They are challenging three sections of the Canadian Criminal Code that criminalize fundamental activities and relationships related to prostitution.

Two decisions have been made, first by the Ontario Superior Court of Justice and second by the Ontario Court of Appeal. The next step is for these decisions to be revisited at the Supreme Court of Canada (SCC). This is expected to take place on June 12th, 2013.

The SCC decision will be final and will apply to all provinces and territories in Canada. Until then these three laws remain in force and can still be used to arrest and prosecute sex workers, third parties and clients.

### THE FOLLOWING THREE PROSTITUTION LAWS ARE BEING CHALLENGED:

CC s. 210: Bawdy-House Laws make it illegal for a sex worker, client, or third party to operate or be found in a place that is used for prostitution. Specifically, it is illegal for sex workers and third parties to use, rent or own a space that is used more than once for prostitution. The term third party refers to an individual who supervises, controls, supports or coordinates some aspects of another sex worker's sex work, for direct or indirect financial compensation. Sex workers can also be considered third parties if they are profiting off the sex work of another worker. This law also makes it illegal for someone to provide a space to a sex worker (e.g., landlord, manager).

CC s. 212(1)(j): Living on the Avails is often called the "pimping law". It criminalizes third parties in prostitution – in other words, a person who has a work-related relationship with a sex worker. This law makes it illegal for third parties to take any earnings from a sex worker if they are also providing a service related to their work - for example, running an agency, booking clients, or offering protection.

It may also criminalize the person who lives with a sex worker. In this context, the person charged needs to prove that the relationship is not "exploitative". However, in a labour relations context – anyone who takes any money for providing a service to a sex worker can be charged under this law, no matter how equitable or "exploitative" the relationship.

CC s. 213(1)(c): The Communicating Law makes it illegal for sex workers, clients and third parties to communicate about the exchange of sex for money in a public place, including a private vehicle – this includes talking about services, prices, conditions, practices or other limits or boundaries.

This law targets sex workers and clients in public spaces — sex workers who work on the street are the most frequently prosecuted. Sex workers who work on the street are therefore continuously trying to dodge cops and avoid arrest, which means we are displaced into more isolated areas and not working in proximity to each other. This law threatens almost all sex workers in every sector of the industry as our capacity to communicate and negotiate is compromised.

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THIS CASE IS ABOUT WHETHER THESE THREE CRIMINAL LAWS RELATED TO PROSTITUTION WILL BE REMOVED FROM THE *CRIMINAL CODE* OF CANADA. BEYOND THAT, THE CASE IS ABOUT DIFFERENT THINGS TO DIFFERENT PEOPLE:

- Moving towards decriminalization, which also means different things to different people. For Stella, decriminalization means the removal of all criminal laws that prohibit selling, buying or facilitating (procuring) sex work.
- Advancing sex workers' fundamental rights: the right to share our earnings with whomever we choose; the right to contract for services; the right to determine and communicate the conditions and contexts in which we have sex; the right to discuss working conditions; the right to access existing labour protections; and the right to live free from fear that we can be criminally prosecuted because of the work we do.
- Invalidating laws that are one of many systemic tools that contribute and reinforce inequality, disadvantage and discrimination based on class, race, gender, citizenship status, mobility and mental health.
- Individual rights such as privacy rights, and the right to sexual autonomy and protection from government interference "in our bedrooms."
- The coherency of the law: The bawdy-house law says we can't work indoors while the communicating law prevents us from working outdoors.
- For Stella, this case is about all of these realities, and more…

POSSIBLE OUTCOMES OF *BEDFORD V. CANADA*:

If sex workers win this case entirely, the laws will be "struck-down" – meaning they will be removed from the *Criminal Code* and police will no longer be able to use these laws to arrest sex workers, clients or third parties.

If sex workers lose the case, the laws will remain in the *Criminal Code* and will continue to be used to arrest us, the people we work with and the people who buy our services. Moreover, if the court decides that these laws are constitutional, we would not be able to challenge these same prostitution laws using the *Charter* rights used in *Bedford*. A completely new *Charter* challenge would need to be launched, one that would use a different *Charter* right, for example the s. 15 equality right. Also, this decision could reinforce public perspectives that legitimize the discrimination and stigma faced by sex workers.

Finally, the decision could be a messy mix of both: The SCC could "strike-down" some of the laws, keep others in effect, or modify them.

All people in Canada have certain rights that are protected by the *Canadian Charter of Rights and Freedoms* (*Charter*). If a government law or action violates an individual's protected *Charter* right, the person whose right is violated can try to initiate a *Charter* challenge. This means taking the government responsible for the law or action to court.

The individual or group who launches the *Charter* challenge is called the plaintiff(s) or applicant(s). The plaintiff(s) has to demonstrate in court how the challenged law or practice violates their *Charter* right(s). At the base of every challenge is a specific law(s) or practice that is contested and a specific *Charter* right(s) that the plaintiff(s) considers to be violated.

For more information on *Charter* Challenges, see Stella's Info-Sheet: Sex Work and the *Charter*.

In the *Bedford* case, the laws being challenged are criminal laws. In Canada criminal laws are federal – which means the same criminal laws apply in all provinces and territories across Canada. In the *Bedford* case the applicants sued the federal government, as they are responsible for the criminal laws.

PROSTUTION LAWS IN THE CANADIAN *CRIMINAL CODE* CHALLENGED IN *BEDFORD v. CANADA*

| | |
|---|---|
| CC s. 210(1)<br>**Keeping a common bawdy-house** | Everyone who keeps a common bawdy-house is guilty of an indictable offence and liable to imprisonment for a term not exceeding two years.<br>Landlord, inmate, etc.<br>(2) Everyone who<br>(a) is an inmate of a common bawdy-house,<br>(b) is found, without lawful excuse, in a common bawdy house, or<br>(c) as owner, landlord, lessor, tenant, occupier, agent or otherwise having charge or control of any place, knowingly permits the place or any part thereof to be let or used for the purposes of a common bawdy-house, is guilty of an offence punishable on summary conviction. |
| CC s. 212(1)(j)<br>**Procuring** | CC s. 212(1)(j) Everyone who lives wholly or in part on the avails of prostitution of another person, is guilty of an indictable offence and liable to imprisonment for a term not exceeding ten years. |
| CC s. 213(1)(c)<br>**Offence in relation to communication** | Every person who in a public place or in any place open to public view stops or attempts to stop any person or in any manner communicates or attempts to communicate with any person for the purpose of engaging in prostitution or of obtaining the sexual services of a prostitute is guilty of an offence punishable on summary conviction. |

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## LEGAL ARGUMENTS IN *BEDFORD V. CANADA*

To claim a *Charter* right violation — which is the basis of a *Charter* challenge — the plaintiff has to identify a *Charter* right that they say is violated by the challenged law or government action.

Sex workers in *Bedford v. Canada* claim that three criminal prostitution laws (ss. 210, 212(1)(j) and 213(1)(c) of the *Criminal Code*) violate two of their *Charter* rights (s. 7 and s. 2(b)).

### THE CHALLENGE IS BASED ON FOUR CLAIMS:

1) All 3 prostitution laws violate sex workers' section 7 Charter right to liberty and security of the person;

2) These Charter violations are not in accordance with the principles of fundamental justice (part of the test built into s. 7 of the Charter);

3) The Communicating Law (s. 213(1)(c)) violates sex workers' section 2(b) Charter right to freedom of expression; and

4) These violations of sex workers' right to liberty, security of the person and freedom of expression are not justified in a "free and democratic society" (the test of s. 1 for the Charter).

Therefore, the plaintiffs argue that these laws are unconstitutional and should be "struck down" – taken out of the *Criminal Code* and no longer be in force or effect.

### 1) PROSTITUTION LAWS VIOLATE SEX WORKERS' SECTION7 CHARTER RIGHT TO LIBERTY AND SECURITY:

Section 7 of the *Charter* says: Everyone has the right to life, liberty and security of the person and the right not to be deprived thereof except in accordance with the principles of fundamental justice.

Prostitution laws force sex workers to choose between our right to liberty and our right to security — whereas s. 7 of the *Charter* says that both of these rights are protected by the *Charter*.

We are forced to break the law and risk arrest and incarceration in order to do the things that increase our security and improve our working conditions. For example, if we communicate our prices and limits with clients, bring clients into an indoor location that we control, or engage a third party (i.e., manager, partner, agency owner, brothel keeper, booker, receptionist, agent, driver) to book our meetings with clients or provide some level of security, we "put our liberty at risk" as we risk going to jail.

We are forced to sacrifice our physical and sexual autonomy -- to decide what we do with our bodies, who we have sex with and under what conditions (including whether we exchange money or not). But in this case, the only liberty right that the court has recognized is the right to be free from arrest and incarceration. If we cannot be arrested for prostitution itself, we should not be arrested for the actions and relationships that allow us to establish safer and more secure working conditions.

Both of the Ontario courts agreed that the three prostitution laws violate sex workers' s. 7 *Charter* right to security and liberty. However, the courts also need to determine if a violation is "acceptable" according to the principles of fundamental justice.

### 2) THESE CHARTER VIOLATIONS ARE NOT IN ACCORDANCE WITH THE PRINCIPLES OF FUNDAMENTAL JUSTICE:

If the court decides that a law violates sex workers' s. 7 *Charter* right, they don't immediately strike down that law or try to fix it. They need to decide if that violation is "acceptable" according to the principles of fundamental justice (PFJ).

PFJs are notions that the court has created over time. The three PFJs raised in this case are:

- Arbitrariness
- Overbreadth
- Gross Disproportionality (GD)

If the plaintiff can prove that the challenged law violates even one PFJ, then the law can be struck down or modified so that it no longer violates the plaintiff's *Charter* right (or at least it minimizes the violation to a level that is acceptable to the court).

All judges at both levels of the Ontario courts agreed that the three prostitution laws violate sex workers' s. 7 right to security and liberty. But their final decisions were based on their analysis of the PFJs.

Here are the three current interpretations of the challenged laws' objectives:

S. 210:
Combating neighbourhood disruption and safeguarding public health and safety

S. 212(1)(j):
Preventing the exploitation of prostitutes, and pimps profiting from prostitution

S. 213(1)(c):
Curbing social nuisance.

When deciding whether a law violates a PFJ, you look at the initial objective of the law – the reason why the law was created in the first place.

Many people have the misconception that the criminal laws around prostitution exist to protect prostitutes. None of the three laws being challenged, including living on the avails, were originally created for this purpose. The original objective of s. 212(1)(j) was to criminalize everyone who had an economic relationship with a prostitute. Only since the 1960s has this law been interpreted as "the protection of prostitutes from the profiteering of pimps".

### PFJ #1: ARBITRARY:
Is the law unrelated to or inconsistent with the law's objective?

When the court is deciding whether a s. 7 violation is acceptable, they consider whether the effect of the law is unrelated to or inconsistent with the law's objective.

Meaning: does the law criminalize behaviours that have nothing to do with its goals?

In the Ontario Superior Court decision (the first decision), Justice Himel ruled that prostitution laws in and of themselves are not arbitrary but they are arbitrary when looking at how they function together.

For example, the bawdy-house law says we can't work indoors while the communicating law prevents us from working outdoors.

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PFJ #2: OVERBROAD:
Does the law criminalize activity beyond what it is intended to prohibit?

For example, the current interpretation of the objective of s. 212(1)(j) is said to be the protection of prostitutes from abusive and exploitative third parties. But the effect of the law is that it also criminalizes third parties that are helpful and desirable for sex workers. This prevents sex workers from legally entering into work relationships that enhance our safety.

From this perspective the provision is overbroad: It captures a wide range of relationships beyond what it was intended to, and in doing so it actually increases the vulnerability of the people it intends to protect.

PFJ #3: GROSSLY DISPROPORTIONATE (GD): Are the effects of the law grossly disproportionate to the law's objective?

In other words: If the resulting effects of the *Charter* violation are drastically more severe than the behaviour that the law intends to prevent in the first place, the law cannot be justified. The GD test happens in three stages.

FIRST, the court looks at the impacts of the *Charter* violation. They ask: How severe are the impacts of the law on sex workers' s. 7 right to safety and security?

For example, s. 213 forces sex workers who work on the street to work alone and in isolated locations as we try to avoid police and arrest, and it prevents all sex workers from communicating explicitly and effectively when establishing and negotiating services, conditions, safety and prices with clients.

These are all very serious impacts that have devastating consequences on our safety and security – such as increasing our risk of being killed, confined, robbed, physically assaulted and sexually assaulted – in other words these impacts are grave violations of our s. 7 right to security.

SECOND, they evaluate the impacts of the behaviour that the law intends to prohibit (this is the same thing as the law's objective): For example, s. 213 was intended to control the "social nuisance" associated with street prostitution, such as street noise, unwanted advances by clients, littered condoms and "public displays of prostitution."

THIRD, they "weigh" these impacts: balancing the impacts of sex workers' *Charter* violations against the impacts of the "social nuisance."

We hope that the SCC will decide that any law that contributes to the number of deaths, confinements, thefts, physical assaults and sexual assaults experience by one group of people — in the name of decreasing street noise, unwanted advances, and moral discomfort experienced by another group of people — is not acceptable and must be struck down.

3) THE COMMUNICATING LAW (S. 213) VIOLATES CHARTER SECTION 2(B): RIGHT TO FREEDOM OF EXPRESSION

Section 2(b) of the *Charter* includes the right to freedom of expression. Sex workers argue that s. 213(1)(c) of the *Criminal Code*, which prohibits us from communication for the purpose of prostitution, violates sex workers' s. 2(b) *Charter* right.

This question was before the SCC in 1990. The SCC decided at this time that the communication law violated sex workers' s. 2(b) right to freedom of expression but upheld the law. For more on this previous decision see Stella's InfoSheet: Sex Work and the *Charter*.

In the *Bedford* case Justice Himel agreed with the SCC's 1990 conclusion that the communication law violated sex workers' right to freedom of expression. However, Justice Himel disagreed with the 1990 decision in the following way: unlike the SCC in 1990, Justice Himel concluded that this violation was not justified (meaning that it cannot "be saved by s. 1" – this is explained more in the next section).

Ontario's appellate court, the Ontario Court of Appeal (ONCA), did not engage with the question. They refused to decide on this issue as the SCC had already made a decision on this issue in 1990 – and only the SCC can overturn a SCC decision. When the *Bedford* case is heard by the SCC in 2013, the SCC will be able to revisit their previous decision regarding the communicating law, and whether it violates our right to freedom of expression. At this point, they will be able to decide whether s. 213(1)(c) violates s. 2(b) of the *Charter*.

4) THIS VIOLATION OF SEX WORKERS' RIGHT TO LIBERTY AND FREEDOM OF EXPRESSION IS NOT JUSTIFIED IN A "FREE AND DEMOCRATIC SOCIETY" (THE TEST OF S. 1 FOR THE CHARTER).

Section 1 of the *Charter* states: The Canadian *Charter* of Rights and Freedoms guarantees the rights and freedoms set out in it subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society.
In other words, proving that a certain law or government action violates a *Charter* right is not enough to force the government to change it, if the government decides that the *Charter* violation in question is "justified in a free and democratic society."

So even if the government agrees that a certain law or government action violates a *Charter* right, they still have the power to say that it's "justified" under s. 1, and therefore not unconstitutional.

In the *Bedford* case, the question will be: Is the violation to sex workers' right to freedom of expression that is caused by the communication law "justified in a free and democratic society" (justified under s. 1)?

When deciding whether the violation of a right is justified under s. 1, the court asks two questions. The first question is whether the objective of the law is "related to concerns which are pressing and substantial in a free and democratic society". In other words, do they think the objective is important enough to justify someone's *Charter* violation? Second, they ask whether "the means chosen are reasonable and demonstrably justified" and proportionate to their effects. Basically – are the ways in which the law regulates people justifiable? Their analysis here is very similar to the three PFJs analysis described above.

As previously discussed, two decisions have been made, first by the Ontario Superior Court of Justice and second by the Ontario Court of Appeal.

These previous decisions frame the way that the SCC will hear the case in June 2013. The SCC will not hear the case from scratch but rather will analyze the prior decisions. The arguments that parties and interveners to the case will make at the SCC will be framed as responses to the Court of Appeal and Superior Court's decision.

## DECISION #1
## ONTARIO SUPERIOR COURT OF JUSTICE

*All three laws deemed unconstitutional.*

Justice Himel ruled that all three laws violated sex workers' s. 7 rights and that they violated PFJs. She then struck down s. 212(1)(j) and s. 213(1)(c), and modified s. 210 so that it no longer applied to prostitution; she did this by striking out the word prostitution from s. 197 of the *Criminal Code* because the Bawdy-House laws are based on the definition of "common bawdy-house" in s. 197.

Justice Himel also found that s. 213(1)(c) (the communication law) violates sex workers' s. 2(b) right to freedom of expression and could not be "saved" by s. 1.

For more information on the 1990 Reference case, see Stella's InfoSheet: Sex Work and the *Charter*.

In short, she decided that all three prostitution laws could no longer be used to arrest people involved in sex work as they threaten, rather than protect, sex workers' safety and security.

## DECISION #2:
## ONTARIO COURT OF APPEAL (ONCA)

### Re s. 210:
### No longer in effect to arrest people involved in prostitution.

As with Justice Himel, the ONCA struck prostitution from s. 197 of the *Criminal Code* – meaning that sex workers and clients could no longer be arrested for providing or purchasing sexual services in an indoor location used for the purposes of prostitution ("bawdy-house"). The ONCA reasoning was the same as Justice Himel's: sex work is safer when conducted indoors and in a location where sex workers have a greater degree of control over their environment.

### Re s. 212(1)(j):
### Read new language into the law, limiting the situation in which it can be used to arrest third parties.

Unlike the first decision, the ONCA did not strike down s. 212(1)(j). Rather, they added four words to the provision – "in circumstances of exploitation". This process of adding words to an already existing law is called "reading-in". So the law would now be:

"Everyone who lives wholly or in part on the avails of prostitution of another person in circumstances of exploitation is guilty of an indictable offence."

This means that:

- The state can continue to control both sex workers' personal and work relationships through criminal sanctions – but with somewhat more restrictive parameters;
- The presumption in s. 212(3) of the *Criminal Code* may remain in effect (this will depend on the SCC's s. 212(1)(j) decision). This presumption means that in cases where a person "lives with or is habitually in the company of a prostitute," the burden will not be on the prosecutor to prove that there is exploitation, but will be on the accused to prove that there is not. When a presumption like this exists, the accused is not "innocent until proven guilty", but rather the accused has the burden of providing evidence that proves that there is no "exploitation".
- The Court will ultimately decide what exploitation is in sex work.

s. 212(3) of the *Criminal Code*: (3) Evidence that a person lives with or is habitually in the company of a prostitute or lives in a common bawdy-house is, in the absence of evidence to the contrary, proof that the person lives on the avails of prostitution, for the purposes of paragraph (1)(j) and subsections (2) and (2.1).

The ONCA decision continues to control sex workers' relationships through criminal laws, and perpetuates stigma that characterizes sex workers as unable to form relationships, unable to evaluate our own working conditions and our partners as being involved in organized crime and also in need of regulation through criminal law. It promotes the idea that sex work is so inherently dangerous and sex workers so inherently vulnerable that we need "special criminal protections" rather than existing labour standards and protections.

Much of the work that Stella does is aimed at addressing any exploitative and abusive working conditions for sex workers. We do this by creating spaces of empowerment where we can discuss our working conditions and share strategies to improve them, by denouncing violent incidents by aggressors that target us as sex workers, and by exchanging support and information about our rights, knowing we have little recourse due to criminalization.

- We argue that exploitative labour conditions should be addressed with labour regulations and protections – as is done for other forms of labour – and that the criminal law is not an effective or appropriate way to regulate the sex industry.
- Other laws that exist to prohibit physical assault, sexual assault, threats, harassment, murder, domestic violence, extortion, theft and kidnapping are rarely used by sex workers because we are criminalized. In addition, our criminalized status – that leads us to rarely report crimes against us – makes us targets for predators. When we are no longer written into law as criminals, we will have greater access to the police and criminal justice system in the event that we experience injustice, discrimination or violence and want access to recourse.
- Third parties are essential for many sex workers to be able to establish safer working conditions, and this case needs to consider all actors involved in improving our workings conditions and increasing our safety and security.
- Sex workers are best positioned to understand and determine what relationships we want to establish and maintain, not the courts or the prosecutors.

### Re s. 213(1)(c):
### Upheld - This law can still be used to arrest sex workers and clients.

The ONCA decided this law remains in the *Criminal Code* as is, and sex workers and clients will continue to be arrested and prosecuted under this law. They agreed that the law violated our s. 7 *Charter* right but they decided that it did not violate any PFJs. Specifically they decided that the impacts were not "grossly disproportionate," which is the legal argument that most accurately reflects our needs. Unlike Justice Himel, the ONCA said that the negative impact of "public nuisance associated with street prostitution" is more severe than the impact that this law has on sex workers' safety and security.

This decision is devastating to our community and demonstrates a complete disregard for

the rights' violations of sex workers who live and work in the most difficult conditions, and who are most frequently prosecuted under this law. It is noteworthy that two judges dissented, meaning that two of the five judges wanted s. 213(1)(c) to be struck down.

Here are factors that the ONCA majority decision either ignored or misunderstood:

- The ONCA misunderstood the range of the laws' impacts. They focused exclusively on the fact that this law prevents us from screening clients and ignored the other ways that it diminishes sex workers' safety as we try to dodge cops and avoid arrest. Impacts such as:
  - Displacing sex workers into more isolated and therefore unsafe areas;
  - Preventing us from working together, once again increasing our isolation; and
  - Preventing us from taking the time to screen vehicles before entering.
- They undervalued the importance of screening clients. This law prevents us from having the time to properly negotiate and communicate our limits to clients about services, prices, locations and safety practices. It is also these first moments of contact with a client where clients become more accountable to workers – we receive their name, their interests and other information about them so that we have an idea of whom we're engaging with.
- They refused to understand our s. 7 right through an equality analysis. They recognize that sex workers who work on the street are disadvantaged because of poverty, addiction, gender, race and age, and admit that this law contributes to some degree of harm. But they felt that the harmful effects of this law are diminished because of our poverty, addiction, gender, race and age, and cannot be quantified.

Not only does this law put us at greater risk of violence and stigma but it also:

- Places us at greater risk of negative treatment by police, potential employers, landlords, health care providers and members of the general public;
- It imposes additional barriers for sex workers who want to access services and stop doing sex work;
- It imposes additional barriers to the possibility of sex workers accessing labour protections, rights and entitlements; and
- It reinforces the idea that we are not valuable members of our neighbourhoods and that our voices and realities should not be respected and included, but rather that we are a "social problem" that needs to be regulated.

## 5 INTERVENERS IN *BEDFORD V, CANADA*

A *Charter* Challenge usually begins with two parties: the plaintiff(s) and a government. As the case moves along, different groups may join in as interveners. Interveners don't become a party in the case, but in most cases they become allied with the party they intend to support.

If a group wants to intervene they have to get permission from the court by convincing the court that they have an expertise in the area and will bring forward new and relevant arguments that will help the court understand the case. Although groups might have a similar and consolidated message or priority, each intervener has to "take on a new angle" or unique perspective if they want to be accepted as separate interveners. If they do not have a "unique perspective," and specifically if they do not have a unique legal argument, the court will most likely not allow them to intervene. Groups that take on the same perspective can try to intervene as one united coalition.

### GROUPS THAT HAVE INTERVENED IN BEDFORD SO FAR, AT THE ONTARIO COURT OF APPEAL:

In support of striking down all three laws:

Coalition:
- Providing Alternatives Counselling and Education Society (PACE)
- Pivot Legal Society (Pivot)
- Downtown Eastside Sex Workers United Against Violence (SWUAV)

Coalition:
- Maggie's Toronto Sex Workers Action Project
- Prostitutes of Ottawa Gatineau Work Educate Resist (POWER)

Coalition:
- Canadian HIV/AIDS Legal Network and British Columbia
- Centre for Excellence in HIV/AIDS
- British Columbia Civil Liberties Association (BCCLA)
- Canadian Civil Liberties Association (CCLA)

In support of upholding the laws (fully or in part):

Christian Legal Fellowship (CLF)
Catholic Civil Rights League (CCRL)
REAL (Realistic, Equal, Active for Life) Women of Canada
Coalition:
- Canadian Association of Sexual Assault Centres,
- Canadian Association of Elizabeth Fry Societies, Native Women's
- Association of Canada, Action Ontarienne Contre La Violence Faite Aux Femmes,
- Concertation des Luttes Contre L'Exploitation Sexuelle
- Regroupememt Québécois des Centres d'Aide et de Lutte Contre les Agressions à Caractère Sexuel
- Vancouver Rape Relief Society.

Other groups and provincial governments may intervene at the Supreme Court level.

## NEXT STEPS

The SCC will hear *Bedford* on June 12th, 2013. The decision at the Supreme Court level will be final and will impact sex workers across Canada.

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Stella is a community organization created and run by and for sex workers. At Stella we provide support and information to sex workers so that we may live and work in safety and with dignity.

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