

Clarifications to the 2024 Wilson Moot Problem

1. Canada has been granted leave to appeal to the High Court of the Dominion of Canada and is the appellant in that court. The style of cause is: *Canada (Minister of Public Safety and Emergency Preparedness) v. Ash Lacroix*.
2. The facts are as found by Justice Wolff, as stated in the Official Problem. Mooters may conduct any research they see fit in developing their arguments. Mooters are also permitted to refer to any domestic or foreign law in their written and/or oral arguments, subject to clarification #5 below. However, no reference shall be made, in written and/or oral arguments, to any legislative, social, or adjudicative facts beyond those found by Justice Wolff.
3. The High Court of the Dominion of Canada will not entertain submissions on any issues other than the three constitutional questions for which the Court granted leave. Mooters may raise any arguments relating to those issues that they see fit, regardless of whether they were referred to in the excerpts of the judgments below in the Official Problem. The only remedies sought by Ash are an order in the nature of *mandamus* compelling Ash's transfer to Eagle Lake Institution and damages under section 24(1) of the *Charter*.
4. The Parties are agreed that the standard of review is reasonableness, per *Doré v. Barreau du Québec*, 2012 SCC 12. Mooters are free to discuss the content of the standard of review and authorities relevant to it, but leave has not been granted to argue that the standard of review is anything other than reasonableness.
5. Regarding footnote 1 of the Official Problem, mooters may refer to any provision of the *Corrections and Conditional Release Act* in their written and oral arguments. Mooters shall not refer to any regulations, policies, or directives made under the *Corrections and Conditional Release Act* other than the Directive set out in Schedule "A" to the Official Problem.
6. The facts contained in paragraphs 1 to 19 and 22 to 23 of the Official Problem were known to Ms. Zhang when she made the Decision. The expert evidence described in paragraphs 20 to 21 of the Official Problem was not before Ms. Zhang but was admitted by Justice Wolff, with the consent of the Parties.
7. There is a typographical error in paragraph 18 of the Official Problem. The second sentence should read: "Pursuant to the Directive, Ash's Transfer Application was referred to the Regional Deputy Commissioner, Naomi Zhang, for a decision."