

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

CANADIAN ALLIANCE FOR SEX WORK LAW REFORM,  
MONICA FORRESTER, VALERIE SCOTT, LANNA MOON PERRIN, JANE X,  
ALESSA MASON and TIFFANY ANWAR

Applicants

- and -

HER MAJESTY THE QUEEN as represented by  
THE ATTORNEY GENERAL OF CANADA

Respondent

**AFFIDAVIT OF LANNA MOON PERRIN  
(Affirmed April 25, 2022)**

I, Lanna Moon Perrin, of the City of Toronto, in the Province of Ontario AFFIRM  
THAT:

1. I am an Applicant in the above-noted matter. I am an Anishinaabe artist, human rights advocate, and land defender. I co-founded Tribal Wizdom Productions – an all Indigenous hip-hop group promoting empowerment, unity, and resistance. I am a member of the Sex Workers Advisory Network of Sudbury, and have worked as a sex worker for many years, including under the *Protection of Communities and Exploited Persons Act* (“*PCEPA*”). As such, I have knowledge of the matters to which I hereinafter depose.

**Background**

2. I moved out on my own when I was sixteen. I did not have enough money to do anything. I was going to the soup kitchen to eat, and saw other girls who were doing sex work. I asked them about it. They told me all about the work that they did. That is when I started engaging in street-level sex work. I did it so that I could have a good pair of winter boots, food to eat, and enough money to pay rent. I did it to help sustain myself. I have

engaged in sex work throughout my life, and continue to do so to this day. I have been a sex worker for thirty years.

3. I now have four children. Sex work was particularly helpful when I was a single mom. Sex work allowed me to support my family and buy nice things for my children – new shoes, nice clothes, and pay for school field trips. Sex work allowed me to spend more time with my family. I didn't have to work forty five hours per week like other jobs. Instead, I set my own schedule. I worked the hours and time that made sense for me and my family. This was really beneficial for me as a mom.

4. I have engaged in a lot of community work and advocacy in my life, and I have not been paid for this work. Sex work allowed me to support myself as an advocate, and do the community work that I have always felt that I am called to do. I testified on my experiences in sex work to the National Inquiry into Missing and Murdered Indigenous Women and Girls. A copy of the transcript of my testimony is attached as **Exhibit "A"**.

5. While I have mostly sold sex for money, I have also at times exchanged sex for other things, like covering my rent. I have gotten tipped extras like money, food, clothes, and cell phones.

6. I have worked in many areas of the industry, including massage parlours, as an escort, and dancing. I was paid more in these areas of the industry. I have always felt safer and more protected when working indoors, because I am surrounded by other people unlike when I am working on the streets. But street-level sex work is always an easy fall back when I'm in need of work. About 40 percent of my career has involved street-level sex work, which I continue to do.

### **Sex Work and Human Trafficking Are Distinct Experiences**

7. Many of the sex workers that I know engage in sex work by choice. In my experience, however, some women become controlled by others because of the conditions that the criminal laws facilitate. As I explain below, the law forces us to work in isolation and darkness. Our ability to take basic safety measures is really limited. This harm is intensified by the criminalization of our work on the streets, the criminalization of our

clients, and the criminalization of third parties who might provide assistance. All of this makes us vulnerable to be preyed on by others.

8. I have felt some elements of control while working in the sex industry. When I was sixteen and working in Sudbury, a man had promised me a better life working in Toronto. I thought he had my best interests in mind. I had never been to Toronto before. So I willingly took this opportunity. But when I got there, I was being controlled by others. I was locked into a rundown room, where men were brought to me and I was told what to do with them. I was told when to work. And my movement was restricted. I received no money in return. I was being controlled and made to fear touching the doorknob. I remember being so scared. After a few days, I was able to escape. This experience was exploitation. I believe that I was being trafficked.

9. But the experience of being trafficked does not define sex work for me. Ever since I escaped, for decades, and to this day, I freely choose to do sex work. No one forces me to be a sex worker. When I sell or trade sex, I am not being trafficked. This is true even in the instances where I have experienced violence in my work, as described below. I still decide for myself to engage in sex work.

10. In my experience, sex work itself is not dangerous. However, sex work can become dangerous when it is criminalized and when sex workers like me cannot rely on others to help us take basic safety precautions. The law prevents me from stopping traffic to speak with clients, or from speaking with clients in many public places. My clients do not want to be seen with me because it is illegal for them to buy sex. When I work on the streets, my public interactions with clients are rushed and often meaningless. The law forces me to work in hiding, and often alone. The law pushes sex workers into darkness and into places where police do not go. And there are all kinds of people that sex workers encounter when we are pushed into these places. That is where we become more vulnerable.

11. If I didn't have to hide my work, I wouldn't be as vulnerable. In my experience, it is always on the streets where sex work becomes more dangerous. But sex work isn't what kills us. It's the way that we are forced to engage in sex work because of the law. And the

criminalization of my work, pushing me into secluded parts of the city. All of this contributes to the stigma that we face as sex workers.

### **Criminalization Facilitates Stigmatization, Which Hurts Sex Workers**

12. While I was always proud of my work, because it allowed me to provide for myself and my children, I often had to hide it from others. Not from my children, though. I have always told my children that I am a sex worker. I never wanted them to be ashamed of what I did. I helped them to understand that I was a service provider who takes care of people in a very special way that only certain people can do.

13. I know how many people see sex workers. I feel that stigma. But I dignified my employment to my children. My children never judged me for engaging in sex work. I wanted them to be happy and I provided a good life for them – I bought them nice things and was able to spend a lot of time at home because I didn't have a traditional full-time job. When I did leave for work, I looked good. And when I came home from work, I looked good. It was a good job like many other professions.

14. My children also understood the importance of the community advocacy work that I did as an Indigenous woman and sex worker. They often joined me on the front lines of protests, marches, and other events.

15. But when my children went to school, they could never tell anyone that their mom was a sex worker. I could never attend things like career day. As Indigenous children, it would be yet another thing that they would be stigmatized for. While some of my children initially hid what I did for living, they later all became publicly supportive of my work. My son bought me my first red umbrella – a symbol of sex workers' rights. This was a special moment for me. My children were able to understand that sex work is a profession just like any other – and one that it is deserving of dignity.

16. Currently, I engage in a lot of street-level sex work and some escort work. It has become hard to negotiate a rate in street level sex work that I am content with. I find that there is a lot of stigma towards street-level sex workers. It's not uncommon for me to be told by people passing by that I am dirty and that I shouldn't be on the streets. I would like

to have the ability to screen clients, be able to arrange safe spaces to work, and have someone check in on me. But that's not something that I can currently do. As a result, I continue with street-level sex work.

17. I have faced a lot of stigma because of my job, and in particular my street-level work. Some people in my community think I am just an object for sex and that anybody can pay what they want to do whatever they want to me. This stigma and devaluing of sex work, which is affirmed by the law, puts sex workers at risk. For example, if I am working on the street, stopping cars, or working in a public place, and I am sexually assaulted on the job, I would be afraid to tell anyone because no one would believe me. People would just tell me that I am the one that put the target on myself.

18. Engaging in street-level sex work can be tough. The message of the criminal laws on important aspects of street-level sex work is clear: sex workers aren't tolerated because we aren't worthy. Sex work is not something that I want to be ashamed of – I am a service provider and just like other service providers, and I shouldn't be looked down upon. But because of the way that street-level sex work is shunned, people don't see me as Lanna. They don't see me as a mother. They don't see me as a community member. They don't see me as an artist. They don't see me as a land defender. They don't see me as a service provider. They don't see me as equal. They just see me as a whore – and all of the negative things that come along with that word. This puts me in a constant state of self defence.

19. People don't want me on “their” streets. People don't want me in “their” neighbourhoods. They don't want me to be visible in the community. I can't even go to the laundromat without facing stigma – I have been told that I am washing my “whore clothes”. These are the realities that sex workers like me have to deal with every day.

### **Barriers to Advertising Result in Greater Engagement with Street-Level Sex Work**

20. I continue to engage in street-level sex work. One of the reasons for this is because it's so challenging to try to advertise my services on the internet or in other ways. I find it difficult to advertise online since the new criminal laws came in place. Advertisers now need to know all about you, requiring photo identification and a credit card, or they require

you to pay by Bitcoin. These requirements make advertising online virtually inaccessible to me. I don't have photo identification or a credit card, and I certainly don't have Bitcoin.

21. If I was able to advertise and market myself properly – and if it wasn't illegal for advertisers to promote my services, I would make more money and the work would be a lot safer. But my options, and the options of many street-level sex workers, are very limited. We are left to the streets and the dangers that I have described above.

22. When I work on the streets – I am outside – on my own. A car will slow down, and I have to make a decision. When I jump into the car, I am with a stranger, who immediately drives off. This is a real contrast to what my working conditions would be like if I were able to properly advertise online – where I could screen potential clients, let a friend know where I was going, give them the address, and negotiate with the client in advance. Maybe I would have someone who knows who I am seeing, finds a room, takes me there, and tells clients that they will be checking up on me. All of this would make me feel a lot safer. But none of these safety measures are available to me when working on the streets.

### **The *PCEPA* Creates Conditions That Put Sex Workers at Risk**

23. In the places that I can currently work on the streets, there are not usually a lot of people around. It's a trade-off – if I am close enough that someone could help me if I were in trouble, then I am often in a public place and may be surveilled by police. The police don't protect street-level sex workers because they don't care about our well-being – even though it is us girls who are working outside that face more risks to our safety. The police have even harassed me when I'm working on the streets.

24. Sex workers like me are the ones who are at risk of being victimized – because we are the ones who are getting into strange cars. When we get out – we have cash on us – and people are watching us and may try to take our money. We become targets on both ends – getting into cars with strange people – and getting out of cars with money. It would be good to work together with other street-level sex workers, and for people to know we were working together. Instead, the law leaves us on our own.

25. It is illegal for me to work in the most basic ways. In some places, we can quickly screen cars, but in others, we cannot. When a car pulls up, there is not a lot of time – as the clients are nervous. The criminalization of clients in recent years makes them paranoid during our engagements. Clients are very scared of being caught and charged by the cops. So the quicker, the better. Oftentimes, clients will even ask if I am a cop before I get in. I have to quickly show them that I am not wearing a wire, and reassure them that I am not a cop. I have little time to decide whether to get into that car and I often spend it proving that I am not a cop, rather than trying to do an initial screen of the client.

26. This situation is made more dangerous because the law stops me from working near many public places – like school yards or parks – even at night – so I get pushed into more isolated places. I end up in more secluded spaces, like commercial or industrial areas.

27. I would prefer to work somewhere that is well-lit and visible. But the law pushes sex workers into places where I am alone and the lighting is minimal. These areas do not have many shops around – maybe a single 24-hour convenience store if I'm lucky. But that's it. This means that there are very few people around when I am working. It means that I am pushed into places where few others go.

### **The *PCEPA* Enables Violence Against Sex Workers**

28. Like any other job, there are opportunities for violence and exploitation in sex work. The legal restrictions on sex work puts sex workers, clients, and many third party supports at risk of being criminalized. If sex work was just another job, it wouldn't be set up this way. I find that the law gives clients a lot of control and power over sex workers, because they know that no one is around to help protect us and keep us safe. This is particularly true for Indigenous sex workers like me.

29. For example, if I go on a date and don't get paid, I cannot go to police. This is how I feel based on all my other negative encounters with police as an Indigenous women – the police have never believed me. Anybody who thinks otherwise hasn't walked a mile in my shoes.

30. In one instance, I called the cops because my boyfriend punched me in the face. But instead of believing me, the cops believed my boyfriend, who claimed I punched myself in the face. Why would I ever do that? I just don't get protection from police if something happens to me. Other Indigenous sex workers share the same stories, and that is why we feel like we cannot go to the cops if we are in need of protection. I fear that the police would just dismiss my experiences like they have in the past. As an Indigenous sex worker, I do not believe they would offer me any support if I said I was violated or mistreated. I think they would instead tell me to suck it up and that it was part of my job as a sex worker. They wouldn't see it for the crime that it is. Indigenous sex workers like me do not feel comfortable going to the police about anything – especially not a sexual assault on the job. They would laugh at us.

31. In my thirty years as a sex worker, most of my clients have been very good to me. There are some bad clients out there. Of course, there are bad clients at any service job. I have had some violent experiences with clients. And I have been hurt by clients. But rather than tell police, I tell other sex workers on the street so that they are aware of the people who are out there that might be violent. We do this as a community to help protect each other and keep one another safe. By contrast, my interactions with police are limited to them harassing me and them disbelieving me when I've been hurt.

32. Not long ago, I had a client who I would regularly see. Over a few months, he spent lots of money on me. But the last time I saw him, he was drunk. While I was naked, he pulled out his bank statement and showed me how much he had spent on me. He claimed that I owed him and said he was not going to pay me for my services. He demanded that he get any service that he wanted and refused to allow me to negotiate. Instances like these happen to sex workers, though in my experience they are rare.

33. I did not have any confidence that the police would take my side in this situation. The client was a white man who was clean cut, employed, and had money. I have enough life experience to know that he would be believed over me. Since I was naked when he was aggressive, I had to wait until he was done sexually assaulting me. I was so scared. When it was over, I ran out as quickly as I could. I was shocked at what had happened.

34. Other people have physically hurt me while I was working. I have been punched in the face and beat up by clients. These acts of violence are the exception, rather than the rule, even in street-level sex work. But they are made easier when I am working alone, isolated, and in darkness. They happen because it is obvious that I am unprotected and that the police will not help an Indigenous sex worker.

35. In fall of 2019, I was approached by a man on a bicycle while I was working outside. He asked me to meet him around the corner and named the building. He brought me to a laundry room on the 16<sup>th</sup> floor. It was 4:00 am. The man then pinned me down and did what he wanted to me. When I tried to resist, he punched me in the face. I started to bleed. When he was done with me, he did not pay me. I had to wipe the blood off of my face, leave the building, and try to find another client.

36. I felt as though I couldn't go to the police. But these are the instances that really show how important it is for sex workers to be able to take steps to work on the streets safely, visibly, and with others, and to do whatever we can to protect ourselves.

### **Sex Work is a Service**

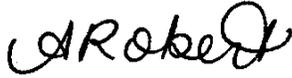
37. When I tell other people about sex work, I always explain that humans are physical and emotional beings who need ways to express themselves. It's part of being human. As a service provider, I feel happy when my clients are happy. The most important part of this whole thing is that sex work needs to be seen as job. If it can be seen that way, then everything else will fall into place.

38. My hope is that this case will help decriminalize sex work – so that if others choose to do sex work, they will have worker's rights, not face stigma, and have much more support than I ever had.

39. Even though I have had some difficult experiences as a sex worker, I am not a victim or someone controlled by others. I freely choose to do sex work because it is the best way for me to earn the money that makes the rest of my life possible. I am a proud mother, human rights advocate, and land defender who has chosen to engage in sex work.

40. I affirm this Affidavit support of this Application.

**AFFIRMED on April 25, 2022.**



**Alana Robert, Commissioner for taking Affidavits**

LS# 79761P

  
**LANNA MOON PERRIN**

CANADIAN ALLIANCE FOR SEX  
WORK LAW REFORM et al.  
Applicants

and

ATTORNEY GENERAL OF  
CANADA  
Respondent

Court File No.: CV-21-00659594-0000

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**  
Proceeding commenced at Toronto

**AFFIDAVIT OF LANNA MOON PERRIN**  
**(Affirmed April 25, 2022)**

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