

Statement of Claim

Court File No. _____

IN THE SUPERIOR COURT OF JUSTICE

BETWEEN:

****Marie Seshat Landry****

****Plaintiff****

-and-

****Royal Canadian Mounted Police (RCMP)****

****Defendant****

NOTICE OF ACTION

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff.
The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or a lawyer acting for you must prepare a Statement of Defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiff's lawyer or where the Plaintiff does not have a lawyer, serve it on the Plaintiff, and file it, with proof of service, in this court office, WITHIN TWENTY DAYS after this Statement of Claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your Statement of Defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. If you wish to defend this proceeding but are unable to pay legal fees, legal aid may be available to you by contacting a local Legal Aid office.

Date: _____

Issued by: _____

Local Registrar

Address of court office:

TO: The Royal Canadian Mounted Police (RCMP)

STATEMENT OF CLAIM

1. **Parties**

1.1 **Plaintiff:** Marie Seshat Landry, an individual residing in [Plaintiff's Address], [City], [Province], [Postal Code].

1.2 **Defendant:** The Royal Canadian Mounted Police (RCMP), a federal agency responsible for law enforcement in Canada.

2. **Jurisdiction**

2.1 This court has jurisdiction over this matter pursuant to the laws of Canada and the province of [Province].

3. **Facts**

3.1 The Plaintiff is a transgender woman who has been subjected to systemic discrimination, harassment, and wrongful legal actions by the Defendant from 2016 to 2023.

3.2 The Defendant, through its officers, engaged in persistent misgendering, wrongful detentions, false charges, and refusal to accept the Plaintiff's depositions, which were all acts of discrimination based on gender identity.

3.3 The Plaintiff was falsely accused of an "Indecent Act" in 2016, which was withdrawn, but the Defendant continued to maintain incorrect records, impacting the Plaintiff's reputation and legal standing.

3.4 The Defendant's actions included the following:

3.4.1 Misgendering and refusal to acknowledge the Plaintiff's transgender identity.

3.4.2 Failure to protect the Plaintiff's rights under Canadian law, including Bill C-16 (2017) and the Conversion Therapy Bill (2022).

3.4.3 Incorrect documentation of charges, affecting the Plaintiff's reputation and causing significant mental health issues, including PTSD, depression, and anxiety.

3.4.4 Numerous false charges, wrongful detentions, and harassment incidents, resulting in severe emotional and psychological distress.

3.4.5 Refusal to investigate the Plaintiff's depositions and reports of threats from a far-right neo-Nazi group, endangering the Plaintiff's safety.

4. ****Causes of Action****

4.1 ****Discrimination and Violation of Rights:**** The Defendant's actions constitute discrimination and violation of the Plaintiff's rights under the Canadian Charter of Rights and Freedoms, the Universal Declaration of Human Rights, and other relevant Canadian laws.

4.2 ****False Arrest and Wrongful Detention:**** The Defendant wrongfully detained the Plaintiff multiple times without proper cause, violating her rights to liberty and security.

4.3 ****Defamation:**** The Defendant's actions led to the defamation of the Plaintiff's character, causing irreparable damage to her reputation.

4.4 ****Negligence:**** The Defendant was negligent in failing to protect the Plaintiff's rights, properly document her legal status, and investigate her claims.

4.5 ****Intentional Infliction of Emotional Distress:**** The Defendant's actions were intentional and caused severe emotional and psychological harm to the Plaintiff.

5. ****Damages****

5.1 The Plaintiff claims general damages for pain and suffering, emotional distress, and loss of reputation in the amount of \$25,000,000 CAD.

5.2 The Plaintiff claims special damages for past and future medical expenses, loss of income, and other pecuniary losses in the amount of \$10,000,000 CAD.

5.3 The Plaintiff claims punitive damages to punish the Defendant for its egregious conduct and to deter similar actions in the amount of \$15,000,000 CAD.

6. ****Relief Sought****

6.1 The Plaintiff seeks:

6.1.1 General damages in the amount of \$25,000,000 CAD.

6.1.2 Special damages in the amount of \$10,000,000 CAD.

6.1.3 Punitive damages in the amount of \$15,000,000 CAD.

6.1.4 A declaration that the Defendant violated the Plaintiff's rights under the Canadian Charter of Rights and Freedoms.

6.1.5 A public apology from the Defendant.

6.1.6 An order requiring the Defendant to correct all records related to the Plaintiff.

6.1.7 Costs of this action.

6.1.8 Any other relief that this Honourable Court deems just.

Date: _____

Marie Seshat Landry
[Address]
[City, Province, Postal Code]
[Phone Number]
[Email Address]

VERIFICATION

I, Marie Seshat Landry, the Plaintiff in this matter, verify that the facts stated in this Statement of Claim are true to the best of my knowledge and belief.

Marie Seshat Landry

[Date]

END OF DOCUMENT