

AI Assistance Disclosure

AI assistance helped in organizing thoughts, formatting, and drafting portions of this document.

All factual assertions, conclusions, and legal positions remain the responsibility of the author.

IN THE FEDERAL COURT

BETWEEN:

MARIE-SOLEIL SESHAT LANDRY

(Plaintiff)

- and -

HIS MAJESTY THE KING

(Defendant)

STATEMENT OF CLAIM

I. THE PARTIES

1. The Plaintiff, Marie-Soleil Seshat Landry, is a resident of Moncton, New Brunswick, and the CEO of Landry Industries.
2. The Defendant is His Majesty the King, represented by the Attorney General of Canada, responsible for the actions of the Royal Canadian Mounted Police (RCMP).

II. STATEMENT OF FACTS

3. In October 2016, criminal charges against the Plaintiff (Indecent Act and Assault) were formally withdrawn in the Provincial Court of New Brunswick.
4. Despite this judicial withdrawal, the Defendant's agents erroneously recorded and maintained these charges as active "Guilty" convictions within the CPIC and PROS databases for approximately 2,555 days.
5. This falsified record was used by the RCMP and Crown to oppose bail, resulting in approximately 1,000 days of false imprisonment (unlawful remand).
6. While under the duress of this false record and unlawful detention, the Plaintiff was coerced into entering guilty pleas for secondary offenses to secure her liberty.
7. The administrative error was not corrected until May 2023 (Indecent Act) and July 2025 (Assault).

III. CAUSES OF ACTION

8. **Negligence:** The Defendant breached its duty of care to maintain accurate criminal records.

9. **Misfeasance in Public Office:** Agents of the Defendant acted with reckless indifference to the truth of the record to facilitate the Plaintiff's detention.

10. **Charter Violations:** The Plaintiff's rights under Sections 7 (Liberty), 11(d) (Presumption of Innocence), and 15 (Equality) were violated by the state's use of fabricated records.

IV. RELIEF SOUGHT

11. The Plaintiff claims:

- a) General Damages of \$10,000,000.00 for loss of liberty and psychological trauma;
- b) Aggravated Damages of \$2,000,000.00 for high-handed and malicious conduct;
- c) Punitive Damages of \$1,000,000.00 to denounce the systemic failure of CPIC data integrity.

DATED at Moncton, New Brunswick, this ____ day of _____, 2026.

Marie-Soleil Seshat Landry (Plaintiff)

Judge Jolène M. Richard
Stenographer: Nicole P. Murray
Courtroom: 6
Date: October 31, 2016

RETURN FILE TO STENO ☐

CASE # 33044001

TIME/TYPE 9:30 IR

ACCUSED:

Jean Yves Larouche
Present ☒ in custody ☐ absent ☐

Crown Prosecutor:

Defence Counsel:

Eric Calonde
Duty Counsel ☐ Retained ☐

ELECTION: P.C. _____
J.J. _____
J.A. _____

PLEA: GT _____ NG _____ Admit _____
GT to lesser offence _____ Deny _____

Français ☒ English ☐ Domestic violence ☐ BAN OF PUBLICATION ☐

CHARGES:

- 1) CC 173(1)(b) 22 Jan '16 70 MacKenzie 11) _____
2) _____ 12) _____
3) _____ 13) _____
4) _____ 14) _____
5) _____ 15) _____
6) _____ 16) _____
7) _____ 17) _____
8) _____ 18) _____
9) _____ 19) _____
10) _____ 20) _____

POSTPONED FOR _____ ON _____ at _____ before Judge _____
1/2 day ☐ Full day ☐ multi-day ☐ Come Out Order ☐
REASON for adjournment: PB ☐ PD ☐ PL ☐ Letter for Cross Exam ☐

MANAGEMENT APPEARANCE:

- | | |
|--|---|
| ☐ UNDERTAKING
☐ Pre-Sentence Report
☐ Victim Impact Statement

☐ Bail Hearing Held
☐ Remanded
☐ Released

☐ Trial Held
☐ Found Guilty
☐ Found Not Guilty
☐ Stay of Proceedings

☐ Preliminary Inquiry
☐ Committed to Trial
☐ Waived Preliminary

☐ Not Criminally Responsible
☐ Unfit to Stand Trial
☒ Withdrawn
☐ Dismissed
☐ Deemed Guilty | ☐ Warrant of Arrest issued
☐ for jurisdiction
☐ endorsed
☐ for review of sentence

☐ Warrant of Committal Issued

☐ WITNESS Warrant of Arrest
Issued : _____

☐ Warrant of Arrest Vacated
☐ Warrant of Committal Vacated

☐ Warrant of Remand (jail)
☐ S.515 (no contact)

☐ Warrant of Remand Assessment
☐ Criminal Responsibility
☐ Fitness to Stand Trial
☐ Detention Centre
☐ Restigouche
☐ Out of Custody |
|--|---|

- 3- Comportement hors service ou le membre se présente comme un policier et agit avec autorité (ex. : montre son insigne, indique qu'il est policier, etc.)

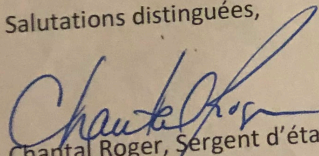
Concernant cette plainte, un examen des informations a permis de déterminer que vous déposiez une plainte concernant le comportement d'un des employés municipaux de la GRC de Codiak qui travaille avec la cour et a inscrit l'information dans les dossiers de police.

Cet employé n'est pas « un membre ou une personne nommée ou employée en vertu de la partie I de la *Loi sur la GRC* ; » puisqu'il est un employé municipal de la Ville de Moncton. Le processus de plainte du public ne peut pas être appliqué aux plaintes concernant une personne qui n'est pas employée sous l'autorité de la *Loi sur la GRC*. Par conséquent, vos préoccupations ne feront pas l'objet d'une enquête en vertu de la partie VII de la *Loi sur la GRC*.

Néanmoins, votre plainte a été portée à l'attention de l'officier responsable du Détachement régional de Codiak de la GRC, le surintendant Benoit Jolette et du gestionnaire responsable des employés municipaux de la GRC de Codiak, Charles Savoie, pour toute mesure qu'ils jugeraient nécessaire. J'apprécie le temps que vous avez pris pour soulever les préoccupations décrites dans votre correspondance au CCETP.

Quant à votre plainte pour harcèlement de la part des policiers de Codiak, elle sera traitée selon la partie VII de la *Loi sur la GRC*. Un enquêteur vous contactera prochainement pour en discuter davantage.

Salutations distinguées,



Chantal Roger, Sergent d'état-major
Sous-Officier responsable
Groupe de la responsabilité professionnelle de la Division J

CC: Direction nationale des plaintes du public
Commission civile d'examen et de traitement des plaintes



Royal Canadian
Mounted Police
Commanding Officer
2023-12-01

Gendarmerie royale
du Canada
Commandant divisionnaire

Ms. Marie Landry
[Redacted]
[Redacted]

RE: Letter of complaint sent to the RCMP J Division Commanding Officer

Dear Ms. Landry,

Thank you for your further correspondence, which our office received on September 26th, 2023.

We understand from the written correspondence sent to Mr. Robert McKee, Member of Legislative Assembly and acknowledge the information you provided in this letter. You provided further evidence to support the potential for an administrative error in the documentation and findings of the court proceedings that you participated in, and in reference to RCMP investigative file: 2016-84414.

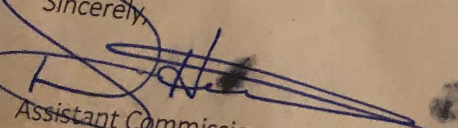
As a result, we re-tasked the "J" Division's Criminal Operations Office to review police investigative file: 2016-84414 and compare with the new evidence submitted. We acquired further documentation from Moncton Provincial Court, including recordings and documentation and we also engaged our Professional Responsibilities unit, to review all actions that transpired that led to the administrative error.

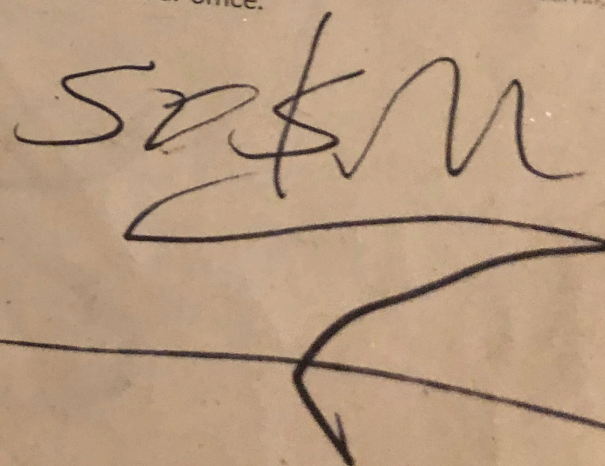
Based on the public complaint investigation led by our Professional Responsibilities Unit, you met with the lead investigator Cpl. Soucy and withdrew your complaint against the Regular Member on September 21st, 2023. You were also issued a letter, dated September 19th, 2023, from S/Sgt. Chantal Roger, officer in charge of J Division's Professional Responsibilities unit, explaining the administrative error conducted by a municipal employee of the Codiak RCMP detachment.

The findings, was shared with Supt. Benoit Jolette, Officer in Charge of the Codiak detachment and City Manager for municipal employees with the Codiak RCMP. Charles Savoie. Both Supt. Jolette and Mr. Savoie were directed to take necessary measures and ensure corrective actions be taken to ensure this occurrence does not re-occur.

We trust that you found the actions taken satisfactory. If you have any further questions or concerns, please do not hesitate to contact your local RCMP Detachment or our office.

Sincerely,


Assistant Commissioner, DeAnna L. Hill, O.O.M.
Commanding Officer, New Brunswick RCMP



Canada



Royal Canadian Mounted Police Gendarmerie royale du Canada

Declaration of Criminal Record

This form must be completed and submitted with RCMP form 6388 - Consent

Applicant

Last Name

LANDRY

Given Name 1

JEAN-YVES

Maiden Name or Other Last Name

Gender

☒ Male ☐ Female

Current Address

29 CONNAUGHT

Certified Criminal Record

Note: A Certified Criminal Record can only be issued based on the submission of

Declaration of Criminal Record

- Does not constitute a Certified Criminal Record by the RCMP.
- May not contain all criminal record convictions.

Declare the following information:

- All convictions for offences under federal law.

Do not declare the following information:

- Absolute Discharges (disclosed for a period of 1 year).
- Conditional Discharges (disclosed for a period of 3 years).
- Any offences while you were a "young person" (12 years old but less than 18 years old).
- Any charges for which you were not convicted, for example, charges that were dropped.
- Any provincial or municipal offences.
- Any charges dealt with outside of Canada.
- Any charge for which you received a stay of proceedings (disclosed until released).

Offence

Date of Sentence
(yyyy-mm)

~~ASSAULT SEC 266 CC~~

~~2017-0~~

~~MISCHIEF UNDER \$5000 SEC 430(4) CC~~

~~2017-0~~

(1) FAIL TO COMPLY WITH UNDERTAKING
SEC 145(3) CC

2017-0

(2) MISCHIEF UNDER \$5000. SEC 430(4) CC

2017-0

(3) TAKE MOTOR VEHICLE WOC SEC 335(1)
CC

2017-0

Signature

I certify that the information provided is correct to the best of my knowledge

Signature of Applicant



Royal Canadian Gendarmerie Royale
Mounted Police du Canada

Sergent d'état-major Chantal Roger
Groupe de la responsabilité professionnelle de la Division J
GRC – Division J
1445 Rue Regent
Frédéricton N.B
E3B 4Z8

Marie Landry

CRCC File # - CCETP no de
référence

2023-2623

Our File - Notre référence

2023-1281916

Date:

Le 19 September, 2023

Objet : Plainte contre un employé municipal

Bonjour,

La présente lettre fait suite aux préoccupations que vous avez exprimées auprès de la Commission civile d'examen et de traitement des plaintes relatives à la Gendarmerie royale du Canada (CCETP) le 19 juillet 2023. Elle traite d'une allégation contre un employé municipal travaillant au bureau de la section de la cour du Détachement régional de Codiac de la Gendarmerie royale du Canada (GRC). L'employé n'a pas correctement documenté les résultats de la procédure judiciaire dans un dossier dans lequel les accusations portées contre vous ont été retirées devant le tribunal en 2016.

J'aimerais vous informer que la GRC et la Commission civile d'examen et de traitement des plaintes relatives à la GRC ont pour mandat, en vertu de la partie VII de la *Loi sur le GRC*, de traiter les plaintes concernant la conduite dans l'exercice de tout devoir ou fonction de tout membre ou autre personne qui, au moment où la conduite aurait eu lieu, était membre ou employé sous le régime de la *Loi sur le GRC*.

Les critères suivants sont requis lorsqu'il s'agit de la partie VII de la *Loi sur la GRC* :

- 1- S'applique uniquement aux membres et aux personnes nommées ou employés en vertu de la partie I de la *Loi sur la GRC*
- 2- Doit concerner la conduite, en service, pendant l'exercice de ces fonctions ; ou



Royal Canadian Gendarmerie Royale
Mounted Police du Canada

Sergent d'état-major Chantal Roger
Groupe de la responsabilité professionnelle de la Division J
GRC – Division J
1445 Rue Regent
Frédéricton N.B.
E3B 4Z8

CRCC File # - CCETP no de
référence

2023-2623

Marie Landry

Our File - Notre référence

2023-1281916

D

Le 1^{er} septembre, 2023

Objet : Plainte contre un employé municipal

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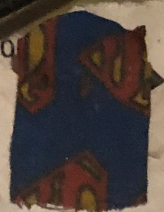
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- 1- S'applique uniquement aux membres et aux personnes nommées ou employés en vertu de la partie I de la Loi sur la GRC
- 2- Doit concerner la conduite, en service, pendant l'exercice de ces fonctions ; ou

Public Mobile

52%

96%



McKee, Robert (LEG) 3:03 PM



to me, Prime, marco.mendicino...

Ms. Landry,

I am glad to hear that the issue with the Codiak RCMP and J Division has finally been resolved and that your police file has been updated to reflect the truth. It must have been an incredibly distressing and frustrating experience to have to deal with this situation for the past seven years.

I appreciate you bringing this discriminatory situation to my attention and I understand the importance of addressing the systemic issues within the RCMP that have allowed such prejudice and injustice to persist. It is vital that everyone is treated fairly and justly under the law, and I hope that this resolution will provide some closure and peace of mind.

I hope those responsible for the RCMP take



99+



4





Marie-Soleil Seshat Landry (Marie Landry Spy Shop) <marielandryceo@gmail.com>

Subject: Key Points Meeting Summary - CRCC 2023-2623 / CHRC 2023-0331 / RCMP 2023-1281916

Soucy, Yanick (RCMP/GRC) <Yanick.Soucy@rcmp-grc.gc.ca>
To: Marie Landry <marielandryceo@gmail.com>

Tue, Sep 26, 2023 at 10:10

Good morning Marie.

First, It was nice to meet you last week and I appreciated the conversation.

You will be able to obtain a copy of the audio through ATIP. The 2023-1281916 will have to be reviewed by Fredericton Professional Responsibility Unit and will also be reviewed by the CRCC (Ottawa) before conclusion. Once the review are done, ATIP will be able to provide you with a copy.

In reference to the incidents, that you were involved in between 2016-2019, which led you to get a criminal Record, I would encourage you to seek Legal Counsel for that matter (Not sure how that legal aspect works).

As we discussed, with a Complaint to the CHRA, they oversees the RCMP's actions. They will render a decision in your case with supporting or not supporting your allegations.

If you have any issues with threats (hate mail etc), I would encourage you to make a complaint to one of our local Officers so the matter can be investigated. The RCMP Codiak's phone number is 857-2400.

I don't know if you've received the letter from S.Sgt.Roger yet, but this should be the last letter you get from the RCMP (in reference to Codiak, I don't know about the RCMP in Fredericton ??). You might get something from the CRCC as well, I'm not sure 100%.

I feel bad that there was a mistake made by one of our PSE back in 2016 in your case, in reference to the disposition, but be reassured that the charge under Section 173 was withdrawn accordingly in October 2016 before the Court.

I hope you find justice in whatever you are pursuing and wish you the best. Take care !

Cpl.Yanick SOUCY

RCMP-GRC Codiak

Public-Complaints

(506) 857-2400

[Quoted text hidden]

Marie Seshat Landry (She/Her)
29 Connaught #1
Moncton, NB, E1C 3N7

Dear Ms. Seshat Landry:

Re: Response to October 30, 2024 Correspondence

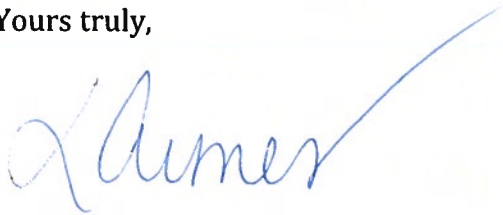
I am writing to you on behalf of the Administration of the City of Moncton (the "City").

The City is in receipt of your letter dated October 30, 2024 addressed to the Mayor's Office. The subject of your letter was: "Formal Public Complaint and Demand for Restitution of \$50 Million Due to City of Moncton Employee Misconduct".

The concerns you brought forward in your letter have been taken seriously by the City. Following receipt your letter, the City promptly conducted an internal review of the matter. It has been determined that the person who made the alleged mistake in 2016 was not an employee of the City and was a Public Service Employee of the Federal Government.

Accordingly, the City has no involvement with your claim and the matter is now considered to be closed.

Yours truly,



Laura Armes (she/her/elle)
Director/ Directrice
Human Resources/ Ressources humaines
Direct | 506-853-3505
laura.armes@moncton.ca