

INTERNAL INTELLIGENCE & SYSTEM METADATA

AI Disclosure: Model: Gemini 2.5 Flash / Verification State: Corrected based on the original May 20, 2026 draft. Cumulative relief sought across general, aggravated, and punitive damages totals exactly \$13,000,000.00.

Keywords: Federal Court of Canada, Statement of Claim, \$13 Million Damages, False Imprisonment, Charter Violations, Misfeasance in Public Office, CPIC Data Integrity, Marie-Soleil Seshat Landry.

Court File No.: _____

IN THE FEDERAL COURT

BETWEEN: JEAN-YVES LANDRY

(ALSO KNOWN AS MARIE-SOLEIL SESHAT LANDRY)

Plaintiff

- and -

DEFENDANT: HIS MAJESTY THE KING

Defendant

STATEMENT OF CLAIM

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 solicitor acting for you must prepare a Statement of Defence in Form 171B prescribed by the Federal Courts Rules, serve it on the Plaintiff's solicitor or, where the Plaintiff is self-represented, on the Plaintiff, and file it, with proof of service, at a registry of this Court.

WITHIN 30 DAYS after this Statement of Claim is served on you, if you are served in Canada or the United States, or within 60 days if you are served outside Canada or the United States.

IF YOU FAIL TO DEFEND THIS PROCEEDING, judgment may be given against you in your absence and without further notice to you.

I. JURISDICTION AND PARTIES

1. The Plaintiff, Jean-Yves Landry (also known as Marie-Soleil Seshat Landry), is a resident of Moncton, New Brunswick, and the Chief Executive Officer of Landry Industries. The Plaintiff is self-represented in this action.
2. The Defendant is His Majesty the King, represented by the Attorney General of Canada. The Defendant is the legal entity responsible for the actions, operations, policies, and systemic administrative errors of the Royal Canadian Mounted Police (RCMP).

II. STATEMENT OF FACTS

3. In October 2016, formal criminal charges against the Plaintiff, specifically consisting of Indecent Act and Assault, were completely and formally withdrawn within the Provincial Court of New Brunswick.
4. Despite this clear judicial termination and withdrawal, the Defendant's agents erroneously, inaccurately, and falsely recorded and maintained these charges as active, operational "Guilty" convictions within the Canadian Police Information Centre (CPIC) and the Police Reporting and Organization System (PROS) databases.
5. The Defendant's agents maintained this falsified, erroneous record actively within the aforementioned national law enforcement databases for a duration of approximately 2,555 days.
6. This fabricated criminal history record was subsequently relied upon and weaponized by the RCMP and the Crown prosecution to aggressively oppose judicial interim release (bail). This direct reliance on an uncorrected administrative falsehood resulted in approximately 1,000 days of false imprisonment and unlawful remand for the Plaintiff.
7. While subjected to the intense duress, psychological strain, and physical confinement of this unlawful detention and false record, the Plaintiff was unlawfully coerced into entering guilty pleas for secondary offenses solely to secure her physical liberty from indefinite remand.
8. The egregious administrative records errors were not corrected by the Defendant's agents until May 2023 (in relation to the Indecent Act charge) and July 2025 (in relation to the Assault charge).

III. CAUSES OF ACTION

A. Breach of the Canadian Charter of Rights and Freedoms

9. The Defendant, through the operational actions and systemic failures of the RCMP, directly breached the rights of the Plaintiff guaranteed under the *Canadian Charter of Rights and Freedoms*:
- **Section 7 (Right to Liberty and Security of the Person):** The falsified record was utilized to unjustly oppose bail and secure the Plaintiff's protracted remand (false imprisonment). This total deprivation of liberty was a stark departure from the principles of fundamental justice, given that it was directly predicated on an invented, unverified fact maintained by the State.
 - **Section 11(d) (Right to be Presumed Innocent):** The sustained dissemination and use of a record falsely indicating prior guilty pleas or convictions for long-withdrawn charges irreparably prejudiced the Plaintiff's right to a fair hearing and the presumption of innocence in subsequent proceedings, directly resulting in coerced guilty pleas.
10. The Defendant is directly and vicariously liable for these severe, unconstitutional Charter breaches.

B. Misfeasance in Public Office

11. The RCMP officials, acting at all material times as agents of the Defendant, engaged in deliberate, bad-faith, and unlawful conduct directly concerning their public duties of data integrity and judicial reporting.
12. The officials either:
- **a)** Possessed actual knowledge that the criminal history record was false yet intentionally or with reckless indifference permitted its introduction and use in open court; or
 - **b)** Maintained an egregious, bad-faith level of reckless indifference to the truth of the record, knowing full well that such a record was actively being deployed to facilitate the Plaintiff's pre-trial detention and extract subsequent convictions.
13. The unilateral closure of internal investigations into this matter, combined with the administrative assertion that the admitted error resulted in "no repercussions," demonstrates a calculated, high-handed disregard for the truth and a deliberate attempt to shield the Defendant from institutional liability, fulfilling every prerequisite for the tort of Misfeasance in Public Office.

C. Negligence

14. The RCMP and the Defendant owed a strict operational duty of care to the Plaintiff, and to the Canadian public at large, to maintain accurate, verified, and timely criminal records, particularly when those records are explicitly intended for use in judicial proceedings that directly govern individual liberty.
15. The Defendant breached this operational duty of care by:
 - **a)** Grossly recording a clean record/withdrawn verdict as a "Guilty Plea";
 - **b)** Failing to execute basic data integrity protocols, leaving the error uncorrected for nearly a decade (until 2023 and 2025); and
 - **c)** Repeatedly furnishing and validating this false record for transmission to the Crown and the Courts.
16. This systemic negligence was the direct, proximate, and foreseeable cause of the Plaintiff's severe injuries and losses, including an extensive loss of personal liberty, escalating legal costs, total reputational destruction, and severe mental anguish stemming from fighting an entrenched systemic injustice.

IV. JUDICIAL REVIEW

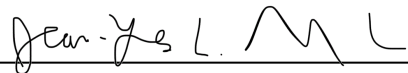
17. To the extent necessary, the Plaintiff seeks a concurrent Judicial Review of the final administrative determinations made by the Civilian Review and Complaints Commission (CRCC) and the Canadian Human Rights Commission (CHRC) which unreasonably concluded that the RCMP's admitted database error resulted in "no repercussions."
18. The Plaintiff submits that these administrative decisions were fundamentally unreasonable, lacked intelligible justification, and were based on a complete misapprehension of the evidentiary record, thereby failing to satisfy the standards of review required by Canadian administrative law.

V. RELIEF SOUGHT

19. The Plaintiff claims the following relief from the Defendant:
 - **a) A Declaration** that the Defendant, through the operational failures of the RCMP, breached the Plaintiff's constitutional rights under Sections 7 and 11(d) of the *Canadian Charter of Rights and Freedoms*;
 - **b) General Damages** in the amount of **\$10,000,000.00** for the profound pain, suffering, extensive loss of liberty, and long-term psychological distress caused by the false record and subsequent unlawful remand;

- **c) Aggravated Damages** in the amount of **\$2,000,000.00** due to the high-handed, malicious, and flagrantly unconstitutional nature of the Defendant's conduct, highlighted by an admitted error followed by institutional minimization and assertions of "no repercussions";
- **d) Punitive Damages** in the amount of **\$1,000,000.00** to vindicate the court, deter future state misconduct, and soundly denounce the Defendant's systemic failure to maintain data integrity, their use of false records to subvert judicial fairness, and the subsequent administrative cover-up;
- **e) Special Damages** for all quantifiable out-of-pocket expenses, including all past legal fees directly associated with mitigating the coerced guilty pleas and executing the current civil litigation;
- **f)** Pre-judgment and Post-judgment interest pursuant to the *Federal Courts Act*; and
- **g)** The full costs of this Action.

DATED at Moncton, New Brunswick, this 22nd day of May, 2026.



Marie-Soleil Seshat Landry
Plaintiff (Self-Represented)

Address for Service:

1-29 Connaught Avenue,
 Moncton, New Brunswick, E1C 3N7

Phone Number: +1 506 588 2787

Email Address: marielandryceo@gmail.com

STATUTORY, CONSTITUTIONAL, AND PRECEDENT FRAMEWORK REFERENCES

1. Canadian Charter of Rights and Freedoms, s 7, Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11.
2. Canadian Charter of Rights and Freedoms, s 11(d), Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11.
3. Canadian Charter of Rights and Freedoms, s 24(1), Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11.
4. Crown Liability and Proceedings Act, RSC 1985, c C-50, s 3 (Vicarious liability of the Crown).
5. Federal Courts Act, RSC 1985, c F-7, s 17 (Jurisdiction in actions against the Crown).
6. Federal Courts Rules, SOR/98-106, Form 171A (Statement of Claim format).
7. *Henry v British Columbia (Attorney General)*, 2015 SCC 24, [2015] 2 SCR 214 (Charter damages for prosecutorial misconduct/wrongful non-disclosure).
8. *Odhavji Estate v Woodhouse*, 2003 SCC 69, [2003] 3 SCR 263 (Elements of the tort of misfeasance in public office).
9. *Hill v Hamilton-Wentworth Regional Police Services Board*, 2007 SCC 41, [2007] 3 SCR 129 (Tort of negligent investigation and police duty of care).
10. *Canada (Minister of Citizenship and Immigration) v Vavilov*, 2019 SCC 65, [2019] 4 SCR 653 (Standard of reasonableness for judicial reviews).
11. Criminal Code, RSC 1985, c C-46, s 515 (Judicial interim release protocols and statutory framework).
12. Royal Canadian Mounted Police Act, RSC 1985, c R-10 (Statutory framework governing RCMP officer conduct and accountability).
13. Civilian Review and Complaints Commission for the RCMP (CRCC) Mandate, RSC 1985, c R-10, Part VI.
14. Canadian Human Rights Act, RSC 1985, c H-6 (Statutory framework regarding systemic administrative treatment and public reporting).
15. Privacy Act, RSC 1985, c P-21 (Statutory protections governing accuracy of personal data held by government institutions).
16. *Vancouver (City) v Ward*, 2010 SCC 27, [2010] 2 SCR 28 (Framework for awarding functional damages under Section 24(1) of the Charter).
17. *Roncarelli v Duplessis*, [1959] SCR 121, 16 DLR (2d) 689 (Foundational principle of rule of law and abuse of public power).
18. *Boucher v The Queen*, [1955] SCR 16, 110 CCC 263 (Duties of State actors regarding absolute clarity and balance in presenting criminal facts).
19. *Nelles v Ontario*, [1989] 2 SCR 170, 60 DLR (4th) 609 (Eradication of absolute state immunity concerning deliberate tortious acts).
20. Criminal Records Act, RSC 1985, c C-47 (Statutory governance on the explicit administration, retention, and vacation of criminal history records).