

CANADA
PROVINCE OF QUEBEC
DISTRICT OF QUEBEC
File no.

SUPERIOR COURT

JACQUELINE SANDERSON, residing at
200 Alexandre de Prouville Street,
Carignan, Province of Quebec, J3L 6X2,

Applicant;

-vs.-

**CONSEIL DE LA MAGISTRATURE DU
QUEBEC**, situated at 300 Jean- _ Lesage
Blvd., Bureau RC-01, Québec Province of
Quebec, G1K 8K6,

Defendant;

**ORIGINATING APPLICATION FOR THE JUDICIAL REVIEW OF A
DECISION OF THE DEFENDANT**

(articles 34, 49, 100, 142, 529, 530 of the *Code of Civil Procedure*)

**TO ONE OF THE HONOURABLE JUSTICE OF THE SUPERIOR COURT OF THE
DISTRICT OF QUEBEC, THE APPLICANT RESPECTFULLY SUBMITS THE
FOLLOWING:**

1. The Applicant is requesting the judicial review of a decision of the Defendant with respect to certain matters in relation to a complaint filed by the Plaintiff against the Honourable Justice Sacha Blais (the "**Decision**"), the Decision is filed herewith as **Exhibit P-1**;
2. Although the Decision is dated April 15, 2025, the Plaintiff did not receive the letter until September 22, 2025, after she was following up on the complaint;
3. The Plaintiff made two (2) complaints against the Honourable Justice Sacha Blais, the letters of the Plaintiff are filed herewith as **Exhibit P-2**;
4. The first complaint involved an episode that arose during the trial of Samuel Roberge at the Longueuil Courthouse. On March 14, 2024, the Plaintiff, at the time when she was a lawyer representing Mr. Roberge, made an objection because the witness was insisting to testify with a mask. Justice Blais immediately became very angry and asked if the Plaintiff had jurisprudence to support her objection. The Plaintiff responded that she did not have the name of the case but that it was well known during COVID;

5. Justice Blais became very angry again and said he was leaving the courtroom until the Plaintiff found the caselaw to back her objection. The Plaintiff was so intimidated that she found the caselaw and sent it to the Judge but then she felt obligated to withdraw her objection even though she was correct;
6. The stenographic notes of March 14, 2024, are filed herewith as **Exhibit P-3** and were provided to the Defendant;
7. The Decision erroneously concluded that the Plaintiff had lost all of the judgments of Justice Blais mentioned in her complaint. The Plaintiff respectfully submits that this conclusion is inaccurate, as the objection concerning the mask represented the most serious instance of judicial misconduct. Furthermore, Justice Blais expressly acknowledged that the legal arguments advanced by the Plaintiff were correct in law;
8. On June 20, 2024, Justice Blais also corrected the Plaintiff's English accent in an angry manner and spoke in a condescending manner to the witness of the Plaintiff who was an ex-police officer from Longueuil who had agreed to testify on behalf of Mr. Roberge;
9. However, the most important complaint was in the second letter of the Plaintiff in which she stipulated that Justice Blais had made false statements to the Plaintiff after an *ex parte* hearing held on June 6, 2024;
10. It appears that the Plaintiff received the recordings of the *ex parte* hearing of June 6, 2024, by accident from a clerk at the Longueuil Courthouse. However, even if they were obtained by mistake, the Defendant had an obligation to listen to the recording and evaluate the conduct and the comments made by Justice Blais on the recording;
11. Furthermore, the Decision does not even deal with the issue of the lack of *distanciation* between Me Eve Malouin and the Honourable Justice Blais. During the *ex parte* hearing, you can hear the two of them laughing together. Moreover, several times during the trial they looked at each other with strange facial expressions as if they were sending signals to each other especially when the Plaintiff announced her last witness, being the ex-police officer from Longueuil;
12. It should be noted that Justice Sacha Blais was previously the immediate superior of Me Eve Malouin for more than 10 years prior to becoming a Judge of the Court of Quebec. Moreover, Me Eve Malouin had assisted in the removal of the said ex-police officer of Longueuil from the drug investigations unit at the Longueuil Police;
13. Furthermore, with respect, the Defendant does not have jurisdiction over the Plaintiff and neither do the Courts with respect to the recording of the *ex parte* recording. The Plaintiff is no longer a lawyer nor an officer of the court and she did not obtain the recording when she was an officer of the court. However, this is not

relevant for the purposes of this motion because the relevant parts of the recording in which Justice Blais made contradictory comments with respect to the breach of the right to an attorney are now public because the Plaintiff read them out in the Superior Court on May 12, 2025 before the Honourable Justice Marc-André Blanchard;

14. On January 15, 2025, Me Eve Malouin became aware that the defendant in the criminal case, Samuel Roberge, had heard the recording of the said *ex parte*. On January 24, 2025, Me Eve Malouin mandated Me Maxime Fournier, also a lawyer for the Director of Criminal and Penal Prosecutions (DPCP), to file a motion in the Superior Court in file number 505-36-002483-248 (the “**SC 248 File**”), a copy of which is filed herewith as **Exhibit P-4**;
15. This SC 248 File had been opened by the defendant, Samuel Roberge, in July 2024, to demand the judicial review of the *ex parte* hearings held by Justice Sacha Blais on June 6, 2024. From the onset, it made no sense that Mr. Roberge was not authorized to be present for a hearing with respect to the conversation that he had with a police officer himself on the way to the police station after he was arrested;
16. Since that date, on May 12, 2025, Justice Marc-André Blanchard confirmed that the alleged privilege which the Crown was seeking protection was the informant privilege as confirmed at page 16 of the stenographic notes of the hearing of May 12, 2025 (the “**May 12 Notes**”), a copy of which is filed herewith as **Exhibit P-5**;
17. During the same hearing, the Plaintiff explained to the Court (Justice Blanchard) that she had no interest in the section of the *ex parte* regarding the testimony of the police officer and Mr. Roberge, her interest was with respect to the conversation between Me Malouin and Justice Blais;
18. The relevant section is from at pages 68 to page 70 of the May 12 Notes and provides as follows:

MS. SANDERSON:

The comments are -- it starts at 15:24, Justice Blais says:

« **Mais vous ne pensez pas qu'en invoquant une violation à son droit à l'avocat et notamment le fait qu'on questionne sur qu'est ce qui a été dit dans le véhicule, si on lui a permis d'appeler un avocat...** »

And Me Malouin responds :

« Je ne vous pas dit... je ne dis pas que c'est simple... », et « ...ha ha ha ha! Mais, en fait, on s'est questionnés très honnêtement, Monsieur le juge... »

And then, I have -- there's stuff that is not really that relevant, and then Justice Blais said:

« Et l'autre élément, c'est que vous ne pensez pas que si je bloque complètement la réponse ou une partie, ça fait pas... »,

and the Judge starts laughing. Maitre Malouin answers again:

Mais y'a pas de bonne... c'est un catch-22 là. Aussitôt qu'on invoque un privilège... »,

and the Judge laughs again,

« ...c'est comme d'annoncer ce qu'il ne faut pas annoncer. »

And then, later on when they're deciding what they're going to tell us about the hearing where at the time I was representing Mr. Roberge, Me Malouin says:

« Il n'y a pas d'éléments de nature disculpatoire. »

And then, later on the judge says:

« On est toujours en huis clos? », to the greffière.

And the greffière says :

« Un instant, Monsieur le juge. »

Okay, and then, this is still in *huis clos* and the Judge -- the part that is important is:

« Que j'ai entendu la réponse et que la question du témoin Saint-Germain qu'il s'agit effectivement, je le confirme, que c'est une discussion à l'intérieur du véhicule, que cette discussion là... n'a pas pris de notes, la policière n'a pas pris de notes, et que dans le contenu de la discussion, je vais dire, comme vous avez proposé, qu'il n'y a rien de disculpatoire (sic), **mais qu'il n'y a pas non plus d'informations avec... en lien avec le droit à l'exercice de l'avocat.** »

19. As noted at the beginning of the conversation between Justice Blais and Me Malouin, Justice Blais specifically addresses the violation of the right to speak to an attorney by the police because they did not allow Mr. Roberge to speak to an attorney. However, at the end of the excerpt above, Justice Blais is planning the manner that he will provide his comments to the Plaintiff and her client when they return to the courtroom and Justice Blais added that there was no information that would have touched on the breach of the right to an attorney;

20. The Plaintiff pleaded to Justice Blanchard that because of these statements by Justice Blais, the Superior Court should intervene. Justice Blanchard stated that Samuel Roberge can plead this in front of Justice Blais or the Court of Appeal at page 73, lines 20 to 24 of the May 12 Notes which provides as follows:

THE COURT:

In as much as Mr. Roberge wants to make that an argument in regards to any claims concerning Justice Blais, he might do so in the future, either before Justice Blais or before the Court of Appeal at a later stage.

21. The problem with this proposal by Justice Blanchard is that Samuel Roberge is yet again left without a lawyer because Me Stéphane Harvey was also coincidentally disbarred on October 3, 2025 and Mr. Roberge does not have a lawyer to represent him anymore;

22. At pages 87 and 88 of the May 12 Notes, the Plaintiff specified to Justice Blanchard that she did not care about the informant privilege becoming public that she only wanted the conversation between Me Malouin and Justice Blais to become public so that she could continue her complaint to the *Conseil de la Magistrature* and the *Barreau du Québec*. Justice Blanchard responded that the Plaintiff could do that:

all the stuff with the police officer and Samuel Roberge is not relevant for our case. What we want public is the fact that Justice Blais specifically told Roberge and myself that the hearing did not touch in any matter whatsoever on the right to an attorney and Me

Malouin laughed and he laughed also, and just before that, he did say -- he directly asked Me Malouin specifically that.

So we agree that all the parts, you can keep the parts redacted about all the parts that have anything to do with identifying an informant or anything else, the only thing we care about is that it remains public and that we can bring to both the Conseil de la magistrature du Québec and ---

THE COURT:

You can ---

MS. SANDERSON:

-- Barreau du Québec ---

THE COURT:

You can obtain that remedy, if that's the case, in due course in an appeal, if the Court of Appeal agrees with your arguments.

23. At the end of the hearing of May 12, 2025, Me Fournier for the DPCP asked that the hearing of May 12, 2025 be kept confidential (*sous scellé*) because the Plaintiff had read out the aforementioned conversation exchange between Justice Blais and Me Malouin. However, Justice Blanchard refused to allow this exchange to be confidential because it was unrelated to the informant privilege which the Crown was seeking protection. The following extract from the May 12 Notes at pages 116 to 117 provide as follows:

Me FOURNIER:

Monsieur le juge, je m'excuse. Je viens d'allumer, pardon. Je sais pas s'il y aurait lieu de mettre l'enregistrement de cette audience sous scellé étant donné qu'il y a eu beaucoup de lectures de ce qui s'est passé en *ex parte* là.

LA COUR:

Oui, mais avec égard, Maître Fournier, je pense que la lecture que madame Sanderson en a faite ne... moi, **ça ne me pose pas de problème à l'égard du privilège de l'informateur de police**.

Me FOURNIER:

Non, non, c'était pas ça. C'était plus par rapport à (inintelligible), mais je sais que vous connaissez très, très bien la publicité des débats, donc...

LA COUR:

Oui, mais je pense que ça ne sera pas nécessaire. On ne va pas en rajouter...

Me FOURNIER:

J'insisterai pas si le Tribunal est satisfait.

LA COUR:

On va pas en rajouter une couche. D'accord?

Me FOURNIER:

Oui. Merci.

24. Therefore, based on the foregoing passage not only did Justice Blanchard authorize that the conversation read out by the Plaintiff remain public but Me Fournier, the lawyer for the DPCP, even agreed to this extract remaining public presumably because it was not related to the informant privilege as suggested by Justice Blanchard;

25. Notwithstanding this agreement by Me Fournier, Me Fournier filed a motion to the Court of Appeal to remove certain paragraphs from the notice of appeal of the Plaintiff. However, the Court of Appeal specifically noted that they do not have jurisdiction over any other files, (*i.e.* the SC 248 File);
26. Furthermore, Me Fournier did not file a notice of appeal within the specified delay to argue that these passages at the hearing of May 12, 2025, before Justice Blanchard, should not be public;
27. Based on the foregoing, the relevant passages above and cited in the letter of the Plaintiff to the Defendant regarding the conduct of Justice Blais are public and should be considered by the *Conseil de la Magistrature* in the evaluation of the conduct of Justice Blais contrary to the conclusion in paragraph 8 of the Decision;
28. It should be noted that on July 17, 2025, Justice Blais would not allow the Plaintiff to testify at a hearing of a motion for unreasonable delay of Samuel Roberge. After the Plaintiff left the courtroom, Justice Blais stated that the pleadings of the Plaintiff would have taken too long and this is the reason that there was a requirement that he order written pleadings on the motion for abuse of process. This is not true because the Plaintiff specifically stated that she only needed 1 hour for her pleadings and there was 1.5 days remaining of the trial. Justice Blais stated that he wanted written pleadings.

FOR THE AFOREMENTIONED REASONS MAY IT PLEASE THIS HONOURABLE SUPERIOR COURT TO:

- GRANT** the present application for judicial review;
- QUASH** the decision of the Defendant, *Conseil de la Magistrature*, dated April 15, 2025 and sent by email to the Plaintiff on September 22, 2025.
- ORDER** the Defendant to consider the relevant portion of the *ex parte* hearing in their evaluation of the conduct of Justice Blais contrary to the conclusion in paragraph 8 of the Decision of April 15, 2025.

CARIGNAN, October 22nd, 2025

Jacqueline Sanderson

Ms. Jacqueline Sanderson

SWORN DECLARATION

I, the undersigned, **JACQUELINE SANDERSON** residing at 200 Alexandre-De Prouville Street, City of Carignan, Province of Québec, J3L 6X2, declare that:

1. I am the Applicant in the present case;
2. I confirm that all the facts mentioned in the present application are true.

AND I HAVE SIGNED AT CARIGNAN

Jacqueline Sanderson

JACQUELINE SANDERSON

Declared solemnly before me by technological means (Facetime) at the City of Montreal on this 22nd day of October, 2025



Amel Nadjjet Sai



NOTICE OF PRESENTATION

APPEL DU RÔLE PROVISOIRE PAR CONFÉRENCE TÉLÉPHONIQUE

Prenez avis qu'un appel du rôle provisoire par conférence téléphonique aura lieu le **17 décembre 2025 à 8 h 45**.

Lors de cet appel, si le dossier est en état, vous pourrez réserver votre date d'audience pour instruction et vous devrez informer le greffier spécial du temps requis pour la présentation des demandes devant être entendues par un juge le jour suivant, et ce, en conformité avec les directives de la juge en chef associée.

Pour toute présentation des demandes devant être entendues par un juge le jour suivant, le rôle annoté indiquant l'heure précise et les modalités (en salle, par visioconférence ou par conférence téléphonique) sera diffusé sur le site de la Cour supérieure dès 16 h 30 le jour de l'appel du rôle provisoire (*coursuperieureduquebec.ca* « Rôles de la cour et audiences virtuelles » « Rôles annotés »).

Pour assister à l'appel du rôle provisoire, vous devez composer le numéro de téléphone suivant : 581-319-2194 ou 1-833-450-1741 et joindre la conférence téléphonique en composant le 800086996#, cinq (5) minutes avant l'heure prévue pour la conférence téléphonique. Elle sera présidée par le greffier spécial les mardis et mercredis et par un juge de la Cour supérieure les jeudis.

PRÉSENTATION DE LA DEMANDE

PRENEZ AVIS qu'à la suite de l'appel du rôle provisoire, la demande sera présentée en division de pratique civile de la Cour supérieure, en salle 3.14 du palais de justice de Québec (300, boulevard Jean-Lesage à Québec), le **18 décembre, 2025, à 9 h**, à moins que d'autres modalités soient applicables à la suite de l'appel du rôle provisoire de la veille (visioconférence ou conférence téléphonique), ou aussitôt que conseil pourra être entendu.

Défaut de se présenter à l'appel du rôle provisoire par conférence téléphonique

PRENEZ AVIS que si vous désirez contester la demande, vous devez participer à l'appel du rôle provisoire par voie de conférence téléphonique. À défaut, un jugement pourra être rendu contre vous lors de la présentation de la demande le lendemain, sans autre avis ni délai.

CONTESTATION DE LA DEMANDE

PRENEZ AVIS que tout dossier dont la durée d'audience excède trente (30) minutes sera fixé uniquement après que le greffier spécial ou le juge ait été informé de la durée de l'audience.

DÉFAUT DE SE PRÉSENTER À LA DATE D'audience POUR INSTRUCTION fixée lors de la conférence téléphonique

PRENEZ AVIS que si vous ne vous présentez pas devant le Tribunal à la date d'audience pour instruction fixée lors de la conférence téléphonique, jugement pourra être rendu contre vous sans autre avis ni délai.

OBLIGATIONS

PRENEZ AVIS que vous avez l'obligation de coopérer avec l'autre partie, notamment en vous informant mutuellement, en tout temps, des faits et des éléments susceptibles de favoriser un débat loyal et en vous assurant de préserver les éléments de preuve pertinents (article 20 C.p.c.).

CARIGNAN, October 22nd, 2025

Jacqueline Sanderson

Ms. Jacqueline Sanderson

LIST OF EXHIBITS

Exhibit P-1

Decision of the *Conseil de la Magistrature* dated April 15, 2025 and received on September 22, 2025

Exhibit P-2

Letters of the Plaintiff sent to the Defendant

Exhibit P-3

Stenographic notes of the hearing of March 14, 2024 before the Honourable Justice Sacha Blais

Exhibit P-4

Motion entitled "*Requête sui generis afin de récupérer des renseignements disséminés en contravention d'une ordonnance de la cour du Québec*", dated January 25, 2025.

Exhibit P-5

Stenographic notes of the hearing of May 12, 2025 before the Honourable Justice Marc-André Blanchard

CARIGNAN, October 22nd, 2025

Jacqueline Sanderson

Ms. Jacqueline Sanderson
200 Alexandre-De Prouville Street
Carignan (Quebec) J3L 6X2
Tel: (514) 473-5725
email: jackieclairesanderson@yahoo.ca

SUMMONS TO THE DEFENDANT AND THE IMPLEADED PARTY
(article 145 of the *Code of Civil Procedure*)

PLEASE TAKE NOTICE THAT the Plaintiff has filed with the Clerk of the Superior Court, in the district of Quebec, the present judicial application.

You must answer this demand in writing, personally or by your attorney, at the *Palais de Justice* of Quebec located at 300 boulevard Jean-Lesage Québec (Québec) G1K 8K6 within 15 days of the notification to you. The answer must be notified by email to the Plaintiff, being Ms. Jacqueline Sanderson. If you do not file this written answer at the Courthouse within the prescribed delay of 15 days, a judgment by default could be rendered against you.

In your answer, you must indicate your intention to do any of the following actions:

- to propose to make an out-of-court settlement with the Plaintiff;
- to propose that the parties attend mediation to settle the matter;
- to contest the demand and to establish, with the Plaintiff, the contents of the case protocol. The case protocol must be filed in the court record within 45 days of the date of service of the present summons;
- to propose that the parties attend a settlement conference by consent of the parties.

The said Answer must mention your coordinates, including email, or the name of your attorney and his or her coordinates.

The Plaintiff shall file the exhibits listed on the List of Exhibits filed herewith and copies of such exhibits are available upon request to the Plaintiff.

CARIGNAN, October 22nd, 2025

Jacqueline Sanderson

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