COMPLAINT TO THE CANADIAN JUDICIAL COUNCIL

Pursuant to the Judges Act, R.S.C., 1985, c. J-1

FILED — JUNE 30, 2026

"It is not our words that define us — it is the words we refuse to honor."

IDENTIFICATION OF PARTIES

Complainant:

Danny William Perez

Capacity:

Designated Plaintiff — Class Action 500-06-001298-245

Counsel:

Self-represented at both Habeas Corpus hearings. Mr. Perez represented himself, from his prison cell, on September 14 and October 27, 2023. No counsel was present or retained for these proceedings.

Counsel (class action):

Dufresne | Wee s.e.n.c.r.l. — Me Justin Wee, Me Audrey Labrecque, Me Jérôme Aucoin

Retained only for class action 500-06-001298-245, subsequent to the Habeas Corpus hearings

Subject Judge:

L'honorable Éliane B. Perreault, j.c.s.

Court:

Superior Court of Quebec — Criminal Jurisdiction

District:

Beauharnois (Valleyfield)

RELATED PROCEEDINGS

Habeas Corpus #1 :

760-36-000897-234 — September 14, 2023 — 284 pages of transcription

Habeas Corpus #2 :

October 27, 2023 — Same court, same issues

Class Action:

500-06-001298-245 — Perez c. Procureur général du Québec

Prosecutors:

Me Juliette Reny (PGQ), Me Patrick Cardinal (DPCP)

23+

DOCUMENTED SYSTEMATIC DEADLOCKS

Presented on the record — Acknowledged by the AG prosecutor — Ignored by the judge

THE MIRROR — THE JUDGE'S OWN WORDS

The complaint that follows does not rest on the complainant's interpretations, opinions, or allegations. It rests on **Justice Perreault's own words**, as recorded in the official 284-page transcription by court reporter Paulette Houde — words that

demonstrate she understood the gravity of the problem, acknowledged the violation, and then chose not to act on the systemic causes.

By knowingly refusing to remedy the situation despite this formal admission, **this conduct profoundly undermines public confidence in the administration of justice**. It falls unacceptably below the high standards of integrity, impartiality, and diligence required of a federally appointed judge, thereby meeting the threshold for Council intervention under section 80 of the Judges Act.

EXHIBIT 1 — "THAT'S THE DEADLOCK" — THE CENTRAL ADMISSION

BY THE COURT (JUSTICE PERREAULT):

> *« And that's the deadlock.* ***It's the deadlock because... you can't do something the law doesn't allow, that's obvious. But the way the law is made, it imposes deadlocks.*** *»*

Transcript p. 168-169 — September 14, 2023

> **Finding:** The judge herself speaks the word "deadlock" and acknowledges that **the law itself creates these deadlocks**. This is not the complainant's interpretation — these are the judge's own words. She sees the systemic problem. She names it. She acknowledges that the legal structure imposes these blockages. And yet, she will choose to render only an individual remedy.

EXHIBIT 2 — "THE DEADLOCK IS SYSTEMIC"

BY THE COURT (JUSTICE PERREAULT):

> *« The problem I see is that yes, there is... there is perhaps a deadlock.* ***But the deadlock is systemic, it's not caused by one person.*** *»*

Transcript p. 211 — September 14, 2023

> **Finding:** The judge explicitly acknowledges that the deadlock is **systemic** — it is not caused by one person. This is exactly what the complainant documented with his 23+ deadlocks. The judge confirms his thesis. And yet, she will refuse to address the systemic nature and limit herself to an individual remedy. Her own diagnosis contradicts her own order.

EXHIBIT 3 — "IT'S AN OBLIGATION, OBLIGATION"

BY THE COURT (JUSTICE PERREAULT):

> *« Mais c'est surtout que j'ai aucune certitude qu'on a fait le maximum pour contrer ce problème-là parce qu'on le met dans un lot avec les aires communes, avec... c'est comme considéré un peu au même niveau qu'avoir accès à la salle pour ses documents de travail.* ***Mais c'est pas ça là, c'est une obligation, obligation.*** *»*

Transcript p. 234, ll. 5-11 — September 14, 2023

> **Finding:** The judge repeats the word "obligation" twice. She has no doubt. She knows this is not a matter of administrative discretion — it is a non-negotiable right. Despite this absolute certainty, she will refuse to address the 23+ systematic deadlocks demonstrating this obligation is violated daily for thousands of persons.

EXHIBIT 4 — "THREE MEALS A DAY"

BY THE COURT (JUSTICE PERREAULT):

> *« C'est comme si on me disait qu'on n'a pas assez d'agents pour leur donner trois (3) repas par jour. Je m'excuse, il faut qu'ils mangent trois (3) repas par jour. Et ça, je pense qu'on n'y va pas parce qu'on sait que ça serait tellement clair, là.* ***Mais là on a un article qui est écrit noir sur blanc, il n'y a pas aucune interprétation possible.*** *»*

Transcript p. 234, ll. 12-18 — September 14, 2023

> **Finding:** The judge herself compares the right to outdoor exercise to the right to food. She says: "there is no possible interpretation." If no interpretation is possible, then the 23+ documented deadlocks are not administrative problems — they are systematic violations of a right she herself called as fundamental as eating.

EXHIBIT 5 — THE ATTORNEY GENERAL'S ADMISSION

BY ME RENY (ATTORNEY GENERAL OF QUEBEC):

> *« Parce qu'effectivement, **l'article 10 n'est pas respecté.** »*

Transcript p. 233, ll. 6-7 — September 14, 2023

BY THE COURT (JUSTICE PERREAULT):

> *« **Non**, l'article... »*

Transcript p. 233, ll. 8-9

BY ME RENY:

> *« **Il ne l'est pas.** »*

Transcript p. 233, ll. 10-11

> **Finding:** The government's own prosecutor — the adversary in the case — **admits the law is not being respected**. The judge confirms. This exchange leaves no room for ambiguity. The right is being violated. Both parties said so. And yet, the judge will choose to grant only an individual remedy, allowing the system to continue violating the rights of 3,000+ persons.

EXHIBIT 6 — THE "MICRO-MANAGEMENT" EXCUSE

BY THE COURT (JUSTICE PERREAULT):

> *« Est-ce qu'on fait de la micro-gestion d'un établissement, ce que les tribunaux ne peuvent pas faire, et avec respect et égard, vous et moi, nous n'avons pas l'expertise requise pour réorganiser l'aménagement de l'alternance des secteurs et tout ça là. »*

Transcript p. 231, ll. 3-9 — September 14, 2023

> **Finding:** The applicant was not asking the Court to "micro-manage" the facility. He was asking the Court to **acknowledge that 23+ systematic deadlocks against humanitarian rights constitute a structural problem** that goes beyond his individual case. To characterize this request as "micro-management" is to say that demanding respect for fundamental rights is "micro-management." This is precisely the reasoning the Court of Appeal has criticized.

EXHIBIT 7 — "ONLY PART OF IT"

BY MR. PEREZ:

> *« You accept... so basically, you accept the... are you granting the habeas corpus? »*

BY THE COURT (JUSTICE PERREAULT):

> *« **Only part of it**, but I'm granting it, yes in part. »*

Transcript p. 255-256, ll. 21-24 — September 14, 2023

> **Finding:** A man represents himself, from a prison cell, to defend the rights of thousands of detained persons. He brutally established over 23 systematic deadlocks. The judge compared the violated right to food, said there was "no possible interpretation," and the government's own prosecutor admitted the violation. Despite all of this, the judge grants him only outdoor exercise — for himself alone — "only part of it." The 23+ systematic deadlocks? Ignored. The 3,000+ other persons? Abandoned.

EXHIBIT 8 — THE FORMAL DECISION

BY THE COURT (JUSTICE PERREAULT) — DECISION:

> *« So, I will GRANT the application on one ground: the lack of access to the exterior court one hour a day, and that's in conformity with Section 10 of Le règlement d'application de la Loi du système correctionnel du Québec [...] I will DISMISS ground 2 concerning the average of ten (10) hours outside the cell of detained persons because I come to the conclusion that the authorities have demonstrated that this privation that is legal. »*

Transcript p. 257, ll. 5-14 — DECISION — September 14, 2023

BY THE COURT (JUSTICE PERREAULT):

> *« So, I'm going to render only the conclusion of my judgment.* ***Ça va être avec motifs à suivre*** *because I think I should render my decision right now. »*

Transcript p. 256, ll. 10-12

> **Finding:** The judge renders her decision orally, with "reasons to follow." Full written reasons were not provided. A habeas corpus decision — involving the fundamental liberty of a human being — is rendered without written reasons, preventing effective judicial review. The Court of Appeal has stated that orders must be "clearly and unequivocally defined" to be enforceable.

EXHIBIT 9 — "FOUR-FIVE YEARS" WITHOUT MAXIMUM EFFORT

BY THE COURT (JUSTICE PERREAULT):

> *« Si ç'avait été un phénomène des six (6) derniers mois ou de la dernière année, j'avoue peut-être que mon appréciation des faits aurait été différente.* ***Mais là on parle de quatre, cinq (4-5) ans.*** *»*

Transcript p. 234, ll. 1-3 — September 14, 2023

BY THE COURT (JUSTICE PERREAULT):

> *« Mais c'est surtout que* ***j'ai aucune certitude qu'on a fait le maximum pour contrer ce problème-là.*** *»*

Transcript p. 234, ll. 5-6

> **Finding:** The judge herself acknowledges the problem has persisted for 4-5 years and she has "no certainty" that the State has done everything possible. This is not a temporary issue — it is a chronic institutional failure. She sees it. She says it. Then she renders an individual order that resolves nothing about the systemic problem.

THE FUNDAMENTAL CONTRADICTION

Justice Perreault spoke the following words in the same hearing:

*1. "That's the **deadlock**... the law imposes deadlocks" (p. 168-169) — She names the problem.*
*2. "The deadlock is **systemic**, it's not caused by one person" (p. 211) — She confirms it's structural.*
*3. "It's an **obligation, obligation**" (p. 234) — She knows it's non-negotiable.*
*4. "There is no possible **interpretation**" (p. 234) — She knows the law is clear.*
*5. "I have no certainty they did the **maximum**" (p. 234) — She knows the system failed.*
*6. "We're talking **four, five years**" (p. 234) — She knows it's chronic.*
*7. The AG prosecutor says: "Section 10 is **not being respected**" (p. 233) — Even the adversary admits it.*

AND YET: she grants only an individual remedy. The 23+ systematic deadlocks — presented by a man representing himself from a prison cell — are ignored. 3,000+ persons continue to suffer the same violations.

THE COMPLAINANT REPRESENTED HIMSELF — FROM HIS CELL

An essential fact must be emphasized, as it amplifies the gravity of the judicial conduct at issue:

Danny William Perez represented himself at both Habeas Corpus hearings on September 14 and October 27, 2023. He had no lawyer. He argued from his prison cell. He prepared his own arguments, presented his own evidence, and documented the 23+ systematic deadlocks himself — all without any legal assistance.

Despite this, the judge acknowledged the validity of his arguments through her own words. The government's own prosecutor admitted the violation. And yet, the remedy granted was minimal and individual — as if a man representing himself from prison

did not deserve to have his arguments, *acknowledged as valid by the Court itself*, fully considered.

The firm Dufresne | Wee s.e.n.c.r.l. (Me Justin Wee, Me Audrey Labrecque, Me Jérôme Aucoin) represents Mr. Perez solely in the class action 500-06-001298-245, retained *subsequent to* the Habeas Corpus hearings. **No member of this firm was present or retained during the hearings that are the subject of this complaint.**

LEGAL BASIS FOR THE COMPLAINT

⚖ Judges Act, R.S.C., 1985, c. J-1 — Right to complain to the Canadian Judicial Council

⚖ Review Procedures (2025) of the Canadian Judicial Council — effective April 9, 2025 — Procedures for the Review of Complaints or Allegations About Federally Appointed Judges

⚖ Ethical Principles for Judges (CJC), Principle of Respect for the Law — "The judge should render justice within the framework of the law"

⚖ Ethical Principles (CJC), Principle of Integrity — "The judge should perform the duties of his office with integrity, dignity and honour"

⚖ Ethical Principles (CJC), Principle of Impartiality — "The judge should be, and be seen to be, impartial and objective"

⚖ Ethical Principles (CJC), Principle of Diligence — "The judge should perform his judicial duties with diligence and devote himself entirely thereto"

⚖ Ethical Principles (CJC), Principle of Reserve — "In public, the judge should act in a reserved, serene and courteous manner"

⚖ Ethical Principles (CJC), Principle of Independence — "The judge should uphold the integrity and defend the independence of the judiciary, in the best interest of justice and society"

⚖ Preamble to the Canadian Charter of Rights and Freedoms — "Whereas Canada is founded upon principles that recognize the supremacy of God and the rule of law"

⚖ Constitution Act, 1982, s. 52(1) — "The Constitution of Canada is the supreme law of Canada, and any law that is inconsistent with the provisions of the Constitution is, to the extent of the inconsistency, of no force or effect"

⚖ Canadian Charter of Rights and Freedoms, s. 12 — Protection against cruel and unusual treatment

⚖ Quebec Charter of Human Rights and Freedoms, s. 1 — Right to life, security and liberty

⚖ International Covenant on Civil and Political Rights, art. 10 — Treatment of detained persons

⚖ Nelson Mandela Rules, Rule 23 — Right to at least one hour of outdoor exercise per day

⚖ Quebec Correctional System Act, s. 22.1 — Rights of incarcerated persons

⚖ Application Regulation, s. 10 — Outdoor walk or exercise of at least one hour per day

SUPPORTING EVIDENCE

The full evidence is available in the public evidence dossier.

📄 Official transcription — Habeas Corpus #1 — September 14, 2023 — 284 pages (court reporter Paulette Houde)

🔊 Audio recording — Habeas Corpus #1 (MJQ333783) — September 14, 2023 — 2 tracks

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🔊 Audio recording — Habeas Corpus #2 (MJQ354937) — October 27, 2023 — 3

tracks

📄 Out-of-court examination of Danny W. Perez — February 13, 2026 — Me Hébert (4 defense lawyers)

📄 Class action authorization judgment — December 12, 2024 — Justice Lukasz Granosik

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📄 Statement of claim — March 12, 2025

📄 23+ systematic deadlocks documented on the record — against all humanitarian logic

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RELIEF SOUGHT

1. That this complaint be received and processed in accordance with the *Review Procedures (2025)* of the Canadian Judicial Council, effective April 9, 2025;
2. That the Council examine the conduct of Justice Perreault during the Habeas Corpus hearings of September 14 and October 27, 2023;
3. That the Council note the contradiction between the judge's words (acknowledging the severity and systemic nature of the problem) and her decision (addressing only the individual case);
4. That the Council note the refusal to acknowledge the 23+ documented systematic deadlocks, despite overwhelming evidence and the admission of the opposing party;
5. That the Council note the absence of complete written reasons for a habeas corpus decision;
6. That the complaint be referred to a review panel pursuant to section 98 of the Judges Act, should the Council determine that the conduct may constitute a lapse within the meaning of the Act;

7. That the Council order appropriate measures, including a reprimand, corrective measures, or any other sanction provided for under the Judges Act;
8. That the 23+ systematic deadlocks be formally acknowledged and integrated into the class action file 500-06-001298-245;
9. Any other relief the Council deems appropriate.

Respectfully submitted,

_____

Danny William Perez
Designated Plaintiff
Class Action 500-06-001298-245

Represented by:
Dufresne | Wee s.e.n.c.r.l.
Me Justin Wee — jw@adwavocats.com

⚖ L'Avocat

Justice and legal accountability platform. Alfred watches.

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580 rue Ontario Est, Montréal
jw@adwavocats.com
514 527-8903

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> *They break in pieces thy people, O LORD, and afflict thine heritage.*
>
> — Psalms 94:5 · AKJV

THE FOUR CORNERS OF THE KINGDOM

🌐 **GoSiteMe**
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💻 **Alfred Linux**
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The Worlds

THE NINE PILLARS · FRUITS OF THE SPIRIT (GAL 5:22-23)

🙏 Faith

⚡ AI Ecosystem

👑 Identity

💰 Commerce

🎬 Creative

🖥️ Infrastructure

🛡️

🏛️

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Security	Sovereignty	Payment Sovereignty