

Notice of Complaint by the Law Society of New Brunswick

This decision forms part of Courtready.ca's Canadian AI-Hallucination Cases Database, which tracks Canadian legal decisions addressing fabricated citations and other misuse of artificial intelligence in legal submissions. Courtready.ca obtained this decision from the Canadian Legal Information Institute (CanLII).

FULL DATABASE

<https://courtready.ca/fictitious-citations-in-canadian-courts/>



FORM 22 NOTICE OF COMPLAINT

Under Section 56 of the *Law Society Act, 1996*.

In the Matter of a Hearing by a Panel of the Discipline Committee into the conduct of **DENIS SAWYER**.

1. A Discipline Committee panel will be constituted under the *Law Society Act, 1996*, to inquire into the charges that Denis Sawyer has conducted himself in a manner deserving of sanction.
2. The charges against Denis Sawyer that are being referred to the Discipline Committee for hearing are as follows:

2.1 Submitted fictitious citations to the New Brunswick Provincial Court

- a. On or around April 29, 2025, Mr. Sawyer signed and filed a brief with the New Brunswick Provincial Court. Ten out of twelve citations in his brief were fictitious.
- b. When Mr. Sawyer was informed of this, he filed a subsequent brief, in which he removed almost all fictitious citations except for two, to one of which he attributed a quote.
- c. At the hearing, at opposing counsel's request, Mr. Sawyer disavowed both briefs and asked the Court to only consider his oral submissions.

- d. Mr. Sawyer's submitting fictitious citations to the Court is contrary to Rules 2.1-1 (Integrity), 3.1-2 (Competence), 3.2-1 (Quality of Service), and 5.1-1 (Advocacy) of the 2023 *Law Society of New Brunswick Code of Professional Conduct* (the "Code").

2.2 Used generative artificial intelligence in an incompetent manner

- a. Mr. Sawyer used generative artificial intelligence in the preparation of his briefs and did not properly review the products before submitting them to the Court.
 - b. Mr. Sawyer's failure to use generative artificial intelligence in a competent manner is contrary to Rules 2.1-1 (Integrity), 3.1-2 (Competence), 3.2-1 (Quality of Service), and 5.1-1 (Advocacy), as well as Appendix B – Guidelines on Ethics and New Technology, of the *Code*.
3. Joël Michaud, K.C., and Destiny Grant, of Pink Larkin in Fredericton, New Brunswick, have been appointed counsel to the Law Society for the hearing of this complaint.
 4. Mr. Sawyer is advised that:
 - a. under subsection 56(3) of the *Law Society Act, 1996*, Mr. Sawyer is required to file a reply to this Notice with the Registrar within 20 days of service of this Notice of Complaint in which he shall admit any charges that are true or give an explanation of any charges that are not true. Mr. Sawyer is entitled to issue documents and present evidence in the proceeding in English or French or both, and should indicate the official language in which he wishes the hearing to be held;
 - b. under subsection 56(4.1) of the *Law Society Act, 1996*, if Mr. Sawyer fails to file a reply, he shall be deemed to admit all the charges in the Notice of Complaint;
 - c. the Law Society intends to proceed in the English language, however;
 - d. if Mr. Sawyer requires the services of an interpreter, he must advise the Registrar of the Law Society at least 7 days before the hearing.

THIS PUBLIC NOTICE MADE this 22nd day of July 2026.

Joleen Dable
Registrar of Complaints
Law Society of New Brunswick