The Law Society of Manitoba

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AUGUST 2026

Communiqué

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During the "Ours to Protect" campaign on the rule of law, one sentiment I have heard, put a couple of different ways, is along the lines of "silence is acquiescence" (or if one prefers the inflammatory, "silence is oxygen to the fire"). The Law Society takes this approach when it sees an encroachment on the rule of law.

The Manitoba Bar Association (with the Canadian Bar Association) is the voice of the legal profession. They unabashedly advocate for lawyers. The Law Society's job is to protect the public interest and to ensure Manitoba's lawyers are ethical and competent. Even after volunteering with the Law Society for years, and even if I am expecting a call from someone at the Law Society, I still experience momentary panic when I see the call display. While the Law Society does not advocate for lawyers, it does not ignore their interests either. More than just regulate lawyers, it educates them and supports them. Happy, healthy, educated lawyers make for a well-served public.

If one were to do a poll of the profession, I expect we would find that the Law Society does a pretty good job most of the time. We could expect there would be some outliers, as one finds in every poll. (I recall reading somewhere that pollsters expect that every option in a poll will have a 4% take-up, such that one poll of Americans showed that 4% of them have been decapitated. I don't think I've made this up.) The Law Society is not commissioning a poll, and despite every president's message ever inviting feedback and questions, silence is the default response.

Silence from members may be a sign that ours is the best of all possible law societies. More likely, people have better things to do and are happy to acquiesce to what the Law Society does and how it does it.

PRESIDENT'S REPORT continued...

Starting this autumn, I hope to visit as many firms and legal departments with CEO, Leah Kosokowsky, as we can to discuss the Law Society. We will sit down with managers and managing partners to remind them what resources we have available and to hear what we might do better. Keeping in mind our mandate and Manitoban-frugality, is there something the Law Society does not do that it should? Is there something it could do better? Is there some unreasonable burden put on firms that could be improved? What issues do the profession see now or coming that the Law Society could address? We should be sending out the first batch of emails to set up meetings in the coming months. Yes, those emails will acknowledge firms exist outside the perimeter as well.

Please give some thought to what the Law Society does and how it could improve. Electronic funds transfers for trust money is one recent example of a change at the Law Society driven by the profession. Share your thoughts at a meeting or send them to me. I am happy to hear from you, even if it is to say ours is the worst of all possible law societies. Silence is acquiescence, otherwise you can find me at 204-947-6805 or kmandzuik@traditionlaw.ca.

Enjoy the last bits of summer.

Congratulations

PRIZE WINNERS

The following Law Students were the 2026 recipients of the Law Society Awards for the highest standings in third year law:

1st Place:
Margaret Hypatia Crawford Award
Jayden Kyryluk

2nd Place: **Vanessa Smith**
3rd Place: **Tesia Romaniw**
4th Place: **Sameer Smith**

President Ken Mandzuik (centre) had the pleasure of officially congratulating Tesia Romaniw (left) and Jayden Kyryluk (right) on their achievements at the June bencher meeting.

CEO'S MESSAGE

LEAH KOSOKOWSKY

After seeing many years of increases in the utilization rate of the Health and Wellness Program, the Law Society observed a decline for the second year in a row.

As I write this report, I am hoping that you are enjoying the beautiful summer weather, which seemed to take so long to arrive.

The Law Society held its annual meeting on June 18, 2026 during which benchers and members received the 2025-2026 annual report and approved of the audited financial statements for the 2025-2026 fiscal year.

Within the annual report you will find details regarding the core operational functions of the Law Society over the course of the year, including new statistics on the contacts made with the Practice, Ethics and Equity Advisor who provides advice and direction on practice, ethics and equity matters. In addition, you will see reports on the progress made on the 2025-2028 strategic plan. Two initiatives are worth highlighting.

First, observing the escalating threats to the independence of the judiciary and concomitant increases in the distrust of institutions generally, the Law Society of Manitoba led a coalition of Canadian law societies to educate and unite Canadians on the rule of law and how it underpins a healthy democracy.

The Ours to Protect campaign was a tremendous success, surpassing all expectations, with over 26 million views of the anthem video and 135 million digital ad impressions. The campaign, with a shift to the education of youth, will continue into the next year.

CEO's MESSAGE continued...

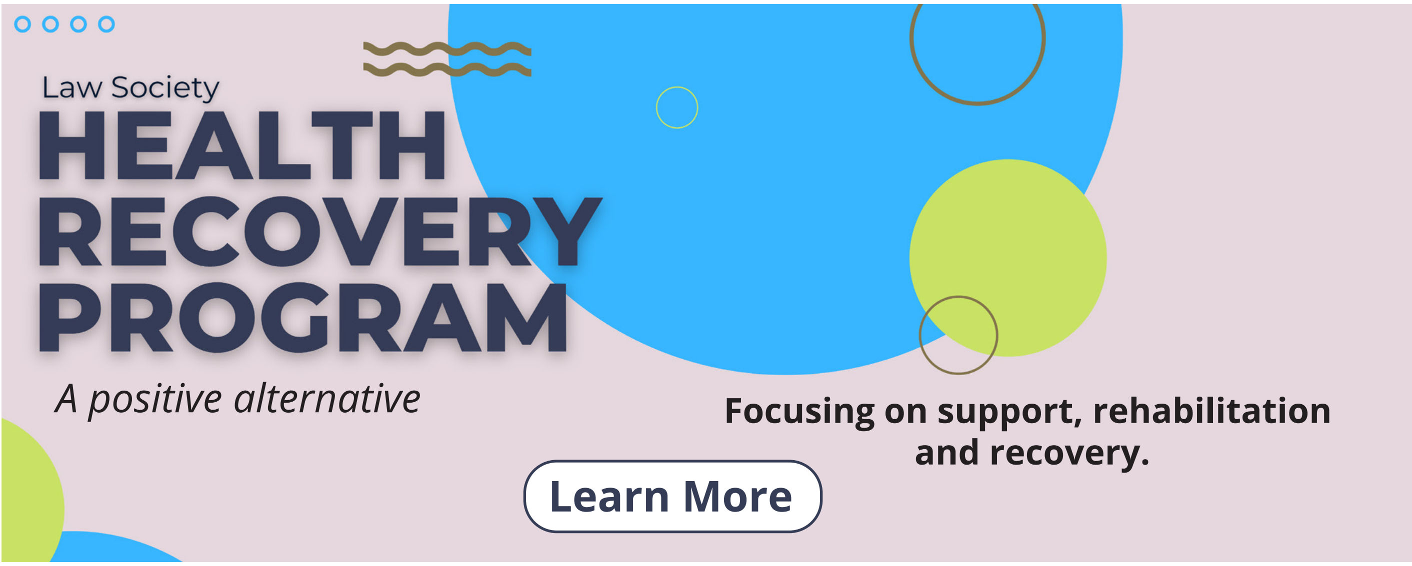
Secondly, concerned with the existential crisis concerning access to justice by Manitobans, the Law Society embarked on an initiative intended to break down the silos in which pro bono legal services are delivered and to create a comprehensive ecosystem of services providers that focus on the whole person seeking assistance. This is a multi-year initiative with multiple stakeholders. However, 2025-2026 saw the foundation laid by broad consultation with the community which is reflected in the **What We Heard Report** available in both English and French.

Following the annual meeting, the benchers welcomed Federation of Law Societies of Canada President, Louis-Martin Beaumont and Chief Executive Officer, Jonathan Herman to the bencher meeting where they provided updates on the work of the Federation, including court applications to preserve solicitor and client privilege in amendments to the *Income Tax Act*, government relations in the anti-money laundering portfolio to protect the public while preserving solicitor and client privilege, and ongoing improvements to the work of the National Committee on Accreditation.

The benchers also received a monitoring report on the Law Society's work to support the well-being of the profession through the Manitoba Blue Cross Health and Wellness Program, Law(yer) Strong – the peer support program – and through the Law Society's Health Recovery Program.

After seeing many years of increases in the utilization rate of the Health and Wellness Program, the Law Society observed a decline for the second year in a row. We will continue to monitor the effectiveness of the program and make adjustments as necessary.

Elsewhere in this edition, you will find an article regarding the excellent work of the Health Recovery Program, a program to divert out of complaints and discipline, lawyers whose conduct concerns are connected to a health issue. Since its inception in 2022, the program has assisted a number of lawyers experiencing a variety of health issues, thereby allowing them to continue to practise safely and effectively.



KEEPING TRUST MONEY SAFE

TANA CHRISTIANSON, Director - Insurance

I was writing a Communiqué article on how to avoid falling victim to a social engineering fraud when my phone rang. It was a Manitoba law firm putting the Law Society on notice that they had mistakenly sent $144,000 to a fraudster. Oh, poop.

Let's use this unfortunate real-life example to demonstrate how these social engineering frauds work and what you can do to keep your client's money safe.

The fraudster sets up the scam: In this case, the fraudster infiltrated an assistant's email account (although sometimes the email account hacked is the client's or even opposing counsel's email). The fraudster had been monitoring the hacked email account, waiting for the perfect opportunity to misdirect funds into their own pocket. Fraudsters may lie in the weeds of the email account for months, using algorithms and AI to screen for content relating to payments, deposits or account numbers.

When the assistant sent an email to the client saying their funds could now be paid out, the fraudster intercepted it and sent an email back with payment instructions. That email looked like it came from the client, but the client's email address was spoofed. The fraudster's email gave the assistant the coordinates to transfer the funds to a bank account, which of course was the fraudster's account. Usually, the fraudster's intercepting email is changing banking instructions previously received from the client in person at the initial meeting. In this case, there were no payment instructions on file.

The law firm falls for the scam: The fraudster was counting on the assistant to accept the emailed payment instructions. Fraudsters know that law firms are busy places and lawyers like to keep clients happy. And unfortunately, in this case, the firm's internal controls were flawed and the assistant was following what was, at the time, accepted and common internal practice at this firm. So the accommodating assistant accepted the instructions and sent the money to the fraudster, not the client. I repeat, oh poop.

KEEPING TRUST MONEY SAFE continued...

This fraud could have been avoided. Here's how:

1. The assistant should have contacted the client using the phone number noted when the file was opened. The client would have confirmed the email did not come from them.

2. The firm's accounting staff and the lawyers signing off on the trust transfer should have required the assistant to confirm that they had properly verified the payment instructions with a phone call. Verification is important for any payment instructions, whether they are initial or changed.

3. The firm should have had a protocol that **all** payment instructions and changes to payment instructions must be provided either in person or on a video conference call where identity can be confirmed or by calling the phone number on the file, not using contact information which was provided in the payment instruction email. And because it is easy for a fraudster to spoof a phone number or name on call display and even deep fake or clone a voice, a call into the law firm is not acceptable verification. An added safeguard might be creating a password or secret question arranged at the first client meeting and recorded on a paper file.

But the assistant accepted the payment instructions by email, without appropriate verification, and so the funds were paid out to the fraudster, not the client. Usually, by the time anyone realizes that a fraud has been committed, it is too late to get the money back. Big win for the fraudster and a big loss for the law firm.

Social engineering frauds like this can also be a big loss for the Law Society Insurance Fund and the Canadian Lawyer's Insurance Association. Because the client's funds are lost due to the negligence of the lawyer or the staff they supervise in not properly verifying the instructions, either the lawyer's client on that transaction or other clients who have money in the lawyer's trust account suffer a loss. The law firm is obligated to make the client whole. A claim might be made against the lawyer's insurance, which may or may not provide coverage, depending on the circumstances.

The misdirected funds are often proceeds of a real estate transaction or settlement funds in litigation files. The sheer size of these claims and their increasing frequency pose a significant risk to lawyers' insurance programs across the country. Although there may be coverage under the CLIA policy, depending on the facts, insurers in other provinces are no longer covering such claims, or they have capped the amount of coverage in the $250,000 to $500,000 range, or they have larger deductibles (up to 30% of the loss), and most will not pay at all unless the firm can demonstrate that all the appropriate steps were taken to verify the changed instructions. While CLIA is not changing its policy at this point, we all need to do our part to avoid claims.

News

KEEPING TRUST MONEY SAFE continued...

Here is what you can do to avoid falling victim to a payment re-direction fraud:

1. Have a firm-wide protocol in place which all members and employees of the firm and each new hire must read and acknowledge. Agree that no funds will be transferred unless documented and verified instructions are on the file. This is particularly important where there is a change in payment instructions, even if that change in payment instructions comes from or appears to come from the lawyer or partner handling the file. NO EXCEPTIONS - even for 'good' clients or managing partners.

2. The policy should state that if you did not receive payment instructions at the time you met with the client initially, any new or differing instructions about transferring trust funds must be verified through direct phone, video conference or in-person contact. You must initiate the phone contact with your client (or the bank or another lawyer) in person or by using the original phone number on the file or the original phone number from a reliable directory, like the Law Society's Lawyer Look-Up.

   The policy should confirm that you cannot rely on instructions you receive from a client returning your call. That call is likely to come from the fraudster. If you're leaving a message, let the client know you will be calling again and to watch for your call or have them call or email you with a time they will be available to take your call back to them.

3. The policy might consider whether you should have the client set a password or pick a secret question and answer and record it on the physical file. Make the client use it to confirm subsequent instructions.

4. The policy should confirm that you never use the contact information provided in the instructing email. Go back to the original file for the real number.

To track the steps taken to verify instruction before you pay out, consider developing a checklist like this or see the Law Society of BC's Funds transfer verification checklist.

Celebration of Justice Glenn Joyal's Appointment to the Supreme Court of Canada

Join us for a special reception and dinner celebrating the appointment of the Honourable Justice Glenn Joyal, former Chief Justice of the Manitoba Court of King's Bench, to the Supreme Court of Canada.

We are delighted to welcome the Right Honourable Richard Wagner, P.C., Chief Justice of Canada, who will bring remarks along with other special guests.

Brought to you by Manitoba's Court of Appeal, Court of King's Bench, and Provincial Court, in partnership with the Manitoba Bar Association and the Law Society of Manitoba.

October 29 | 6:00 PM

York Ballroom, RBC Convention Centre

GET TICKETS

NEW

Foreign Influence Transparency and Accountability Regime Comes into Force

On August 4, 2026, the *Foreign Influence Transparency and Accountability Act* ("FIT-AA") and its associated Regulations came into force. The FITAA establishes a public registry whereby any "person" who enters into an "arrangement" with a "foreign principal" must register and provide certain information to the Foreign Influence Transparency Commissioner for inclusion in the registry.

Read More Here

THE PATH: *Looking Back and Moving Forward*

BETTA WISHART,
Policy Counsel and Conseillère des services en langue française

Art by Colleen Gray

Introduction of The Path

In October 2023, the Law Society launched The Path, a one-time mandatory Indigenous intercultural awareness and competency training course for all practising lawyers in Manitoba.

Developed by NVision Insight Group, Inc., a majority Indigenous-owned firm, the course was designed to help Canadians increase their Indigenous cultural understanding, focusing on Canadian history and contexts and has been offered by the Canadian Bar Association since 2020.

The Law Society's Indigenous Advisory Committee (IAC), under the guidance of then Chairperson, the Honourable Murray Sinclair, and Vice Chairperson Jessica Saunders, worked closely with NVision for over a year to incorporate additional Manitoba-specific content to enhance the course.

Introduction of The Path helped us respond to several Truth and Reconciliation Commission (TRC) Calls to Action; in particular, #27 which calls upon law societies to:

"...ensure that lawyers receive appropriate cultural competency training, which includes the history and legacy of residential schools, the United Nations Declaration on the Rights of Indigenous Peoples, Treaties and Aboriginal rights, Indigenous law, and Aboriginal-Crown relations."

THE PATH: Looking Back and Moving Forward continued...

Knowledge of Indigenous peoples' history, cultures, perspectives and governance systems is a critical gap in education for most of us, and it ties directly into the competence of the legal profession. **Statistics Canada estimates that by 2036 one in five Manitobans will be Indigenous.** If you haven't already, it is likely that at some point you will have an Indigenous client or be involved in a matter with an Indigenous person or organization.

What Have We Heard From You So Far?

Overall, the profession has been highly engaged in completing the course, with 99% having fulfilled this educational requirement. To date, 2,485 practising members have completed The Path.

We also appreciate the strong response rate of approximately 50% to our voluntary post-course survey. More than 1,100 of you took the time to answer questions that largely required narrative responses. The feedback told us that most felt more informed about Indigenous history, issues and perspectives.

95% of respondents indicated that The Path was helpful in increasing their Indigenous cultural awareness.

83% of respondents indicated that the information will impact how they conduct their legal practice. Many noting it will assist them in their family law, criminal law, employment law, real estate, and in-house practices.

Beyond practical knowledge gains, comments related to the following themes:

- enhanced cultural awareness and sensitivity;
- improved client service capabilities;
- deeper historical understanding; and
- personal and professional growth, notably in bringing greater care, compassion and humility to dealings with Indigenous colleagues and clients.

IAC Chairperson, Jessica Saunders, notes that:

The Honourable Murray Sinclair – Mazina Giizhik, the One Who Speaks of Pictures in the Sky – believed that "*Education got us into this mess and education will get us out of it". He reminded us that reconciliation is not an Indigenous issue but a Canadian one, and "It involves all of us.*"

It was after much deliberation that the IAC reached consensus and remained steadfast in the recommendation that intercultural awareness and competency education must be mandatory for all lawyers in Manitoba. That 95% of the 1,100 members who have completed the voluntary survey found The Path helpful, is not simply an encouraging result. It is confirmation that more in the profession are open to learning and being involved in this work.

THE PATH: Looking Back and Moving Forward continued...

What Other Intercultural Awareness and Competency Education Would You Find Helpful?

A wide range of responses to this survey question have been received, including:

- requests for regular updates to The Path or for other courses like it, with more information on Indigenous legal traditions, treaties, Indigenous governance, the TRC Calls to Action, and Missing and Murdered Indigenous Women and Girls initiatives.
- guidance about the impact of Aboriginal Law and Indigenous Law on specific areas of practice.
- a preference for future learning to allow for interaction and discussion with Elders, Knowledge-Keepers and Indigenous instructors.
- an interest in gaining first-hand exposure to Indigenous cultural activities and events.

In addition to Indigenous-related education, there were broader requests for training in intercultural communication, implicit bias, and trauma-informed practice.

Where Do We Go From Here?

We appreciate the profession’s engagement with and responsiveness to The Path. Your feedback will help the IAC as it develops recommendations on where the Law Society should focus next.

TRC Call to Action 27 provides that appropriate cultural competency training “*[w]ill require skills-based training in intercultural competency, conflict resolution, human rights and anti-racism.*” This has already been the subject of some discussion around the IAC table as providing guidance for next steps.

The Path is intended as a starting point. It serves as a basic foundation on which our profession can build its Indigenous intercultural awareness and competency. The Law Society will continue to expand educational content by incorporating these topics into our resources, and highlighting community resources.

Jessica Saunders offers a message of hope and thanks:

Rooted in the same principles as reconciliation, the journey of intercultural awareness and competency education is one of relationship – it is not just a course we complete, but a responsibility we all carry. The relationship becomes stronger as we continuously listen, learn, and grow through humility, courage and respect. We hope that what was learned in The Path, walks with members of the profession into courtrooms, boardrooms and communities and shows up in the way we see and support those we serve.

Tapwe Kiche/Miigwech/Maarsii/Mahsi Cho/Thank you to the IAC, the Law Society, and the members for honouring Murray’s legacy and calls for truth and reconciliation through action within the profession.

The LAW SOCIETY *Medal*

Presented to
Barney Christianson, KC

Law Society President, Ken Mandzuik, KC presented the Law Society Medal to Barney at the President's Reception on June 19th.

2026 ANNUAL REPORT

Our 2026 Annual Report highlights how the Law Society of Manitoba is advancing equity, diversity and inclusion while working to improve access to justice for Manitobans. Take a look.

VIEW REPORT

Law Society President, Ken Mandzuik, KC, addressed the candidates and guests.

Guest speaker, The Honourable Justice Elissa Neville.

Greetings from the Manitoba Bar Association's President, Stacey Soldier.

On June 19, 2026, a total of 98 candidates were formally presented to the Court of King's Bench during the Call to the Bar ceremony held at the RBC Convention Centre in Winnipeg. Each candidate took the Barristers and Solicitors Oath. The proceedings were presided over by Chief Justice Glenn Joyal, who was then the Chief Justice of the Court of King's Bench of Manitoba, before being appointed to the Supreme Court of Canada. The Honourable Justice Elissa Neville delivered an address to the newly called members of the legal profession.

Enjoy a brief video highlighting the event.

CALL TO THE BAR continued...

Congratulations

2026
A. Montague Israels, QC Prize Recipient

Lisa Haydey

The A. Montague Israels, Q.C. Prize is selected by a special Selection Committee and awarded annually to a student from the graduating class of the Bar Admission Course who demonstrates a sense of justice transcending technical competence. This award honours the memory of A. Montague Israels, Q.C. (1904-1973), recognizing those attributes that he valued and so well exemplified in his own life and career.

The award was presented by the Honourable Justice David Kroft.

Learn more about this year's recipient

News

CALL TO THE BAR continued...

SHARING THE MOMENT WITH FAMILY, FRIENDS, AND COLLEAGUES

FOLLOWING PRECEDENT

YOUNG LAWYERS CARRYING ON THE FAMILY TRADITION

CALL TO THE BAR continued...

2026 MASS CALL TO THE BAR

Congratulations to the following new lawyers!

Abbas, Touseef
Adeojo, Olanrewaju
Adurotoye, Adebola
Agu, Amobi
Ajari, Abiodun
Ajibola, Oyeyemi
Alder, Elise
Ali, Tariq
Alvarez-Mancia, Ivonne
Anderson, Zackery
Ayanru, Adetola
Azuonye, Uchenna
Bacchus, Maia
Balchan, Ravi
Bastin, Alexander
Belbas, Emily
Bell, Matthew
Blatta, Jessica
Borger, Alec
Bossuyt, Luke
Brown, Dylan
Brown, Liam
Burdz, Zachary
Chen, RuiZhi
Choudhury, Sadia
Comeau, Madeline
Csincsa, Steven
Deleau, Luc
Dizon, Stephanie
Drysdale, Jadianne
Dueck, Nathan
Ferbers, Skylar
Findlay, Gillian
Friesen, Maureen
Froese, Willow
Garcia Manzano, Maria
Giesbrecht, Connor
Golletz, Nicole
Halaburda, Madison
Harley, Meredith
Haydey, Lisa
Hodgins, Lauren
Jaleel, Humaira
Johnson, Tyler
Kaur, Baljinder
Kennedy, Moira
Khandelwal, Isha
Knox, Alli
Kozak, Anna
Krowiak, David
Kumar, Muskan
Kwasnica, Julia
Lafond, Carly
Lathlin, Mary-Charlet
Law, Landon
LeBlanc, Lindsay
Ly, Nicholas
Macaraeg, Darwin
Mann, Sydney
McGinnis, Kim
McNaughtan, Micayla
Miller, Kelci
Molokwu, Onyinyechukwu
Moon, Eric
Morris, Harlan
Newman, Sydney
Nynych, Kirsten
Obure, Roy
Okereke, Chukwudi
Okereke, Somtochukwu
Okubule, Bukola
Palmer, Emily
Pearce, Samantha
Peterson, Heather
Ransom, Carson
Rosenthal, Daniel
Sarmiento, Denise
Schumacher, Madison
Shector, Jenessa
Sheraz, Muhammad
Sroay, Maninder
Taverner, Kassandra
Taylor, Brynn
Theathi, Simran
Thielmann, Brendan
Tichon, Brent
Toromade, Akeem
Tran, Jeremy
Wark, Daniel
Windsor, Jesse
Wobo, Inyefai
Wojnowski, Jeanna
Xiang, Yu
Yaremko, Hayden
Zarychta, Helena

CALL TO THE BAR continued...

Call to the Bar - Brandon, Manitoba

Congratulations to the following new lawyers who were called to the Bar in a special ceremony held in Brandon, Manitoba on June 12, 2026:

Olyuyinka Idowu
Easton Lacey
Ruban Satkunan
Lyric Stewart

Trent Sholdice presented the candidates to the Court.

Call to the Bar - Portage la Prairie, Manitoba

Congratulations to
Stefan Kriening
who was presented to the Court by Barney Christianson, KC and called to the Bar in a special ceremony held in Portage la Prairie, Manitoba on June 25, 2026.

CALL TO THE BAR continued...

Call to the Bar - Dauphin, Manitoba

Congratulations to
Maryam Khalid
who was called to the Bar
in a special ceremony held in Dauphin, Manitoba on July 29,2026.

THE MANITOBA ACCESS TO JUSTICE (A2J) INITIATIVE

RELEASES "WHAT WE HEARD FROM COMMUNITY REPORT"

The report summarizes key insights from a 15-month consultation with community members, frontline providers, and provincial and Indigenous governments on how to collaborate across complex systems to advance access to justice.

Review the comprehensive report.

ENGLISH FRENCH

Visit our website to learn more about this LSM Initiative.

THE HEALTH RECOVERY PROGRAM:
Focusing on Support, Rehabilitation and Recovery

JAMIE JURCZAK, Director of Regulation

The *Health Recovery Program* (HRP) launched in December 2022 to help improve and sustain the well-being of the legal profession. The HRP offers an alternative to the traditional complaints and discipline process where a member's health issues are directly related to their conduct or competency issues. Under appropriate circumstances, a lawyer may undergo healthcare treatment for their underlying health issues in lieu of going through the discipline process. Of course, lawyers don't need to be facing discipline in order to use the resources of the HRP – self-referral is an option under the program as well. We have a direct connection to a psychiatrist specializing in addiction and co-occurring disorders, who is willing to see any lawyer referred to their clinic.

The goal of the HRP is to create an environment in which the member can practice law safely through collaboration with the Law Society, the member and their caregivers.

Unique from Other Law Society Support Services

The HRP is a comprehensive program, and differs from other support programs such as the Blue Cross Employee Assistance Program (EAP) and the Law(yer) Strong Peer Support Program. However, the different programs can compliment each other and certainly can work hand in hand.

Treatment under the HRP is likely to be more extensive than the short-term counselling services offered by Blue Cross, and it will be tailored to the member's needs. It is possible that a member could begin their recovery process by using the Blue Cross EAP services and later switch over to the HRP if they require a more comprehensive treatment program.

THE HEALTH RECOVERY PROGRAM continued...

The Law(yer) Strong Peer Support Program consists of lawyer volunteers providing support to their colleagues in need. While these volunteers receive training, they are not healthcare professionals. Under the HRP, members will be referred to treatment provided by healthcare professionals. Again, a member could begin their recovery process by using the Peer Support Program and ultimately move to the HRP if needed.

HRP Guiding Principles

The focus is on a remedial approach, through early identification, referral and treatment for the member, where the member is cooperative in the process, has insight into their own health issues, and is compliant with treatment and rehabilitation. The HRP is guided by the following principles:

- **Confidentiality:** If a member is entering the HRP as an alternative to discipline, their participation will necessarily be disclosed to the Law Society and a limited number of other stakeholders as there will be reporting and monitoring requirements. Otherwise, participation by a member in the HRP will be considered a private and confidential matter. The Law Society will ensure that confidentiality measures are firmly in place to govern the collection and use of health or other personal information of the member. In the case of self-referral, while the initial contact is made through the Law Society, there is no reporting requirement.

- **Voluntariness:** The HRP is a voluntary program. First, the member must acknowledge and have insight into their own health issues. Second, the member must be willing to engage in a process that includes professional assessment, referral for treatment, and in some cases, reporting and monitoring. Further, in some situations it may be necessary to restrict a member's practice. A member must consent to all components of the process (including any conditions and restrictions, if applicable), and must continually cooperate throughout the treatment process.

- **Without Risk:** Members who participate in the program as an alternative to discipline will not be subject to worse regulatory outcomes than had they remained in the traditional discipline process. Conversely, if the HRP is offered as an alternative to discipline, the Law Society will not be inhibited in its ability to protect the public interest. Sanctions will not be imposed on a member for a failed attempt to complete the personalized program and the original complaint matter will simply be returned to the regular discipline process. Consequently, both the member and the Law Society will be in the same position they would have been in had the HRP never been attempted. The public interest will be served either by the member's successful completion of the program or by the application of the regular discipline process.

- **Public Interest:** The HRP process aligns with the Law Society's mandate, which emphasizes the need to protect the public. It is intended to support members with health concerns so that they will ultimately be able to practise law safely.

THE HEALTH RECOVERY PROGRAM continued...

Notable Highlights

Several lawyers have participated in the HRP since it began, and have undergone treatment for a variety of issues – from addiction, to anxiety, to other mental health disorders. What we commonly hear from those participating in the HRP is that treatment not only improved their professional situation, but also improved many aspects of their personal life and relationships. So far, the program's holistic and remedial objectives – to protect the public by providing health support to lawyers – appears to be working.

Our "on call" psychiatrist usually books an initial assessment for the lawyer within DAYS of our request. This is remarkable considering how long the waiting periods are to see most healthcare specialists. Any prescribed treatment program typically begins shortly after the assessment is complete.

To date, *Manitoba Health* has covered the cost of the assessments and treatment for our members – meaning that getting treatment through this process is not only timely, but is also typically free of charge.

> **If you are a member with health issues that are affecting your practice, or you know of a member who may be in need of support, the Law Society encourages you to explore The Health Recovery Program as one of the many resources available.**

Questions?

Any questions about *The Health Recovery Program* can be directed to:

Jamie Jurczak,
Director of Regulation

204-926-2060
jjurczak@lawsociety.mb.ca

Other Supports:

Free and confidential counselling services for lawyers, articling students and their families is available through Manitoba Blue Cross Employee Assistance & Wellness Solutions.

Contact Manitoba's Independent Peer Support Organization for Lawyers, Law(yer) Strong.

Exploring Mandatory Minimum Compensation (MMC) for Articling Students

Seeking Input from Principals and Potential Employers

The Law Society's Equity Committee is seeking input from the profession on a Mandatory Minimum Compensation (MMC) pilot project for articling students.

Why Introduce Minimum Compensation?
A 2025 review revealed that some articling students are uncompensated or paid minimally for their work, an issue that disproportionately affects internationally trained and racialized students.

We Want Your Perspective
Before launching this pilot, we want to understand the impact of MMC on the capacity of legal workplaces to hire articling students.

We are conducting targeted surveys for two groups:

- Principals
- Workplaces Without Principals

Your real-world perspective and insights will help us implement a balanced, sustainable pilot. Thank you for taking the time to share your feedback.

Take the 5 Minute Survey

Principals

Workplaces Without Principals

Your responses will be anonymous and confidential.
The surveys will remain open until September 21, 2026.

PRESIDENT'S RECEPTION

HOTEL FORT GARRY

BEFORE YOU DISCLOSE:
Confidentiality, Privilege and Public Safety Concerns

NOELIA BERNARDO, Practice, Ethics and Equity Advisor

Lawyers sometimes contact the Law Society because they are worried that a client or someone else may be at risk of serious harm.

A client may make alarming comments, send troubling messages, appear to be escalating, speak about harming themselves or another person, or share information suggesting that someone else may cause harm.

These are difficult situations. The lawyer may be trying to protect someone while also protecting the client's information. The immediate questions are often: must I disclose this, may I disclose it, or am I prohibited from doing so?

The answer may depend on what the lawyer knows, how the lawyer learned it, why it was communicated, and whether the information is confidential only or is also protected by solicitor-client privilege.

BEFORE YOU DISCLOSE continued...

Before disclosing client information, consider:

- What information am I proposing to disclose?
- Who provided the information?
- Why and in what context was it communicated?
- Is it confidential only, or is it also privileged?
- Is there client consent?
- Can the client take steps directly, where safe and appropriate?
- Can the concern be addressed without disclosing privileged information?
- Is there an identifiable person or group at risk?
- Is the danger imminent?
- Does the possible harm involve death or serious bodily harm?
- Is disclosure necessary to prevent the harm?
- Could disclosure create a risk of harm to me, my family or my associates?
- Is there another legal obligation that may apply?
- Who needs to receive the information?
- What is the least amount of information I need to disclose?

That last question is especially important.

Even where disclosure is justified, a lawyer should disclose only what is needed to address the risk. This may mean giving an appropriate authority or support service enough information to respond. It does not usually mean disclosing the client's full history, legal advice, strategy, unrelated admissions or other information from the file.

Confidentiality and Privilege are Not the Same

All privileged information is confidential, but not all confidential information is privileged.

A lawyer's duty of confidentiality is broad. It applies to information about a client or the client's matter that the lawyer learns through the lawyer-client relationship.

Solicitor-client privilege is narrower, but has stronger legal protection. It generally protects confidential communications between lawyer and client made for the purpose of seeking or giving legal advice. Privilege belongs to the client.

The *Code of Professional Conduct* may require or permit disclosure of confidential information. That does not necessarily mean that privileged information may be disclosed.

BEFORE YOU DISCLOSE continued...

The Source and Context of the Information Matter

In some public safety situations, the lawyer's concern may arise from information that is confidential but not privileged.

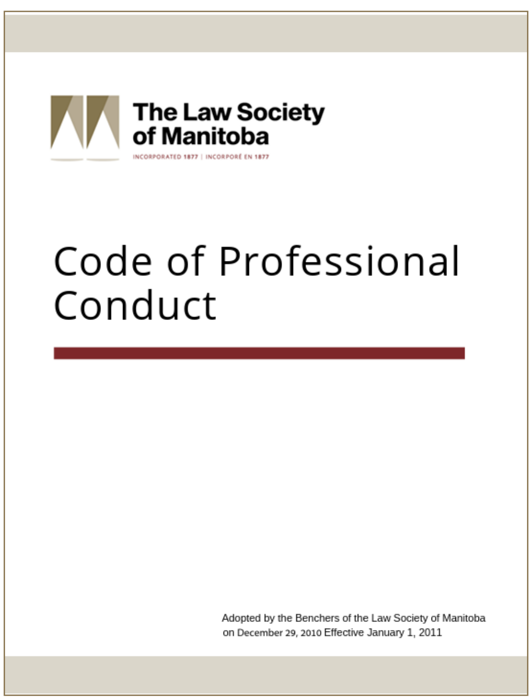
The concern may be based on the client's conduct or tone, an alarming message made outside the context of seeking legal advice, something the lawyer has personally observed, or information received from a family member or another person.

Where the information comes from the client, the lawyer should consider why and in what context it was communicated. A client's communication may be privileged even where it describes another person's conduct, such as where a client tells a lawyer that an elderly relative is being physically mistreated by a caregiver while seeking advice about protective or decision-making options.

The key question is not simply who provided the information or whose conduct it concerns. The lawyer should consider whether the communication was made confidentially for the purpose of seeking or receiving legal advice.

What Does the *Code* Say?

Rule 3.3 of the *Code* deals with confidentiality and identifies limited circumstances in which disclosure of confidential information is required or permitted.


The Law Society of Manitoba
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Code of Professional Conduct

Adopted by the Benchers of the Law Society of Manitoba on December 29, 2010 Effective January 1, 2011

For public safety concerns, rule 3.3-3A is particularly important. It requires a lawyer to disclose confidential information, but only to the extent necessary, where the lawyer:

- has reasonable grounds to believe that an identifiable person or group is in imminent danger of death or serious bodily harm; and
- believes disclosure is necessary to prevent the death or harm.

This is a high threshold. The risk must be serious and imminent, and the person or group at risk must be identifiable.

The mandatory obligation does not apply where the lawyer reasonably believes disclosure would cause harm to the lawyer, the lawyer's family or the lawyer's associates.

BEFORE YOU DISCLOSE continued...

What if the Information is Privileged?

If the information may be privileged, checking the *Code* is not enough.

The *Code* addresses the lawyer's professional duty of confidentiality. Solicitor-client privilege is a separate legal protection that belongs to the client.

In *Smith v. Jones*, the Supreme Court of Canada recognized a narrow public safety exception to solicitor-client privilege. It may permit disclosure where there is a clear, serious and imminent danger of death or serious bodily harm to an identifiable person or group.

The *Code* rule and the exception recognized in *Smith v. Jones* have similar thresholds, but they answer different questions:

- Rule 3.3-3A addresses when the *Code* requires disclosure of confidential information.
- *Smith v. Jones* addresses when privileged information may be disclosed despite the client's privilege.

For example, a client might leave a message saying they are on the way to a named person's workplace with a weapon and intend to harm them. If the message was not made as part of seeking legal advice, it may be confidential but not privileged.

If the same information is communicated while the client is seeking legal advice, privilege may be engaged. The lawyer must then consider both the *Code* and the public safety exception to privilege.

When in Doubt

Public safety concerns should not be ignored. At the same time, acting responsibly includes identifying the nature of the information, deciding whether the applicable threshold has been met, and limiting any disclosure to what is necessary.

Where circumstances permit, a lawyer who is unsure whether information is confidential, privileged or may be disclosed should pause and seek legal or ethical guidance before disclosing more than is required.

Questions? Looking for Guidance?

If you have questions about these issues or would like to discuss how they apply in a particular situation, please contact:

Noelia Bernardo,
Practice, Ethics and Equity Advisor

204-926-2019

practiceadvisor@lawsociety.mb.ca

"I'm always glad to talk through scenarios or provide guidance as you navigate your professional responsibilities." ~ Noelia

Law(yer) Strong

NEW PODCAST LAUNCHING

The legal profession comes with unique challenges, and conversations about mental health and well-being are essential.

Join **Law(yer) Strong,** a new podcast sharing stories, insights, and meaningful discussions focused on supporting the mental health and wellness of legal professionals, law students, and the wider legal community.

🎧 **Follow us on Spotify:**
Lawyer wellbeing Podcast
Law(yer)Strong

🗓️ **Mark Your Calendar: Special Upcoming Release:**

September 10 (World Suicide Prevention Day)
Episode: Living with Depression ~ *featuring Justin Foot and Glenn Schroeder*

Subscribe today so you don't miss this crucial conversation — Join the Movement!

Upcoming Events

September 17 – Retired Lawyers Coffee Circle (Meets Monthly ~ Third Thursday of each Month)
Time: 10:00 a.m. | Location: The Forks, 2nd Floor
Join us for an opportunity for retired lawyers to connect, engage in conversation, and build community over coffee.

September 18 – In Person Peer Support Volunteer Training
Time: 9:00 a.m. – 3:00 p.m.
Interested in becoming a Peer Support Volunteer? Contact us to register. CPD hours available.

Online Mentorship Hub: Join **6 monthly sessions** led by experienced mentors across 6 key practice areas:
⚖️ Civil Litigation | 🏛️ Criminal Law | 👨‍👩‍👧 Family Law | 📚 Legal Research & Articling
💼 Practice Management | 📜 Wills & Estates

Weekly Programs

Every Monday – Walk Club
Time: 12:00 p.m. | Location: The Forks
Join us every Monday to connect, get outside, and prioritize wellness.

Every Wednesday – Attorney Alliance
Time: 12:00 p.m.
A confidential 12-step group for past or present members of the Manitoba Bar.

Every Friday – Run Club
Time: 7:00 a.m.
Interested in joining Run Club? Email us for more information.

To register or learn more, contact admin@lawyerstrong-mb.ca

Health and Wellness Resource Library

Resources from the Law Society, Manitoba Blue Cross and other Partner Organizations

Digital Wellness Platform from Manitoba Blue Cross

www.wellness.mb.bluecross.ca

From one central location you can now access:

- Counselling support
- Relationship learning program
- Yoga and meditation program
- Sleep assessment
- Budgeting and financial self-directed courses
- And much more

For curated content, tips and resources to help YOU, start by taking a quick 10-minute wellness assessment.

Learn More

Practice Management Quick Tips

TANA CHRISTIANSON, Director - Insurance

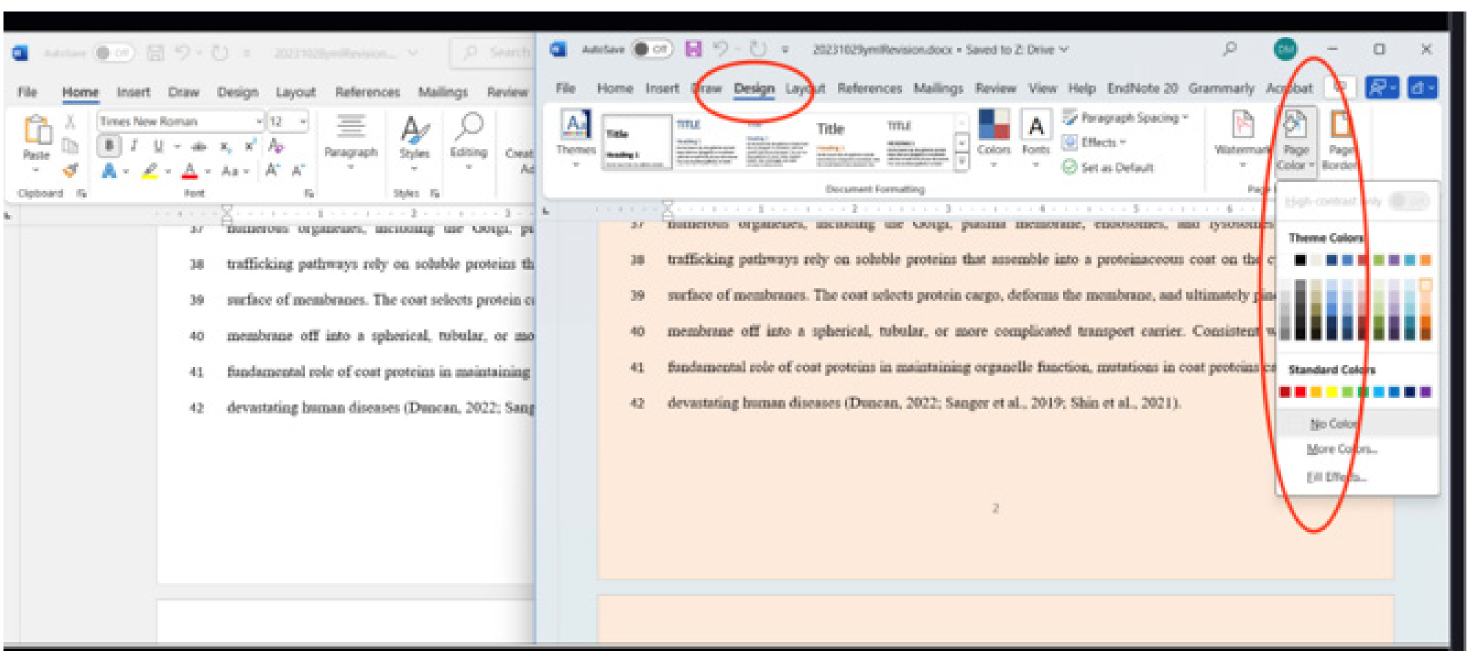
This isn't a Quick Tip; it is a vital reminder. Lawyers are easy and frequent targets for disappointed or vengeful clients. Just ask the Insurance Department and the Complaints Investigation Committee. Your best (only ?) defence to a complaint or a claim is a complete record of your communications with that client. If you want to sleep easily, document your conversations with clients **as soon as** you hang up the phone or they walk out the door. Now, not later. Set it aside and you will forget to do it.

Today that step has never been easier. Voice-to-text options are everywhere. Use your phone to dictate an email to yourself and save it to the client folder. MS Word has a voice-to-text feature. Use it to dictate a memo. Just know that in front of a Judge or a Hearing Panel, if it is just your word against a client's, you are going to lose. But a document made contemporaneously with the event will always trump someone's "memory" of what happened months earlier.

If you want to discuss voice-to-text options, call me.

****

If you have two versions of a document open for editing, change the background colour of the target document so you don't edit the wrong version by mistake.



PRACTICE MANAGEMENT QUICK TIPS continued...

AI can be a useful tool. However, what the hype over-looks is the potential for human error in its use. A common human error is failure to check the AI's product. A user gets careless because the last five times there has been no problem. As well, a user gets tired, rushed, or panicked so the "check it carefully" step is ignored. That said, I am impressed with the AI-assisted search tool implemented by CanLII. Because this feature can only search cases in CanLII's database, you are protected against AI hallucinations creating fake decisions and citation errors. It also provides instructions as to how to improve your search. If you haven't looked at it yet, take a look at CanLII Search +.

If you have two lists in Excel and need to know what they share or where they differ, it can be done even though Excel does not have a "compare these columns" button. Read on, McDuff: How to Compare Two Columns in Excel: Find Matches and Missing Values Fast.

If you are looking for free, confidential advice on how to make your practice more efficient and less aggravating, contact Barney directly at 204-857-7851 or by email at barney.christianson@gmail.com.

TRUST CONDITIONS AND UNDERTAKINGS – IN EVERY PRACTICE AREA!

SHARON KRAVETSKY, Practice Resource Coordinator | Continuing Professional Development

Trust conditions accepted and undertakings given (terms used interchangeably) are promises made by a lawyer which are intended to facilitate the progress of a matter without unnecessary delay. These elevated promises are given as an officer of the court, and as matters of the utmost good faith (uberrimae fidei) they will be stringently enforced.

Such promises should not be given without careful consideration.

The basic rule is straightforward:

A lawyer must not give an undertaking that cannot be fulfilled and must fulfill every undertaking given and honour every trust condition once accepted. (*Code of Professional Conduct Rule 7.2-11*)

What Does this Mean for Your Practice? [CM1.1]

Terms Must be Explicit

The trust condition or undertaking should be clear, concise, explicit and in writing.

There should be a deadline for compliance, failing which the item delivered subject to the trust conditions must be returned.

Accepting trust conditions or giving an undertaking in writing confirms the promise made. However, using property that is sent in trust evidences acceptance of the accompanying conditions.

Impose trust conditions when the trust property is sent. You cannot send property without condition and later try to add requirements for its use.

TRUST CONDITIONS AND UNDERTAKINGS continued...

Terms Are Professional and Personal Obligations

Be certain that you are fully and unqualifiedly capable of complying when you accept the trust condition or give your undertaking.

Do not accept trust conditions or make undertakings that depend on a third party doing something. You cannot promise to provide money you do not yet have or a document as yet unsigned. What if the bank does not advance funds or your client refuses to sign or dies?

A promise "on behalf of my client" can bind you personally. The client should make the promise, in writing, to the other party. One potential exception relates to undertakings made at an examination for discovery, where counsel's answer is deemed to be the answer of the client (KBR 31.08).

Undertakings made by an articling student or a legal assistant under your supervision are your personal obligation (*Code* Rule 6.1-3(c)).

Terms Must Be Reasonable

Be sure every condition you impose is reasonable. Never ask for a term you would not accept. Cooperative, reasonable and respectful conditions are the professional and effective way to achieve the objectives in most cases.

Once you accept a condition, you are personally bound to comply, even if the condition later seems unreasonable, and even if your client instructs you otherwise.

Trust conditions can actually change the agreement between the parties, by altering a term or adding a new term to what was agreed. Explain such changes to your client and seek their instructions where there is a potential risk.

Terms Can't Be Changed Unilaterally

You cannot insist on altering a condition and you cannot impose cross trust conditions. You may be able to negotiate an amendment or a time extension. If a change is agreed, confirm in writing. If you cannot accept the trust conditions, return the item as required.

Special Terms for Real Estate Conveyancing

The Standard Conveyancing Practice ("SCP") trust conditions have been developed for use with the current statutory offer to purchase forms for single family residential houses and condominium units, and reflect best practice standards.

TRUST CONDITIONS AND UNDERTAKINGS continued...

Dealing With Non-Compliance

In the event of non-compliance, consider if it is appropriate to contact the other lawyer to see if any difficulties can be resolved. Other possibilities might include:

- a demand letter with a final deadline
- a complaint to the Law Society or an insurance claim for breach of trust
- a court application for contempt
- an action for damages if there is no other remedy

If a breach of trust condition causes damage, both the defaulting lawyer and the lawyer who imposed the condition may be liable for the loss.

Do not attempt to repair the situation independently. Lawyers are required to give prompt notice to the Law Society Insurance Department of any circumstances which might give rise to a claim, including the failure or inability to comply with a trust condition.

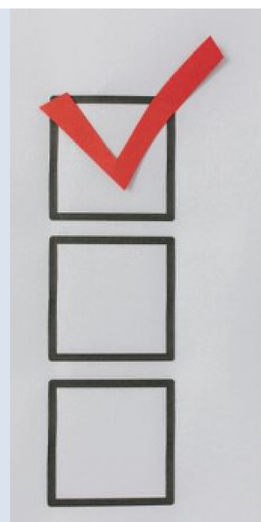
The immediate reporting of the matter can be critical to the insurer's ability to repair the situation or minimize the loss. Late reporting of a claim can result in a denial of coverage. By immediately referring the matter to the Insurance Department, you can cooperate with the possible repair, while ensuring that the client's interests are protected.

Reporting a potential claim does not preclude a claim being filed about the breach. Civil liability for negligence (which might be dealt with by insurance) and discipline are both possible.

Conclusion

When imposing or accepting trust conditions and undertakings[CM2.1]:

1. Be sure the terms are reasonable, clear and explicit and have a temporal limit.
2. Complying with these promises is your professional responsibility. Ensure that you can personally comply with every promise.
3. Do not accept a trust condition or make an undertaking if your compliance depends on the action of a third party.



Consequences for a breach of a condition or undertaking include potential prejudice to a client, damage to your reputation and professional discipline. Depending upon the circumstances, exposure to civil liability is also a risk. For more details, see Trust Conditions and Undertakings.

CPLED IS LOOKING FOR:
Internationally Educated Lawyers

JOAN HOLMSTROM, Director - Competence

CPLED is seeking members for its Internationally Educated Lawyers (IEL) Advisory Group and welcomes applications from internationally educated lawyers with relevant experience or expertise.

The IEL Advisory Group will provide informed advice and recommendations to help improve the experiences and outcomes of internationally educated lawyers participating in CPLED programs and pursuing Canadian legal licensing. Members will help identify barriers to entry and success, recommend strategies and supports to improve engagement and outcomes, advise on culturally responsive and inclusive practices, and contribute to discussions on communication, outreach, and collaboration across jurisdictions and interest holders.

The IEL Advisory Group will meet virtually approximately four times per year, with members appointed to a two-year term.

Interested in serving on the IEL Advisory Group?
Learn more about the role and complete the application form by September 15, 2026.

CPLED IS HIRING: *Contractors to Assist with Indigenous Peoples and the Law Module*

JOAN HOLMSTROM, Director - Competence

CPLED is seeking one or more advisors to support the ongoing review and development of the Indigenous Peoples and the Law (IPL) module, delivered nationally to National Committee on Accreditation (NCA) candidates, and Indigenous-content learning materials within the Practice Readiness Education Program (PREP).

CPLED welcomes expressions of interest from lawyers, legal educators, Indigenous legal scholars, and others with experience teaching, developing, or advising on legal education related to Indigenous Peoples in Canada, including Indigenous cultures, histories, contemporary legal issues, and the relationship between Indigenous Peoples and the Canadian legal system.

Working with CPLED staff and contractors, the advisor(s) will provide recommendations on course and program content, review feedback and emerging developments, and help ensure learning materials remain historically accurate, relevant, respectful, and responsive to the evolving legal and professional context in which future lawyers practise. This work supports CPLED's commitment to helping candidates develop a deeper understanding of Indigenous legal issues and engage with them in a thoughtful, informed, and professionally responsible manner.

Compensation will be provided on a contract basis. Individuals interested in learning more or expressing interest are encouraged to contact Karmen Masson, Director, Strategic Initiatives and Interest Holder Engagement, at karmen.masson@cpled.ca.

RECRUITMENT OF SUMMER STUDENTS

JOAN HOLMSTROM, Director - Competence

Did you know that there are formal processes for hiring a law student for a summer position?

If you wish to hire a student for next summer who will be between second and third year during that summer, the **2L Summer Recruit** takes place this fall. If you do not wish to participate in this recruitment process, you ought to wait until the formal 2L recruitment process is over before embarking on your recruitment of a 2L student for the summer of 2027.

The 2L Summer Recruitment Guidelines are posted on the LSM website here:

Summary:

Job posting to be sent to both: Faculty of Law to: lisa.griffin@umanitoba.ca and Law Society to: articling@lawsociety.mb.ca	Friday, September 4, 2026
Application deadline for students	Tuesday, September 29, 2026 at 12pm CDT
Interview call date	Thursday, October 15, 2026, between 12-2pm CDT
Interviews	Monday, October 19 to Friday, October 23, 2026
Earliest offer date	Tuesday, October 27, 2026, between 12-2pm CDT

Recruitment of students who will be between 1st and 2nd year law (the **1L Recruit**) will take place in early 2027 and the guidelines for that recruitment will be posted in advance of that time. Again, it is expected that if you intend to hire a student from 1st year law to work in the summer of 2027, you will follow the recruitment process outlined in the guidelines.

It is in the interests of the students that these guidelines are followed as they provide defined periods for job searches and interviews, allowing students to best accommodate both a job search and their studies.

Employers are reminded that any law students working with them are required to register with the Law Society by completing and submitting the following form.

PREP IMPORTANT DATES

	June 2026 Intake (Standard PREP)
Participate in six online synchronous workshops	June 22, 2026 to September 4, 2026
DEADLINE TO PAY 3rd Tuition Instalment	**August 28, 2026**
PHASE THREE: Complete assisnments Virtual Law Firm	September 8, 2026 to January 22, 2027
DEADLINE TO PAY Final Tuition Instalment	**January 13, 2027**
Complete Capstone Evaluations	January 25, 2027 to February 5, 2027

PLEASE NOTE:

For those in Standard PREP or with Students in Standard PREP, please note the Capstone Evaluation Period in your diaries now and adjust any personnel duties as may be required for that period. **Workplaces should not have their articling students providing any services to the firm or its clients during the Capstone Evaluation Period**. Articling Students must be able to devote their entire focus to preparing for and completing the Capstone Assessments during the Capstone Evaluation Period.

PREP FUTURE INTAKES:

	Registration Opens	Registration Closes	Program Start Date
February Accelerated PREP	January 11, 2027	January 29, 2027	February 12, 2027
June Accelerated PREP	May 3, 2027	May 21, 2027	June 7, 2027
Standard PREP	May 3, 2027	June 4, 2027	June 21, 2027
September Accelerated PREP	August 9, 2027	August 27, 2027	September 13, 2027

FALL ACCELERATED PROGRAM

There is also a Fall Accelerated Program, whose schedule can be found here.

As with the Summer Accelerated PREP, those participating in Accelerated are not to be working while the Accelerated Course is taking place as it is considered to be equivalent to working and requires a student's full attention.

QUESTIONS? Contact Joan Holmstrom at 204-926-2017 or at jholmstrom@lawsociety.mb.ca.

Western Canada Competency Profile Renamed

Thank you to everyone who provided feedback on the Western Canada Competency Profile (WCCP) implementation. Your input on potential changes to the bar admission process is valuable as the participating provinces continue to assess the proposed approach. The results of the survey are currently being analyzed and an aggregate report will be shared with the profession when ready.

A reminder that no decisions have been made about whether to proceed with the proposed WCCP implementation approach. Recommendations to each respective law society on next steps will be informed by the feedback received through this survey, considerations around the Canadian Centre for Professional Legal Education operations and the overall regulatory environment in each jurisdiction.

New Name

In the interim, there is an important update to the WCCP that lawyers and students should be aware of.

As the Nova Scotia Barristers' Society has joined this initiative, **the WCCP has been renamed to Competencies for Entry to Legal Practice (CELP)** to include all participating provinces.

View the latest version of the CELP on our website.

Manitoba Law Reform Commission

NOTICES

1 On July 31, 2026, the Manitoba Law Reform Commission released its Report #147 titled "Administrative Law in Manitoba: A Proposed Statute for Judicial Review".

In this report, the Commission proposes a statute that addresses the process of judicial review of administrative decisions in Manitoba. This statute builds on best practices and the status quo regarding judicial review in Canada. It seeks to build on practices from the Federal Courts, Ontario, and British Columbia.

The report is meant to prompt discussion about the benefits of codification in this area of the law, through addressing 12 questions, in turn giving rise to the statutory provisions.

2 On August 11, 2026, the Manitoba Law Reform Commission released its Report #146 titled "Assisted Decision-Making Agreements".

In this report, the Commission examined the current state of the law on assisted decision-making in Manitoba and other jurisdictions. Upon review of the law and consideration of feedback and commentary received, the Commission does not, at this time, recommend significant legislative reform to formalize assisted decision-making agreements. However, there may be some benefit in developing a non-legislative template or guidance document, grounded in the existing recognition of assisted decision-making in section 6 of The Adults Living with an Intellectual Disability Act, that could be used consistently across a range of circumstances.

The full reports are available on the Commission's website here: www.manitobalawreform.ca.

John Burchill, Executive Director

Manitoba Law Reform Commission
University of Manitoba, Faculty of Law
Winnipeg MB, R3T 2N2

Email: lawreform@gov.mb.ca **Office: (204) 945-2896**
Web: www.manitobalawreform.ca

MEMBERSHIP CHANGES

New Admissions:

June 8, 2026	Adam M. Kowal
June 12, 2026	Oluyinka Sarah Idowu
June 12, 2026	Lyric D. Stewart
June 15, 2026	O. Michael Akhigbe
June 22, 2026	Brianna Patrick
June 25, 2026	Stefan O.H. Kriening
July 1, 2026	Baljinder (Aman) Kaur
July 2, 2026	Nikhil Khullar
July 2, 2026	Derek J. Nepinak
July 2, 2026	Gregory D.L. Fingas
July 2, 2026	Christopher H. McDougall
July 3, 2026	Iris M. Fairley-Beam
July 6, 2026	Willow J. Froese
July 6, 2026	Isha Khandelwal
July 6, 2026	Zachary R. Burdz
July 6, 2026	Jesse R.W. Windsor
July 6, 2026	Helena N. Zarychta
July 6, 2026	Denise A.G. Sarmiento
July 6, 2026	Matthew D. Bell
July 6, 2026	Abiodun A. Ajari
July 6, 2026	Steven R.A. Csincsa
July 6, 2026	Elise R. Alder
July 6, 2026	Touseef Abbas
July 6, 2026	Samantha L. Pearce
July 6, 2026	Harlan D. Morris
July 6, 2026	Micayla B. McNaughtan
July 6, 2026	Meridith J. Harley
July 6, 2026	RhiZhi (Klose) Chen
July 6, 2026	Maryam Khalid
July 7, 2026	Jason V. Erbeznik
July 7, 2026	Chika U. Okoroafor
July 16, 2026	Taylor B. Neustaeter
July 21, 2026	Tolani R. Adeyekun

Non-Practising to Practising:

June 29, 2026	Sarah S. Murdoch
July 2, 2026	Deborah S. Kolt
July 6, 2026	Rebecca S. Bae
July 6, 2026	Fatima Peyawary
July 15, 2026	Emmanuella Obeya
July 19, 2026	Alexander C.H. Bastin
July 20, 2026	Brittany K. Rankine
July 20, 2026	Lauren M. Hodgins
July 27, 2026	Muskan Kumar
Aug. 4, 2026	Carlyn L. Sarna

Member Forms Available Here

MEMBERSHIP CHANGES continued...

Practising to Non-Practising:

June 9, 2026	Renee D. Wickler
June 9, 2026	Shah Rukh Z. Abbas
June 10, 2026	Emily C. Guglielmin
June 13, 2026	Shahzad Musaddiq
June 16, 2026	Nicholas L. Mark
June 19, 2026	Terry P. Beley
June 24, 2026	K. Rhodel Ferriss
June 26, 2026	Michael J. Williams
June 27, 2026	Amanda S.M. Hince Siwicki
June 27, 2026	Larry M. Hodgson
June 29, 2026	Brigitte A.M. Dupuis
June 30, 2026	Marcel D. Jodoin
June 30, 2026	Murray W. Froese
June 30, 2026	Andrea C. Dodgson
June 30, 2026	Allan P. Fineblit, KC
June 30, 2026	Robert L. Tapper, KC
June 30, 2026	Katherine E. Loewen
June 30, 2026	Emma S. Poyser
July 1, 2026	Natalie A.M. Copps
July 1, 2026	Samantha B. Guney
July 2, 2026	Chelsey E. Morgado
July 6, 2026	Lauren C. Milne
July 7, 2026	John W. Barber
July 9, 2026	Gisele R. Champagne
July 18, 2026	Stephen A. Porco
July 18, 2026	Season C. Roulette
July 20, 2026	Emmanuella Obeya
July 21, 2026	Leigh-Anne Mercier
July 21, 2026	Kelsey M. Brooks
July 31, 2026	Yousap Hanna
Aug. 1, 2026	Sonali Garg
Aug. 1, 2026	Erin M. Harley
Aug. 4, 2026	Lou R. Lamari

IN MEMORIAM

Richard Lewis Cassidy, who passed away on May 16, 2026 at the age of 80. Mr. Cassidy received his call to the Bar on June 25, 1976. He practised for 47 years as a partner with the firm known today as Cassidy Ramsay, retiring in 2023.

Robert Douglas Tonn, who passed away on May 21, 2026 at the age of 77. Mr. Tonn received his call to the Bar on June 24, 1982. He practised as a partner with the firm known today as Myers LLP for 20 years and then as a sole practitioner for nine years. Mr. Tonn retired from practice in 2011.

Michael John Watson, KC, who passed away on May 24, 2026 at the age of 74. Mr. Watson received his call to the Bar on June 29, 1978. He practised with Troniak & Co. for two years before relocating to Alberta where he served as Crown counsel for ten years. In 1991 Mr. Watson returned to Manitoba, serving as Director of Prosecutions with the Department of Justice in Brandon. In 1997 he joined the British Columbia Securities Commission and later joined the Ontario Securities Commission serving as Director of Enforcement. Mr. Watson was appointed King's Counsel in 1994.

Alvin Murray Zivot, KC, who passed away on May 28, 2026 at the age of 94. Mr. Zivot received his call to the Bar on April 1, 1959. He practised as a partner with the firm known more recently as Baker Zivot & Co. for 33 years and then joined the Residential Tenancies Commission where he served as Chief Commissioner for 11 years. Mr. Zivot retired from practice in 2003. He was appointed King's Counsel in 1978.

Sidney Green, KC, who passed away on June 7, 2026 at the age of 96. Mr. Green received his call to the Bar on September 30, 1955. He practised as a partner with Mitchell Green Minuk for 13 years and then as a sole practitioner for 48 years, retiring in 2017. Mr. Green served as a Member of the Legislative Assembly from 1966 to 1981 and was appointed King's Counsel in 1969. After serving eight years as a bencher, Mr. Green was appointed a life bencher in 2004.

NOTICE OF BENCHERS' MEETING

The next regular meeting of the benchers of the Law Society of Manitoba will be held on:

Thursday, September 10, 2026 | Elkhorn Resort, Clear Lake | **1:00 p.m.**

Members of the Law Society are encouraged to attend and participate in the deliberations of the governing body.

Dates for the next meetings are as follows:

- October 29, 2026
- December 10, 2026
- February 4, 2027
- March 18, 2027
- May 13, 2027
- June 17, 2027

If you wish to attend a meeting via videoconference, contact Pat Bourbonnais at pbourbonnais@lawsociety.mb.ca.

Agenda and meeting minutes are published on the website here.

Do You Pay Your Practising Fees by Instalment?

Next Payment is Due:

September 1, 2026

On July 31st, all lawyers who paid their practising fees by instalment received a reminder email about the upcoming payment which is due on or before **Tuesday, September 1, 2026**.

Check your email!
Your invoice is in the Member Portal.

PAYMENT METHODS

Don't Delay! Avoid late fees!

The Law Society of Manitoba

INCORPORATED 1877 | INCORPORÉ EN 1877

NOTICE OF ADMINISTRATIVE SUSPENSION

Jeffrey Ralph Wallace Rath

TAKE NOTICE that pursuant to Law Society Rule 2-88, **JEFFREY RALPH WALLACE RATH** is administratively suspended from practising law for failure to remit payment for his Professional Liability Claims Fund contribution.

August 6, 2026

Leah Kosokowsky
Chief Executive Officer

Issued: August 6, 2026

Programs

Western Bar CPD

September 11 | In-person	Register

Central Bar CPD

September 25 | In-person	Register

National Day for Truth and Reconciliation Event

September 25 | Hybrid	Save the Date

Practising Law at the Speed of Light

October 8 | Webinar	Register

So You Want to Be a Labour Arbitrator

October 13 | In-person	Register

Access to Justice Week Event

October 27 | Webinar	Save the Date

Education Centre

Explore the latest programs, courses, and resources

Programs

CPD on Demand

Practice Resources

Upcoming IMPORTANT DATES At a Glance

SEPTEMBER 10
BENCHER MEETING
Elkhorn Resort, Clear Lake
1:00 p.m.

SEPTEMBER 11 and 12
WESTERN BAR and AGM WEEKEND

SEPTEMBER 25
CENTRAL BAR CPD
Lunch and Golf

UPCOMING PRACTISING FEE PAYMENTS DUE

SEPTEMBER 1
2026-2027 Practising Fees - 2nd Instalment

for lawyers paying by the instalment plan

OCTOBER 1
2026-2027 Practising Fees and Insurance - 2nd Instalment

for lawyers called to the Bar on June 19, 2026

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Sharyne Hamm

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