The Law Society of Alberta
Hearing Committee Report

In the matter of the *Legal Profession Act,*
and in the matter of a hearing regarding
the conduct of Kristine Robidoux, QC,
a Member of the Law Society of Alberta

A. Jurisdiction and Preliminary Matters

1. A Hearing Committee of the Law Society of Alberta ("LSA") held a hearing into the conduct of Kristine Robidoux, QC on May 26, 2014. The Committee consisted of Douglas R. Mah, QC (Chair), Brett Code, QC (Committee Member) and Amal Umar (Committee Member). The LSA was represented by Norman K. Machida, QC. Ms. Robidoux was present and was represented by Peter T. Linder, QC.

2. There was no objection by either counsel regarding the composition of the Committee.

3. Exhibits 1 through 4, consisting respectively of the Letter of Appointment of the Hearing Committee, the Notice to Solicitor with Acknowledgement of Service, the Notice to Attend with Acknowledgement of Service and the Certificate of Status of the Member, established the jurisdiction of the Committee and were admitted into evidence by consent.

4. The Certificate of Exercise of Discretion was entered as Exhibit 5. No request for a private hearing was received and, accordingly, the hearing proceeded in public. Members of the public were present during the hearing, including the Complainant, the Candidate, and at least one representative of the media.

5. An Exhibit Binder containing Exhibits 1 through 61 was provided to the Committee Members and the contents admitted into evidence by consent. The following additional exhibits were also entered into evidence by consent:

   Exhibit 62: Agreed Statement of Facts and Admission of Fact and Guilt;

Exhibit 63: Certificate dated May 22, 2014 issued by the LSA certifying that Ms. Robidoux has no LSA discipline record as at the date of the letter;

Exhibit 64: Joint Submission on Sanction, signed by both counsel; and

Exhibit 65: Copy of letter of apology prepared by Kristine Robidoux and addressed to the Candidate dated May 26, 2014.

B. Citations

6. As indicated in the Notice to Solicitor (Exhibit 2), the Hearing Committee inquires into the following citations:

1. It is alleged that Kristine Robidoux disclosed confidential information, and that such conduct is conduct deserving of sanction.
2. It is alleged that Kristine Robidoux demonstrated a lack of candour in her dealings regarding the Complainant, the Candidate, and that such conduct is conduct deserving of sanction.

C. Agreed Statement of Facts and Admission of Fact and Guilt

7. The hearing was originally scheduled to take place over five days. During the previous week, counsel advised that the hearing would be truncated to one day because the parties would tender an Agreed Statement of Facts, thus dispensing with the need to call evidence.

8. The Agreed Statement of Facts contains, as its last page, an Admission of Fact and Guilt signed by Ms. Robidoux. The Agreed Statement of Facts and Admission of Facts and Guilt are attached to this report as the Appendix. The content of this Appendix constitutes the facts upon which the Hearing Committee has rendered its decision. The Appendix should be read as part of this Report.

D. Decision as to Citations

9. After deliberation, the Hearing Committee unanimously decided to accept the Agreed Statement of Facts and the Admission of Fact and Guilt as presented.

10. An allegation of breach of confidentiality forms the substance of Citation 1. The Agreed Statement of Facts clearly indicates that Ms. Robidoux disclosed information to M. about issues within the Candidate's campaign. Although there is some question about the scope of Ms. Robidoux's retainer, LSA counsel advised and counsel for Ms. Robidoux took no exception to the assertion that the scope of the retainer is immaterial. There is no issue that Ms. Robidoux was acting as legal counsel for the campaign team, which included the Candidate.

11. While Ms. Robidoux indicates that she had other capacities, certainly one of her roles was legal counsel. At paragraphs 14 and 15 of the Agreed Statement of Facts, Ms. Robidoux admits that she was viewed by members of the campaign team, including the Candidate, as their counsel. Accordingly, based on the admissions in the Agreed Statement of Facts, the Hearing Committee has no difficulty in accepting that she improperly disclosed confidential client information to M. in her capacity as legal counsel.

12. With respect to Citation 2, the Hearing Committee accepts that once the Article was published, Ms. Robidoux failed to tell the Candidate or indeed anyone on the campaign team that she was the anonymous source who supplied information to M.

13. In addition to the breach of confidentiality, there was also an element of cover-up. As the person who committed the breach, it was incumbent upon Ms. Robidoux as a professional to admit to her transgression. Instead of doing so, she attempted to rely on journalist-source privilege as a shield or at least M.'s promise not to reveal her identity. Indeed, it was not until more than a year later when M. was being questioned as part of a legal action that the Candidate had commenced that the Candidate finally learned that Ms. Robidoux was the leak in the campaign organization (see paragraph 33 of the Agreed Statement of Facts).

14. Implicit in the Hearing Committee's acceptance of the Admission of Guilt on this citation is that Ms. Robidoux failed to be candid in her dealings with other members of the campaign team, including T.

15. It is noted parenthetically that M. did not attempt to invoke journalist-source privilege during his July 2008 questioning (see Exhibit 58, page 5, paragraph 22 and Exhibit 59, page 4, paragraph 16). Having learned this information through the discovery process, it was not until April 29, 2011 that the Candidate received authorization from the court – in the form of relief from the implied undertaking rule – to file the complaint with the LSA (see Exhibit 58 – Memorandum of Decision dated April 29, 2011).

E. Decision Regarding Sanction

16. Following considerable discussion, the Hearing Committee also unanimously agreed to accept the joint submission of counsel regarding sanction (Exhibit 64).

17. In doing so, the Hearing Committee was faced with two limitations. First, counsel did not refer us to any precise authority regarding the sanction in cases of breach of client confidentiality. However, LSA counsel did assure us that the proposed sanction of a four month suspension is within the acceptable range of sanctions for transgressions of this type, an assertion to which counsel for Ms. Robidoux took no objection. Second, the Hearing Committee can only decide sanction on the basis of the admitted facts. There may well be other facts that we have not heard that would affect sanction; however, we only have the benefit of what counsel agreed upon.

18. At first, the suspension of four months seemed to the Hearing Committee to be at the harsher end of the scale in terms of penalty. The Hearing Committee does acknowledge – and appreciate – the rather extensive Agreed Statement of Facts to which Ms. Robidoux has stipulated. It takes the form of a first person narrative and is cast in a factually frank and forthright manner. The tendering of this Statement of Facts and the Admission of Guilt resulted in much shortened proceedings. It has saved several

witnesses from the inconvenience of having to testify and has saved the LSA from expending considerable resources.

19. The Hearing Committee also considered Ms. Robidoux's admission of wrongdoing as a positive act. Ms. Robidoux acknowledges that she has breached the rules of professional conduct and that persons, particularly the Candidate, have been wronged. Also going in her favour is the fact that today she submitted an apology to the Candidate, which is indicative of taking responsibility. Finally, coming into this hearing, Ms. Robidoux had an unblemished discipline record.

20. However, the Hearing Committee ultimately agreed that the circumstances of this case warrant a sanction at the harsher end of the spectrum. This is primarily for two reasons.

21. This Hearing Committee agrees with the precept expressed in *Law Society of Alberta v. Paidra*, 2013 ABLS 18, where it is stated:

> 24. A Hearing Committee should give serious consideration to a joint submission on sanction, should not lightly disregard it, and should accept it unless it is unfit or unreasonable, contrary to the public interest, or there are cogent reasons for rejecting it. There is no single correct sanction and the Hearing Committee considers whether the proposed sanction falls into the range of what is reasonable.

22. Further, at paragraph 27, it is stated:

> 27. Requiring too much detail about a negotiated solution is both unnecessary and undesirable.

23. In the instant case, the Hearing Committee accepts counsel's submission that the proposed sanction falls into the range of what is reasonable and can find no reason to reject it.

24. The second reason for accepting the joint submission as to sanction relates to the nature of the offence itself. This is a case where the facts and circumstances warrant a sanction in the high end of the range.

25. It is an unfortunate day for the legal profession in Alberta when a prominent lawyer essentially disgraces herself and her profession, as was the case here. While supposedly acting as legal counsel for the campaign team, whose stated purpose was to get the Candidate elected as the MLA for a Calgary riding, instead Ms. Robidoux was acting as a sort of "fifth columnist" (to use the words of one of our Committee Members) by feeding information to M.

26. The duty of confidentiality is fundamental to the lawyer-client relationship, so much so that it gives rise to a legal privilege. It is impossible to maintain the relationship of lawyer and client without confidentiality. If lawyers do not maintain client confidentiality, the public's trust in our profession will soon become eroded and irreparably harmed.

27. The *Code of Professional Conduct*, as it read at the time, contained this statement of principle:

> A lawyer has a duty to keep confidential all information concerning a client's business, interests and affairs acquired in the course of the professional relationship.

28. In the commentary, the following statement is made:

> The maintenance of confidentiality is central to the credibility of the profession and the trust that must be reposed in a legal advisor.

29. To illustrate, by way of example, the seriousness of the conduct, paragraphs 18 and 19 of the Agreed Statement of Facts state:

> 18. T. responded with an email to the Candidate complaining about the Candidate's unilateral decisions and not following the advice of his

campaign team. This February 7th, 2008 email ("February 7th email") was forwarded to me and B.S. with the following preface:

> "FYI. This email is STRICTLY between the three of us until I call for help. I am doing due diligence informing you of a possible pending issue. I do not take lightly legal action against me as I am merely a volunteer"
>
> **(EXHIBIT 34)**

19. I immediately forwarded the February 7th email to M. who was a journalist and a friend and who I understood was writing a negative article about the Candidate and his campaign and about Premier Stelmach's inability to control the Candidate as a candidate.

30. The February 7th email contained sensitive information about the Candidate's campaign, known only to campaign insiders, and which could reflect negatively on the Candidate. In stressing the confidential nature of this communication, T. typed the word "strictly" in all capitals. Despite this, Ms. Robidoux admits that she "immediately" forwarded the information to M., columnist for a newspaper.

31. To the Hearing Committee, it is nearly beyond comprehension why the email exchange between Ms. Robidoux and M. took place. It is hard to conceive of a more blatant example of a deliberate breach of confidentiality by a lawyer and we are left to guess as to what may have motivated such actions.

32. The Hearing Committee noted that Ms. Robidoux is a Queen's Counsel. In the mind of the public, the Queen's Counsel designation is a badge of honour. One would expect a Queen's Counsel to hold himself or herself to a higher standard. The public is left to wonder, what does it mean to be a Queen's Counsel when fundamental principles of integrity, such as client confidentiality, are so easily discarded.

33. A suspension of four months duration is no small thing. It creates upheaval for both the firm and the clients. There was news media present at the hearing. This case will attract considerable public attention and Ms. Robidoux will incur significant loss of reputation as a result. She will not have the benefit of practical obscurity, as in other LSA disciplinary cases. It will require significant time and effort on Ms. Robidoux's part to repair the damage to her reputation.

34. It is the Hearing Committee's sincere hope that Ms. Robidoux reflect on the consequences of her actions and do whatever is necessary to restore her tarnished standing.

35. It is the order of this Hearing Committee that:

1. Pursuant to section 72(1) of the *Legal Profession Act*, RSA 2000, c. L-8; Ms. Robidoux's membership with the Law Society shall be suspended for a period of 4 months commencing on May 26, 2014;
2. Pursuant to section 72(2) of the *Legal Profession Act*, RSA 2000, c. L-8; Ms. Robidoux shall pay the investigation and hearing costs to the Law Society of Alberta prior to her application for reinstatement.

F. Concluding Matters

36. The Hearing Committee also makes an order directing the Executive Director to publish a notice of the outcome of this hearing under Rule 107 of the *Rules of the Law Society of Alberta*.

37. The exhibits and this report will be available for public inspection, including the provision of copies of exhibits for a reasonable copy fee, except that the identities and other identifying information about persons other than Ms. Robidoux and the Candidate will be redacted [Rule 98(3)].

Dated this 9th day of June, 2014

Douglas R. Mah, QC – Committee Chair

Brett Code, QC – Committee Member

Amal Umar – Committee Member

Appendix: Agreed Statement of Facts

Appendix

IN THE MATTER OF THE *LEGAL PROFESSIONS ACT*

AND

IN THE MATTER OF THE HEARING REGARDING THE CONDUCT OF KRISTINE ROBIDOUX QC, A MEMBER OF THE LAW SOCIETY OF ALBERTA

AGREED STATEMENT OF FACTS

INTRODUCTION

1. I was admitted to the Law Society of Alberta on July 30, 1992.

2. My status with the Law Society of Alberta is active/practising and that was the state of my status in 2007 and 2008.

3. Prior to my joining Gowling LaFleur Henderson LLP in 2008, as a member of the Business Law department practicing in the area of corporate risk and regulatory compliance, I was the owner and president of a home based consulting business known as C.W. assisting clients in designing compliance programs on business ethics, privacy and regulatory governance.

CITATIONS

4. On February 19, 2013, the Conduct Committee Panel referred the following conduct to a hearing:

    1. IT IS ALLEGED THAT you disclosed confidential information, and that such conduct is conduct deserving of sanction.

    2. IT IS ALLEGED THAT you demonstrated a lack of candor in your dealings regarding the Complainant, the Candidate, and that such conduct is conduct deserving of sanction.

FACTS

Background

5. The Complainant, the Candidate, is a prominent international journalist and was the candidate for the Progressive Conservative Party of Alberta (PC) in a riding, in the March 3, 2008, Provincial General Election.

6. During the PC nomination contest for the riding, I was the Vice President of Policy and a board member of the riding. Upon learning that the Candidate was seeking the nomination, I volunteered and sought to assist the Candidate in winning the nomination.

   (**Exhibit 7, 8, 11, 12, 15)**

7. I agreed to act as the Candidate's official agent under the *Elections Act* RSA 2000 c. E-1. I reviewed the nomination rules and assisted and supported the Candidate's bid to win the nomination as the PC candidate.

   (**Exhibit 9, 10, 12, 14, 18)**

8. On November 17, 2007, the Candidate won the nomination as the PC Candidate in the 2008 Provincial General Election.

9. Under the constitution of the Provincial Progressive Conservative Association, the Candidate was responsible to appoint and direct his campaign team.

   (Exhibit 20)

10. The Candidate's Campaign Team ("Campaign Team") consisted of:

    The Candidate
    Campaign Manager – T.
    Legal Counsel – The Member, K.R.
    Chief Financial Officer – S.D.
    Campaign Coordinator – M.S.

    and other volunteers as set out in the organizational chart (**Exhibit 31**)

11. In connection with the 2008 Provincial General Election, I was appointed as the quadrant chair for 5 different electoral constituencies in the city of Calgary. In addition, apart from my duties and responsibilities as the official agent for the Candidate under the *Elections Act*, I agreed to be legal counsel for the Campaign Team which required me to be a resident and be registered to practice law in Alberta. I understood that my job description as legal counsel was to ensure that the campaign conformed to the requirements of the *Election Act*. My responsibilities included being available to provide legal counsel to the

Candidate, T., the Campaign Manager, S.D., the Chief Financial Officer, and liaise with other legal counsel appointed in other ridings.

(Exhibit 19, 21)

12. The complaint by the Candidate involves the secret disclosure of confidential information through telephone calls and emails to M., a journalist who wrote an article published on February 13, 2008 (the "Article") by the media. The Article was unbalanced and wholly negative, thereby leaving a misleading and false impression about the Candidate and the campaign. The Candidate lost the March 3, 2008 Provincial Election and in July of 2008 commenced a Court of Queen's Action xxxx-xxxxx (the "Action") seeking damages for defamation arising from the Article. **(Exhibit 56, 57, 61)**

13. During the pre-trial discoveries in the Action, M. disclosed that I was a source of certain information in the Article. Subsequently, the Complainant unsuccessfully sought to sue me with the information obtained through the pre-trial process in the Action. However, the Candidate was successful in amending the Action and added me as a Defendant in the Action as well as obtaining relief from the implied undertaking rule to allow the Candidate to use discovery evidence in support of his complaint with the Law Society of Alberta against me (**Exhibit 58, 59)**

DISCLOSURE OF CONFIDENTIAL INFORMATION

14. After accepting my triple roles as PC quadrant chair and the official agent for the Candidate and legal counsel for the Campaign Team, I did not inform anyone that my role and duties as legal counsel was of a limited retainer or that it could conflict with any of my duties as quadrant chair for the PC party that required me to report on activities of four other PC candidates and their campaigns to B.S.

15. I did not at any time inform or disclose to anyone that I would be unable to provide legal advice and counsel to the Campaign Team including the candidate during the election campaign. I was required to be available to provide legal counsel and advice to the Campaign Team including the candidate during the election campaign (**Exhibit 22, 23, 29, 48, 49, 50)**

16. I was the only lawyer and legal counsel for the Campaign Team and I did not seek any advice or assistance from other lawyers, including B.S., respecting the Article or the campaign.

17. As a result of Premier Stelmach cancelling his visit at the February 8, 2008 fundraising breakfast, the Candidate proposed another agenda for another fundraiser in which he would be the keynote speaker. However, P.W., the VP Social Events for the PC Association, proposed other senior government members to speak and reminded the Candidate that the purpose of the event was to raise funds for the constituency association.

The Candidate then emailed T., the Campaign Manager, about the interference from P.W., who had no role in the Campaign Team and the fact that fundraising for the Association was now prohibited by law as the election had been called on February 4, 2008. **(Exhibit 32, 33, 35)**

18. T. responded with an email to the Candidate complaining about the Candidate's unilateral decisions and not following the advice of his campaign team. This February 7th, 2008 email ("February 7th email") was forwarded to me and B.S. with the following preface:

> "FYI. This email is STRICTLY between the three of us until I call for help. I am doing due diligence informing you of a possible pending issue. I do not take lightly legal action against me as I am merely a volunteer"
>
> **(Exhibit 34)**

19. I immediately forwarded the February 7th email to M. who was a journalist and a friend and who I understood was writing a negative article about the Candidate and his campaign and about Premier Stelmach's inability to control the Candidate as a candidate.

20. Approximately 5 hours after I had received the February 7th email from T., I apparently received another email from T. that was also sent to B.S. and stated:

> "All appears to have been resolved. I have a promise he will be professional and focused on non-Afghanistan related issue"
>
> **(Exhibit 36)**

21. I did not have authority from T., or anyone else, to forward the February 7th email to anyone including the journalist, M. I did not forward the subsequent email of T. to M. indicating that all problems that were contained in the February 7th email had been resolved. I did not inform M. that the February 7th email should not be used or relied upon.

22. On the morning of February 12, 2008, M. and I had email discussions prior to the publication of the Article. M. wrote to me:

> I see the death spiral for the Candidate continues. Any more dirt? Column runs tomorrow.
> Hugs, M.

I responded as follows:

> OMG, it's all bad. I am dealing at this very moment with his official/financial agent who is resigning today.

M. then quickly responded to me as follows:

> Can you let me know if he/she does actually resign? Appreciate that. Talked to H. and L.. They've never seen anything like this guy before…

I responded to M. that same morning as follows:

> The Premier is making an announcement in an hour – specifically requested the Candidate's attendance there, to have a chat. He "declined". Wowzers. It's all bad.

M. immediately responded with "Are you shitting me?" and I replied:

> Nope: I was standing with VP of the party at a fundraiser breakfast this morning when he picked up the voicemail, and he let me listen to it. We were just incredulous.
>
> **(Exhibit 37)**

23. The Article appeared online late in the evening of February 12, 2008, and published in the print edition of a newspaper on February 13, 2008, as well as another newspaper. The Article ran under the headline "xxxxxx" in the newspaper and "xxxxxx" in the other newspaper.

(Exhibit 38, 39, 40)

24. After reading the Article, I was sick and embarrassed. I believed that the Article was unbalanced and wholly negative, thereby leaving a misleading and false impression about the Candidate and the campaign. However, I did not take any steps to have the Article retracted, amended or changed.

25. On February 13, 2008, I responded to T., B.S. and S.D., simply with the response:

> Subject: M.:
> Oh. My. God.
>
> **(Exhibit 46)**

26. I did not at any time inform the Candidate, T., or B.S. that I was a source of the information contained in the Article and that I had forwarded the February 7th email to M.

27. Prior to the publication of the Article, I did have telephone conversations with M. and I was informed that other sources he relied on were R.L. and A.H. who were known to me, and had been involved in previous PC election campaigns.

28. I did not advise T. or B.S. that I had informed M. through emails and the forwarding of the February 7th email of the problems with the Candidate's campaign nor that those problems from T.'s perspective had been resolved. I remained silent and did not disclose at any time that I was the insider source on the Candidate's Campaign Team that provided negative information about the campaign to M.

29. I believed I had M.'s promise that he would not disclose that I was a source for the Article nor that I had discussions with him about the Candidate's campaign.

30. I did not advise M. to speak to the Candidate prior to the publication of the Article.

31. On March 3, 2008, the Candidate lost his bid to become the MLA for the riding.

32. On May 6, 2008, M. requested a copy of the February 7th email as he no longer had a copy. Although I did not trust M. because of the publication of the Article, I did send him the February 7th email again on the following condition:

> As promised. (and as per YOUR "Promise, promise, promise") ☺
>
> **(Exhibit 54)**

33. The promise I referred to in my email was simply to remind M. that he had promised earlier not to disclose to anyone that I was the insider source and had provided to him the February 7th email.

34. Following the 2008 Provincial Election, the Article remained available on the media websites and the Action is continuing against the media Defendants and myself.

35. I have taken no steps to correct any false or misleading impression caused by the Article nor have I requested that the Article be deleted and be no longer available on any website or internet search.

36. I admit that I breached T.'s condition of strict confidence in respect of the February 7th email. At the time of the breach, I believed I was not acting in my capacity as legal counsel but in my capacity as a volunteer PC quadrant chair.

37. In February of 2008, it became apparent to me that the Candidate was adverse to the Premier and to the PC party. However, I understood that the mandate of the Campaign Team was to get the Candidate elected.

38. I admit that my role as legal counsel for the Campaign Team did not include communications with the media. I acknowledge that my responsibilities included being available to provide legal counsel to the Candidate and the Campaign Team.

39. I was aware that the Candidate wanted to prepare a rebuttal to the Article but no rebuttal was published by the media Defendants in the Action.

40. I never advised the Candidate that I was in contact with M. or the media during the election campaign. I did not advise the Candidate or the Campaign Team that I was conflicted with respect to my loyalty to the Progressive Conservative Party of Alberta and to the Campaign Team.

41. I did not inform or advise anyone that when I was emailing M., I was not acting in my capacity as legal counsel to the Campaign Team but rather in my capacity as a PC volunteer.

42. I have never apologized to the Candidate or to the Campaign Team for my indiscretion and disclosure of confidential information. I have apologized to T. I have agreed to and will provide a formal apology to the Candidate and to T.

LACK OF CANDOR

43. After accepting my dual role as the Candidate's official agent and legal counsel for the Candidate's Campaign Team, I did provide legal advice during the election campaign as follows:

    a. Setting up the bank account for the campaign funds;
    (Exhibit 23)

    b. The financing of potential radio advertisements;
    (Exhibit 22)

    c. Section 133 Election Act letter for volunteer door knocking;
    (Exhibit 29)

    d. Arranging and attending to the execution of the official nomination papers on February 13, 2008; and
    (Exhibit 48)

    e. Reimbursement of expenses through signed donor cheques.
    (Exhibit 49, 50)

44. I did not advise M. that the February 7th email which I had forwarded to him should not be used or relied upon nor that I apparently received a subsequent email from T. that stated that all of the issues and problems identified in the February 7th email appeared to have been resolved.

45. On February 12, 2008, M. requested "more dirt" from me. I told him that the Chief Financial Officer was resigning that day and I was dealing with it. On February 12, 2008, I

emailed M. and said "OMG, it's all bad. I am dealing at this very moment with his official/financial agent who is resigning today".

(Exhibit 37)

46. I understand that the Chief Financial Officer, S.D. says that he did not threaten to quit in an email that he sent to T. on February 13, 2008.

(Exhibit 43)

47. My recollection is S.D. was, in fact, considering resigning and I specifically advised him to stay with the Campaign.

48. Prior to the publication of the Article, I told M. that all of the Campaign Team's brochures fell off a pickup on Deerfoot Trail tying up traffic, while workers scurried between cars retrieving thousands of pamphlets that whipped into a paper blizzard that caused traffic problems and the Police were called.

(Exhibit 38)

49. I told M. that this was an omen. He reported in the Article that I "gleefully" described this event. However, I since been advised that, in fact, two boxes of brochures were accidently dropped on Deerfoot Trail and later picked up by T.

(Exhibit 24, 25, 26)

50. The Article contained negative comments about the Candidate and his campaign. M. believes that I was the source of the following comments:

    a. Stelmach got wind of the Candidate's planned speech topic – Afghanistan and "only vigorous arm twisting by his campaign team..." got him to change the topic;

    b. "This and other off script comments have put the campaign moral into a tail spin and complicated volunteer recruitment;

    c. "Candidate's handlers insist the worst is over"; and

    d. "Even so, his Financial Agent was rumored to be on the verge of quitting"

    (Exhibit 38, 39, 40)

ADMISSION OF FACT AND GUILT

51. I admit the facts and statements in this Agreed Statement of Facts for the purposes of these proceedings.

52. I admit my guilt to Citations 1 and 2 directed by a Conduct Committee Panel on February 19, 2013, for the purposes of Section 60 of the Legal Profession Act.

THIS AGREED STATEMENT OF FACTS AND ADMISSION OF GUILT IS MADE THIS 26th DAY OF MAY 2014.

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KRISTINE ROBIDOUX QC