

This is exhibit "I" referred to in the affidavit of Lionel Andre Bouchard

made before me at Maple Ridge this 8 day of Apr 192011

[Signature]  
A Commissioner of the Peace

FOR THE PURPOSES OF...

CHARTER OF THE DISTRICT OF...  
I HEREBY CERTIFY THAT...

SECTION 2 OF THE DISTRICT OF...  
I HEREBY CERTIFY THAT...

SECTION 3 OF THE DISTRICT OF...  
I HEREBY CERTIFY THAT...

SECTION 4 OF THE DISTRICT OF...  
I HEREBY CERTIFY THAT...

SECTION 5 OF THE DISTRICT OF...  
I HEREBY CERTIFY THAT...

SECTION 6 OF THE DISTRICT OF...  
I HEREBY CERTIFY THAT...

I  
J  
K  
L  
M  
N  
O



# HOOK & SMITH

Barristers, Solicitors and Notaries Public

201 - 3111 Portage Avenue

Winnipeg, Manitoba

CANADA

R3K 0W4

Tel: (204) 885-4520

Fax: (204) 837-9846

E-Mail: wsmith@hookandsmith.com

Dennis A. Smith, LL.B.

Bernard Toews, B.A. LL.B.

Winston F. Smith, Q.C.

Grant W. Davis, B.A. LL.B.

Sarah Thurmeier, B.A. Adv. LL.B.

Gordon P. Hook (Retired)

Garry N. Harvey (1944-1998)

File No 11090S

September 5, 2008

## Winnipeg Land Titles Office

276 Portage Avenue

Winnipeg, MB R3C 0B6

Attention: Mr. Barry C. Effler, Deputy Registrar General and District Registrar

Dear Sir:

### Re: Complaint concerning employee Lynda Staub

I act for Mr. Lionel Bouchard, an 84-year-old gentleman, who is in the midst of a dispute with his son, André Lionel Bouchard. Your employee, Lynda Staub, is a daughter of my client and her recent actions could have caused serious financial loss by my client.

To protect his claim against his son as an unpaid vendor and his entitlement to a life estate in a residence on land sold to his son, my client caused two caveats to be registered in the Portage La Prairie Land Titles Office. With knowledge that her father, my client, had retained our firm to enforce his rights against his son as claimed in the caveats, it is our belief that Lynda Staub drafted discharges of those caveats for her brother so that he could have my client sign them. Luckily, my client resisted signing the discharges.

It is our opinion that an investigation by your office will confirm that your employee acted outside her authority as an employee of the Land Titles Office in drafting and providing the discharges of two caveats to her brother. Such an investigation will also confirm that your employee not only purposely acted in such a manner as to effectively deprive my client of his right to consult counsel, but also interfered with my professional relationship with my client when I believe she had full knowledge of her father's claims as stated in the



caveats and the fact that he had retained legal counsel to pursue those claims. Furthermore, she took advantage of an 84 year old gentleman.

If the discharges had been signed and registered, my client would have suffered substantial and irreparable damage, especially when the issue of his entitlement to a life estate was before the court and due to be heard only a few days (August 13, 2008) after the discharges were presented to him to sign.

Enclosed herewith are copies of the discharges that were brought to my office by my client with the explanation as to how he received them and with advice that they had not been signed, fortunately, although my client was under substantial pressure to sign them. Also enclosed are copies of the caveats themselves.

I respectfully request your investigation into the actions of Lynda Staub and such discipline as is justified by the results of your investigation.

Yours truly,

**HOOK & SMITH**

Per: **FILE COPY**

**Winston F. Smith, Q.C.**

WFS/ca  
Enclosure

- cc. The Law Society of Manitoba
- cc. Lionel Bouchard
- cc. Chapman Goddard Kagan  
Attention: Kelly Land, Solicitor for André Bouchard

*Please Proceed  
with Complaint  
Lionel Bouchard*



Where an instrument registered that does not conform with the form prescribed by regulation, the Registrar General and the District Registrar disclaim liability for loss resulting from the non-conformance.

Manitoba  
Consumer and  
Corporate Affairs  
Land Titles

# DISCHARGE Form 12

District of PORTAGE LA PRAIRIE

1. APPLICANT(S) include address and postal code  
LIONEL ANDRE BOUCHARD, c/o 12345 - 234<sup>th</sup> Street, Maple Ridge, B.C. V2X 0N7

2. NATURE OF APPLICATION see schedule

- Full Discharge of Instrument No. 1112240
  - Mortgage
  - Caveat
  - Other (specify) \_\_\_\_\_
- Partial Discharge of Instrument No. \_\_\_\_\_
  - Mortgage
  - Caveat
  - Other (specify) \_\_\_\_\_

3. LAND DESCRIPTION Complete only for a Partial Discharge.  
DO NOT Complete for a Full Discharge.

THIS IS EXHIBIT "A" REFERRED TO IN THE  
AFFIDAVIT OF Lionel Andre Bouchard  
SWORN BEFORE ME AT THE City of Maple Ridge IN THE PROVINCE OF British Columbia  
THIS 7 DAY OF May 2009

CHERYL BENNEWITH  
Notary Public  
22881 McPhillips Ave  
Maple Ridge, B.C. V2X 3C1  
467-5555

TITLE NUMBER(S) 1901750 & 1901751

4. SIGNATURE OF APPLICANT(S) see schedule

*Strike out inappropriate statement(s) and initial "*

~~Please discharge the above instrument  
IN FULL, all money due or to grow due on same has been paid.~~

~~OR  
IN PART, only as to the land set out in Box 3,  
amount of \$ \_\_\_\_\_ acknowledged.~~

2. The above instrument has not been assigned except as follows:

DATE
Y M D
2008

LIONEL ANDRE BOUCHARD

<p>Witness</p>	<p>Name</p>	<p>Signature</p>
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By filing this document with the Registrar, the declarant certifies that the information is true and correct and that the instrument complies with the requirements of the Land Titles Act.





PORTAGE LA PRAIRIE

APPLICANTS (include address)

LIONEL ANDRE BOUCHARD, c/o 12345 - 234th Street, Maple Ridge, B.C. V2X 0N7

NATURE OF APPLICATION

\* see schedule

(attach evidence as schedule, if required)

Full Discharge of Instrument no. 1112241

Mortgage  Caveat

Other (specify) \_\_\_\_\_

Partial Discharge of Instrument no. \_\_\_\_\_

Mortgage  Caveat

Other (specify) \_\_\_\_\_

DESCRIPTION

Complete only for a Partial Discharge.  
DO NOT Complete for a Full Discharge.

THIS IS EXHIBIT "B" REFERRED TO IN THE  
AFFIDAVIT OF

Lionel Andre Bouchard

SWORN BEFORE ME AT THE City of Maple  
Ridge IN THE PROVINCE OF British Columbia

THIS 7 DAY OF May 2009.

CHERYL BENNEWITH  
Notary  
2235 Woodhurst Ave  
Maple Ridge, B.C. V2X 3C1  
467-5555

FILE NUMBER(S) 1901750 & 1901751

\* see schedule

SIGNATURES OF APPLICANTS

\* strike out inappropriate statement(s) and initial by party(s) signing

~~Please discharge the above instrument~~

~~If full or all money due or to grow due on same has been paid.~~

~~XXX~~

~~and only as to the land set out in Box 3~~

~~acknowledged~~

~~The above instrument has not been assigned except as follows:~~

DATE		
Y	M	D
2008		

LIONEL ANDRE BOUCHARD

Address

Name

Signature

Address

Name

Signature