

Donald Broder  
57 West Edge Road  
Cochrane, Alberta  
T4C 1M7

December 15, 2011

Law Society of Alberta  
500, 919 – 11<sup>th</sup> Avenue S.W.  
Calgary, Alberta  
T2R 1P3

Attention: Katherine A. Whitburn

Complaint against Bryan Kickham

This formal complaint would rely on the same two manuals as provided with the Elizabeth MacInnis complaint file # CO200090785.

*Also supported by the website:* [www.broderbuck.com](http://www.broderbuck.com)

- Relevant documents included.

**Citations:**

1. It is alleged that Bryan Kickham brought the profession into disrepute by failing to deal with a deceased's estate in a conscientious, respectful, and unprejudiced manner to all the Beneficiaries, thereby breaching Chapter 6 of *The Code of Professional Conduct*, and that such conduct is conduct deserving of sanctions.
2. It is alleged that Bryan Kickham colluded with contacting Joseph Kueber and orchestrating his testimony at the trial of action 9703-12949, and that such conduct is conduct deserving of sanctions.
3. It is alleged that Bryan Kickham is in breach of *The Legal Profession Act*, and that such conduct is conduct deserving of sanctions.
4. It is alleged that Bryan Kickham conspired with the Plaintiffs solicitor to deceive the Courts as to the first time Alberta *Rules of Court* Rule 129 was raised to ensure Estoppel would not prevent the Principle of Relation Back, for which MacInnis was relying on to add the Personal Representatives to the said action, and that such conduct is conduct deserving of sanctions.
5. It is alleged that Bryan Kickham is in breach of his fiduciary duty, and that such conduct is conduct deserving of sanctions.

6. It is alleged that Bryan Kickham is in breach of *The Code of Professional Conduct*.
7. It is alleged that Bryan Kickham participated with other solicitors to commit fraud on the Courts, and that such conduct is conduct deserving of sanctions.
8. It is alleged that Bryan Kickham, knowing and willingly assisted with orchestrating the outcome of Court of Queens Bench Action 9703-12949, and that such conduct is conduct deserving of sanctions.
9. It is alleged that Bryan Kickham, participated with framing Donald Broder, to protect the Plaintiffs Solicitor Elizabeth MacInnis from ambushing herself, and that such conduct is conduct deserving of sanctions.
10. It is alleged that Bryan Kickham filed an Amended Statement of Defence to the Amended Amended Statement of Claim on January 9, 2004, just 10 days before the scheduled trial, backdated the FIAT to January 9, 2003 and forged the Judges second signature, and that such conduct is conduct deserving of sanctions.
11. It is alleged that Bryan Kickham sole purpose of Amending the Statement of Defence was to conceal from the trial Judge that the Original Statement of Defence had raised the issue of standing / lack of Personal Representatives, and that such conduct is conduct deserving of sanctions.
12. It is alleged that Bryan Kickham did not ensure *Alberta Rules of Court* Rule 239 was complete and included a copy of all the pleadings, and that such conduct is conduct deserving of sanctions.
13. It is alleged that Bryan Kickham was orchestrating the pleadings to circumvent his client Donald Broder from relying on *Rocklake Enterprises Ltd. vs. Timberjack Inc.* Docket: 9903-0378-AC, and that such conduct is conduct deserving of sanctions.

Should you require clarification regarding any of the allegations or more documentation please, do not hesitate to call the undersigned.

Yours truly,

Donald Broder  
Phone: 403-932-9992  
Fax: 403-932-5739

