

**IN THE MATTER OF PART 3 OF THE
LEGAL PROFESSION ACT, RSA 2000, c. L-8**

AND

**IN THE MATTER OF A HEARING REGARDING
THE CONDUCT OF NATALIE REEDER
A MEMBER OF THE LAW SOCIETY OF ALBERTA**

Single Bencher Hearing Committee

Adam Drew – Chair

Appearances

Shane Sackman – Counsel for the Law Society of Alberta (LSA)

C. John Hooker – Counsel for Natalie Reeder

Hearing Date

February 12, 2026

Hearing Location

Virtual Hearing

HEARING COMMITTEE REPORT - SANCTION

Overview

1. The following citations were directed to hearing by the Conduct Committee Panel on May 13, 2025:
 - 1) It is alleged Natalie M. Reeder improperly commissioned an affidavit and that such conduct is deserving of sanction.
 - 2) It is alleged Natalie M. Reeder failed to correct an improperly commissioned affidavit with the Court in a timely manner and that such conduct is deserving of sanction.
2. In January of 2023, Ms. Reeder was counsel for MN in a divorce and related civil litigation. In this capacity, Ms. Reeder improperly commissioned a document by falsely executing it, claiming she had witnessed MN's signature when she had not. Further, it is acknowledged that the signature was forged by an unknown person, and that the unknown person must have been an employee of Ms. Reeder's firm. While MN had previously seen a version of the affidavit in question, the document was altered after having been provided to MN.

3. Further, Ms. Reeder filed this improper affidavit with the Court as part of legal proceedings, and after being made aware that it was falsely-executed, Ms. Reeder did not act promptly to correct the court record. In fact, she did not correct the record until prompted to do so by the LSA.
4. The LSA and Ms. Reeder entered into a Statement of Admitted of Admitted Facts and Admission of Guilt (Agreed Statement) in relation to Ms. Reeder's conduct. The Agreed Statement, appended to this Report, sets out the relevant facts.
5. The Conduct Committee found the Agreed Statement acceptable. Accordingly, pursuant to section 60(4) of the *Legal Profession Act (Act)*, it is deemed to be a finding of this Hearing Committee (Committee) that Ms. Reeder's conduct is deserving of sanction in relation to the above citations.
6. On February 12, 2026, the Committee convened a hearing into the appropriate sanction.
7. After reviewing all of the evidence and exhibits, and hearing the submissions of the LSA and Ms. Reeder, for the reasons set out below, the Committee has determined that the proposed sanction of a fine and reprimand, plus agreed costs, is appropriate.

Preliminary Matters

8. There were no objections to the constitution of the Committee or its jurisdiction, and a private hearing was not requested, so a public hearing into the appropriate sanction proceeded.
9. As Ms. Reeder was represented by Mr. C. John Hooker, with whom I have regular professional dealings, I made additional inquiries of Ms. Reeder and the LSA as to whether there were any concerns with the constitution of the Committee, and both parties confirmed that there were no objections.

Agreed Statement of Facts/Background

10. After the commencement of proceedings in relation to Ms. Reeder's conduct, Ms. Reeder submitted the Agreed Statement. The Conduct Committee found the Agreed Statement acceptable on December 9, 2025. Pursuant to section 60(4) of the *Act*, each admission of guilt in the Agreed Statement is deemed to be a finding by this Committee that Ms. Reeder's conduct is deserving of sanction under section 49 of the *Act*.
11. As provided by subsection 60(3) of the *Act*, once the Agreed Statement was accepted by the Conduct Committee, the hearing into the appropriate sanction could be conducted by a single Bencher. As a result, I was appointed to conduct the sanction hearing.

Submissions on Sanction

12. Counsel for both parties jointly submitted that the appropriate sanction is a reprimand and fine of \$4,500.00 and that Ms. Reeder pay costs of \$3,500.00.
13. LSA counsel noted that the primary aggravating features to be Ms. Reeder's prior disciplinary history, and that the commissioning of the affidavit was an act of falsehood, not mere inadvertence. He noted, however, that the false affidavit was not substantively different from the correct version, and that no major harm was done to the actual proceedings. He stressed that the purpose of the sanction is to restore public confidence.
14. Counsel for Ms. Reeder made submissions regarding her challenging personal and professional circumstances at the time the conduct in question occurred. He noted also the humiliation that resulted from the ensuing investigations, not just by the LSA but also by police. He noted that Ms. Reeder's firm has continued to operate, and that this matter has been "hanging over her head" since 2023.

Decision on Sanction

15. Counsel for the LSA and Ms. Reeder confirmed their understanding that the Committee is not bound by a joint submission on sanction. That said, a hearing committee is required to give significant deference to a joint submission and should not depart from a joint submission on sanction unless it would bring the administration of justice into disrepute or is otherwise contrary to the public interest.
16. The LSA provided a book of authorities setting out the range of sanctions for comparable conduct: *Law Society of Alberta v. Stephen*, [1994] L.S.D.D. No. 218; *Law Society of Alberta v. Bittner*, [2002] L.S.D.D. No. 52; *Law Society of Alberta v. Gish*, 2006 ABLS 132; *Law Society of Alberta v. Coley*, [2008] L.S.D.D. No. 162; *Law Society of Alberta v. Scott*, 2025 ABLS 21. These cases were specifically referred to by way of showing penalties both more and less serious, and were very helpful in assessing the appropriateness of the joint submission.
17. The approach taken by both Ms. Reeder and the LSA in dealing with this matter through an agreed statement and admission of guilt also avoided an unnecessary contested hearing, witness inconvenience, and process costs.
18. I found that the joint proposal was within the range of sentences and would not bring the administration of justice into disrepute or be otherwise contrary to the public interest. In specific, I find that the penalty appropriately addresses the seriousness of the conduct and strikes a fair balance in denouncing the conduct and restoring the public confidence in the legal profession.

19. I issued an oral reprimand at the hearing, as follows:

The Hearing Guide of the Law Society requires that Hearing Committees take a purposeful approach to sanctioning a member who has been found guilty of conduct deserving of sanction. The fundamental purpose of sanctioning is the protection of the best interests of the public and the protection of the reputation and standing of the legal profession generally.

Ms. Reeder, I acknowledge your co-operation with the Law Society leading up to today and resolving these complaints by admitting guilt and by proceeding with a single-Bencher hearing. Your admissions have permitted these citations to be resolved on a more efficient basis, which is not just a benefit to you, but is a benefit to the public and to the Law Society.

Ms. Reeder, you are an experienced lawyer, having practiced for over 15 years. It is clear to me that you have a long and principled career having made significant contributions to the administration of justice in Alberta. Your career has been largely exemplary until the last few years, wherein you have faced citations and a mandatory conduct advisory.

I also note that these citations arose following a major disruption in your office and professional life. I expect that facing these citations now, particularly after previous citations and a mandatory conduct advisory, is an enormous disappointment to you at this stage in your career

You have admitted guilt on two citations. Those citations are serious and have the potential for serious consequences. While there were no serious consequences to the public and there was no loss, and there is no finding that you were directly responsible for the alteration of the affidavit, there was a complaint and a significant investigation. The integrity of legal documents is one of the many structures that upholds public confidence in the administration of justice, and as such even a casual breach of that structure must be treated seriously.

In these matters, you put your professional reputation and integrity at risk and your clients' interests at risk. In making these comments today and in expressing this reprimand today, I urge you to constantly have at the forefront of your mind and your practice the integrity required of all of us as members of this profession and the diligence that we all must demonstrate to protect our clients' interests and to maintain our reputation and the reputation of this profession, and the great trust that the public puts in us to uphold the structures underpinning the rule of law.

In concluding, I wish you the best as you move forward from these very difficult circumstances and thank you for your attendance today.

Matter of Referral to the Attorney-General

20. Section 78(6) of the *Act* states that if a “Hearing Committee... is of the opinion that there are reasonable and probable grounds to believe that the member has committed a criminal offence, the Hearing Committee or the panel, as the case may be, shall forthwith direct the Executive Director to send a copy of the hearing record to the Minister.”
21. “Reasonable and probable grounds” is not defined in the *Act*.
22. Counsel for the LSA and Ms. Reeder jointly proposed that no notice to the profession was required. They agreed, however, that the requirement under the *Act* for this panel to refer a matter to the Attorney-General is an analysis made independently of the assessment of the joint submission on penalty, and thus deference was not owed to the submissions.
23. Counsel noted that the behaviour which is the subject matter of the complaint also potentially made out an offence under section 138 of the *Criminal Code of Canada*, as follows (emphasis added):

Every person is guilty of an indictable offence and liable to imprisonment for a term of not more than two years or is guilty of an offence punishable on summary conviction who

 - (a) **signs a writing that purports to be an affidavit or statutory declaration and to have been sworn or declared before him when the writing was not so sworn or declared** or when he knows that he has no authority to administer the oath or declaration,
 - (b) uses or offers for use any writing purporting to be an affidavit or statutory declaration that he knows was not sworn or declared, as the case may be, by the affiant or declarant or before a person authorized in that behalf, or
 - (c) signs as affiant or declarant a writing that purports to be an affidavit or statutory declaration and to have been sworn or declared by him, as the case may be, when the writing was not so sworn or declared.
24. Based on the mandatory nature of the wording in the *Act*, I delivered the judgment on sanction and reprimand on February 12, 2026, and invited further written submissions from counsel on this discrete issue. I asked counsel in particular to make submissions on the nature of the “reasonable and probable grounds” test, and what, if anything, the Committee should assess with regards to the *mens rea* of the potential offence. I have found those supplementary submissions extremely helpful in this analysis and I thank counsel for them.

25. Counsel for Ms. Reeder cited *R. v. Beaver*, 2022 SCC 54, with special attention to paragraph 72, for this principle, wherein the Supreme Court undertook a detailed analysis of “reasonable and probable grounds,” albeit in very different circumstances.
26. I note and summarize the following relevant analysis from *R. v. Beaver*:
- 1) Reasonable and probable grounds are assessed on both a subjective and objective basis. The person making the assessment (a police officer in *Beaver*; in this case, the panel) must subjectively have the grounds, and those grounds must be objectively reasonable.
 - 2) The “grounds must be justifiable from an objective viewpoint. This objective assessment is based on the totality of the circumstances known... at the time.
 - 3) Reasonable and probable grounds require a “reasonable probability” of an offence having been committed, not merely a “reasonable suspicion.”
 - 4) The offence need not be made out on a balance of probabilities.
 - 5) The person making the assessment need not seek out alternative explanations nor evidence to the contrary.
27. Counsel also directed me cases where offences under section 138 were adjudicated, and to cases where law society hearing panels considered referrals in similar circumstances.
28. There appears to be broad agreement in the regulatory cases that the assessment of “reasonable and probable grounds” that the member has committed a criminal offence is in part based on experience and common sense. This appears to have led to, as counsel for the LSA put it, “varying degrees of ‘rigour’ applied to the reasonable and probable grounds standard in LSA disciplinary decisions.
29. As to cited decisions around s. 138 of the *Criminal Code*, both counsel directed me to *R. v. Gill*, 2023 ABCJ 263 and *R. v. Chow*, 1978 CanLII 1809 (SKCA).
30. The conclusion of the parties is that section 138 is not a strict liability offence, and therefore there must be evidence of both the *actus reus* and the *mens rea* of the offence. The *mens rea* appears, based on the analysis in *Chow*, to be something more than simply failing to prevent procedural deficiencies. The Court in *Chow* further contemplates whether some action or actions on the part of the accused person can generate an environment “sufficient to constitute the ceremony of swearing,” and that such an environment can act as a defence.

31. The parties agreed that the *actus reus* of the offence described in section 138 is made out by Ms. Reeder's admissions, and that if the analysis were to end there, referral to the Minister would be justified. Both parties, however, argue that the panel must also consider whether there are reasonable and probable grounds supporting the *mens rea* of the offence, and both counsel submit – based largely on the reasoning in *Chow* – that the grounds are insufficient on that point.
32. The Committee concludes that the plain language of section 78 of the *Act* leaves very little discretion, but that there is certainly some room to engage in an objective and common-sense analysis of the evidence before the panel, and the elements of any purported offence.
33. I am persuaded that while I may have a **suspicion** that Ms. Reeder's admitted conduct makes out an offence under section 138, I am not satisfied that I have reasonable and probable grounds to believe the member has committed a criminal offence. The assessment I have conducted suggests that her *mens rea* at the time of the conduct does not sufficiently rise to reasonable and probable grounds on an objectively justifiable standard.
34. I therefore find I am not required to refer this matter to the Attorney General, and I make no such referral.

Concluding Matters

35. Ms. Reeder received an oral reprimand and was ordered to pay a fine of \$4,500.00 and costs of \$3,500.00, collectively to be paid within one year of the hearing date.
36. There will not be a referral to the Attorney-General.
37. A notice to the profession is not ordered.
38. The exhibits, other hearing materials, and this report will be available for public inspection, including the provision of copies of exhibits for a reasonable copy fee, except that identifying information in relation to persons other than Natalie M. Reeder will be redacted and further redactions will be made to preserve client confidentiality and solicitor-client privilege (Rule 98(3)).

Dated May 28, 2026.

Adam Drew, KC

Appendix A – Statement of Admitted Facts, Exhibits and Admissions of Guilt

IN THE MATTER OF THE *LEGAL PROFESSION ACT*

- AND -

IN THE MATTER OF A HEARING REGARDING THE CONDUCT OF
NATALIE M. REEDER
A MEMBER OF THE LAW SOCIETY OF ALBERTA

HEARING FILE HE20250096

**STATEMENT OF ADMITTED FACTS, EXHIBITS
AND ADMISSIONS OF GUILT**

Background of Member

1. On August 29, 2008, I was admitted as a member of the Law Society of Alberta (the “LSA”).
2. My current status with the LSA is Active/Practicing.
3. I have a prior disciplinary history as follows:
 - a. I was found guilty of conduct deserving of sanction in *Law Society of Alberta v Reeder*, 2025 ABL 14. I received a reprimand, a fine of \$5,000 and costs for the following citations:
 - (1) It is alleged that Natalie M. Reeder failed to identify a potential conflict situation and/or failed to discharge her obligations under section 7.2-12 of the *Code*, and that such conduct is deserving of sanction.
 - (2) It is alleged that Natalie M. Reeder breached a Court Order by continuing to provide legal services to a client, after she and her firm had been disqualified from acting, and that such conduct is deserving of sanction.
 - (3) It is alleged that Natalie M. Reeder submitted her own affidavit evidence to the Court, and made submissions on that evidence as legal counsel, and that such conduct is deserving of sanction.
4. I also received a Mandatory Conduct Advisory on October 3, 2024, addressing issues relating to civility, my responsibilities to junior lawyers and to be cautious when entering a business transaction with a client.

Tab 1 – Mandatory Conduct Advisory dated October 2, 2024

5. I also received a caution letter on May 13, 2025, regarding acting in a manner that was careless or inconsistent with proper judgment and falling short in my obligations when dealing with junior staff.

Tab 2 – Letter of Caution dated May 13, 2025

6. My practice is primarily focused on estate planning, family law, corporate solicitors' work and some civil litigation.

Procedural Background

7. This hearing arises from one complaint: [complaint number].
8. On May 8, 2023, the LSA received a complaint from [WN]. [WN] raised concerns with an affidavit filed by Ms. Reeder's office.

Tab 3 – Information Concerning a Lawyer dated May 9, 2023

9. I was interviewed by LSA investigators on October 4, 2023.

Tab 4 – Interview Transcript dated October 4, 2023

10. I provided a response to the allegations in this matter on May 7, 2024.

Tab 5 - Response Letter from Ms. Reeder of May 7, 2024

11. The LSA conducted a review of the allegations, resulting in a referral to the Conduct Committee.
12. On May 13, 2025, the Conduct Committee directed that the following two citations be dealt with by a Hearing Committee:
 - a. It is alleged Natalie M. Reeder improperly commissioned an affidavit and that such conduct is deserving of sanction.
 - b. It is alleged Natalie M. Reeder filed an improperly commissioned affidavit with the Court and that such conduct is deserving of sanction.

Tab 6 – Citations

13. The parties agreed to amend citation 2, this amendment was approved by the PHC Chair as follows:
 2. It is alleged Natalie M. Reeder failed to correct an improperly commissioned affidavit with the Court in a timely manner and that such conduct is deserving of sanction.

Tab 7 – Amended Citations

Lawsuit and Affidavit

14. I acted for [MN] in divorce matters and in a civil claim over the validity of intra-familial loans.
15. During that civil claim, I drafted a response affidavit for [MN] relating to contested loans (the "Affidavit").
16. On January 13, 2023, I emailed a copy of the Affidavit to [MN] to sign.

Tab 8 – Email dated January 13, 2023 and Attached draft Affidavit

17. [MN] signed the signature page of Affidavit and returned it to me later that day.

Tab 9 – Email dated January 12, 2023 with Attachment

18. [MN] never sent me the original of the signed Affidavit or signature page.
19. I asked my staff to assemble the affidavit and to use the emailed signature page. To the best of my recollection, my assistant [S] would have assembled the Affidavit.
20. I executed a copy of the Affidavit verifying that I saw [MN] sign.
21. I admit that I did not see [MN] sign the Affidavit, as I only received an email copy of her signature.
22. I occasionally took electronic signatures from clients after speaking to them on the phone or facetimeing them while they signed the documents.
23. I admit that I did not face time with [MN] in this instance when she executed the Affidavit.
24. I recognize that this is not the proper process for executing an affidavit for a client and I should not have proceeded in this manner.

Circumstances around Affidavit

25. I admit that the Affidavit was altered after [MN] signed it.
26. The alterations to the Affidavit are generally stylistic and formatting variations.
27. Compared to the Affidavit I sent [MN] to sign, the filed Affidavit had the following differences:
 - a. My name was typed under the jurat;
 - b. The signature line for [MN] was moved in location; and
 - c. The last two lines of paragraph 7 on page one is repeated at the top of page two.

Tab 10 – Filed Affidavit dated January 17, 2025

28. I also admit that [MN]'s signature was forged on the Affidavit. I deny that I personally forged [MN]'s signature.
29. At the time this Affidavit was signed, there was considerable acrimony at my office. My previous office manager, who was fired shortly after, had engaged in theft and there were various office personnel issues in and around this time.
30. I do not know who altered the Affidavit or forged the signature.
31. I admit that whoever altered the Affidavit and forged the signature must have been someone at my firm.
32. I admit that my practice of commissioning an affidavit without seeing [MN] sign contributed to this occurring.

Affidavit on the Court Record

33. When I discovered that the Affidavit had been amended and [MN]'s signature was forged, I did not take steps to correct the Affidavit filed at Court promptly.
34. I admit that it slipped my mind that I would need to correct a forged affidavit filed on the Court record. When I later realized this error, I did correct the Court file.
35. I admit that I should have taken steps to remedy the Affidavit filed in Court immediately.

ADMISSIONS OF FACTS AND GUILT

36. I admit as facts the statements in this Statement of Admitted Facts and Admissions of Guilt for the purposes of these proceedings.
37. I admit that:
 - a. I improperly commissioned an affidavit; and
 - b. I failed to correct an improperly filed affidavit on the Court record in a timely manner.
38. When I admit guilt to the conduct described in herein, I admit that the conduct is "conduct deserving of sanction" as defined under section 49 of the *Legal Profession Act*.

ACKNOWLEDGEMENTS

39. I acknowledge that I have received independent legal advice.
40. I acknowledge that I have signed this Statement of Facts, Exhibits, and Admissions voluntarily and without any compulsion or duress.

41. I acknowledge that I understand the nature and consequences of signing this Statement of Facts, Exhibits, and Admissions.

THIS STATEMENT OF ADMITTED FACTS, EXHIBITS, AND ADMISSIONS OF GUILT IS MADE THIS _____ DAY OF _____, 2025.

Natalie Reeder