

**COURT OF APPEAL OF ALBERTA**

**Form AP-1**  
[Rules 14.8 and 14.12]

COURT OF APPEAL FILE NUMBER: **2501-0282AC**

TRIAL COURT FILE NUMBER: 2301 14224

REGISTRY OFFICE: CALGARY

APPLICANT: YUE SONG

STATUS ON APPEAL: APPELLANT

RESPONDENT: THE LAW SOCIETY OF ALBERTA

STATUS ON APPEAL: RESPONDENT

DOCUMENT: **CIVIL NOTICE OF APPEAL**

APPELLANT'S ADDRESS FOR  
SERVICE AND CONTACT  
INFORMATION:

Glenn Blackett Law



Registrar's Stamp



**WARNING**

To the Respondent: If you do not respond to this appeal as provided for in the Alberta Rules of Court, the appeal will be decided in your absence and without your input.

**1. Particulars of Judgment, Order or Decision Appealed From:**

Date pronounced: 12 September 2025

Date entered: n/a

Date served: n/a

Official neutral citation of reasons for decision, if any:

2025 ABKB 525

**2. Indicate where the matter originated:**

Alberta Court of King's Bench

Judicial Centre: Calgary

Justice: S.L. Kachur

On appeal from a King's Bench Applications Judge or a Justice of the Court of Justice?:

No

Official neutral citation of reasons for decision, if any, of the Applications Judge or Justice of the Court of Justice:

n/a

**3. Details of Permission to Appeal, if required (Rules 14.5 and 14.12(3)(a)).**

Permission not required

**4. Portion being appealed (Rule 14.12(2)(c)):**

Whole

**5. Provide a brief description of the issues:**

The appeal arises from an originating application for judicial review seeking various public, private, and constitutional remedies with respect to the Law Society of Alberta's ("**LSA**") adoption and advancement of various political ideologies by means of its actual and claimed statutory powers.

The applicant's primary arguments are that the LSA's actions, including redefinition of professional competence and ethics and programs of continuing professional education are for the objective of and tend to:

- a. undermine the independence of the bar, loyalty to clients, and loyalty to Canada's laws and *Constitution*;
- b. subvert the rule of law and Canada's laws and *Constitution*, including the constitutional and civil rights enjoyed by Canadians thereunder; and

- c. unreasonably infringe on the fundamental constitutional freedoms of the applicant, including those guaranteed under the *Canadian Charter of Rights and Freedoms* (the “**Charter**”),

which actions are unconstitutional, *ultra vires* and abuses of statutory discretion.

The Honourable Justice S. L. Kachur largely refused to consider the evidence or engage the appellant’s arguments on the basis of, respectfully, various legal errors including, primarily:

- a. the Court has no capacity nor legitimacy to review the actions of a statutory delegate which are political in nature;
- b. judicial review is generally limited to review of the records selected for inclusion in a certified record of proceedings by a statutory delegate which sufficiently demonstrate the delegate’s reasoning process, as opposed to all records relevant to the decision or action in the possession of the delegate;
- c. an obligation to affirm the veracity of something a person believes to be false is not an infringement of the fundamental freedom of conscience and religion guaranteed under s. 2(a) of the *Charter* unless worded substantially similar to: “I believe that ...”;
- d. *Charter* rights are not infringed by laws which limit fundamental freedoms unless and until such laws are actively enforced against a person; and
- e. a failure to address the applicant’s claim that the LSA’s actions violate the state duty of religious neutrality under s. 2(a) of the *Charter*,

and on the basis of a failure to give proper effect to the evidence by concluding that the applicant’s evidence was duplicative of the certified record of proceeding.

The action was entirely dismissed with costs.

## **6. Provide a brief description of the relief claimed:**

An order allowing the appeal and:

- a. reversing the order in full, and granting the appellant the following relief:
  - i. an order that the LSA shall produce a legal opinion and its full “Regulatory Objectives”;
  - ii. a declaration that the Political Profile, the CPD Tool, Rules 67.2 to 67.4 and part 6.3 of the Code (all as defined in the originating application) are *ultra vires*;

- iii. in *certiorari*, setting-aside Rules 67.2 to 67.4 and part 6.3 of the Code;
  - iv. in *prohibition*, prohibiting the LSA from the continuation of its Political Objectives (as defined in the originating application) in any manner;
  - v. an injunction prohibiting the LSA from the continuation of its Political Objectives in any manner;
  - vi. pursuant to section 24 of the *Charter*, a declaration that the LSA's pursuit of its Political Objectives, including the Political Profile, the CPD Tool, Rules 67.2 to 67.4 and part 6.3 of the Code, infringe the appellant's rights under sections 2(a) and 2(b) of the *Charter*, and an injunction prohibiting the LSA from the continuation of its Political Objectives in any manner; and
  - vii. pursuant to section 52 of the *Constitution Act, 1982*, an order striking Rules 67.2 to 67.4 and part 6.3 of the Code.
- b. in the alternative, such relief above as is just and appropriate and such further legal determinations as are just and appropriate, including that:
- i. the Court has capacity, legitimacy and the duty to review LSA's actions, including those which are political in nature; and
  - ii. the appellant's evidence, in full, shall be considered with respect to all relief claimed,
- and an order remitting the matter to the lower Court for a new hearing;
- c. costs of the appeal; and
- d. such other and further relief as counsel may advise and this Honourable Court deems just.

**7. Is this appeal required to be dealt with as a fast track appeal? (Rule 14.14)**

No

**8. Does this appeal involve the custody, access, guardianship, parenting time, decision-making responsibility, contact or support of a child? (Rule 14.14(2)(b))**

No

**9. Will an application be made to expedite this appeal?**

No

**10. Is Judicial Dispute Resolution with a view to settlement or crystallization of issues appropriate?** (Rule 14.60)

No

**11. Could this matter be decided without oral argument?** (Rule 14.32(2))

No

**12. Are there any restricted access orders or statutory provisions that affect the privacy of this file?** (Rules 6.29, 14.12(2)(e), 14.83)

No

**13. List respondent(s) or counsel for the respondent(s), with contact information:**

Jason J. Kully / Leanne Monsma  
FIELD LLP  
Barristers and Solicitors

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] /  
[REDACTED]

*If specified constitutional issues are raised, service on the Attorney General is required under s. 24 of the Judicature Act: Rule 14.18(1)(c)(viii).*

**14. Attachments (check as applicable)**

Order or judgment under appeal if available (not reasons for decision) (Rule 14.12(3))

The form of order has not been entered as of this filing, it will be included in the appeal record in due course.

Earlier order of Applications Judge, etc. (Rule 14.18(1)(c))

Order granting permission to appeal (Rule 14.12(3)(a))

Copy of any restricted access order (Rule 14.12(2)(e))

*If any document is not available, it should be appended to the factum, or included elsewhere in the appeal record.*