



**Tab 7**

## **Audit & Finance Committee**

### **Report to Convocation**

November 26, 2021

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# FOR INFORMATION

## Law Society of Ontario Financial Statements For the nine months ended September 30, 2021

**The Audit & Finance Committee recommends that the financial statements of the Law Society for the first nine months of 2021 be received by Convocation for information.**

This is part of the quarterly financial reporting schedule to Convocation. These interim statements convey the performance of the Law Society before the end of the year. Unlike annual statements, interim statements are not audited.

These financial statements present the financial position and operations of the Society and include the General Funds (or operating funds) and a number of special purpose or restricted funds.

- The Compensation Fund is restricted by the Law Society Act
- The Errors and Omissions Insurance Fund (E&O Fund), the Capital Allocation Fund, the Invested in Capital and Intangible Assets Fund, the County Libraries Fund and the “Other Restricted Funds” (Repayable Allowance Fund, Special Projects Fund and Parental Leave Assistance Fund) are restricted by Convocation.

Information on General Funds and restricted funds is provided in [Appendix A](#).

The Financial Statements for the nine months ended September 30, 2021 comprise the following statements:

- Statement of Financial Position
- Statement of Revenues and Expenses and Change in Fund Balances, detailing results of operations for lawyers and paralegals
- Schedule of Restricted Funds
- Supplemental schedules include Statements of Financial Position for the Compensation Fund and E&O Fund, and Schedules of Revenues and Expenses for the Combined General Funds, Lawyer and Paralegal General Funds, the Compensation Funds and the Errors and Omissions Insurance Fund

## Financial Statement Highlights

The Law Society's financial results for the third quarter ending September 30, 2021 continue to see stability in its revenue streams compared to budget while expenses are lower than planned. The lower than budgeted expenses are driven primarily by impacts of the pandemic; both decisions made in response to COVID-19 and circumstantial factors affecting operating expenses. This is reflected in the results of the General Funds.

Another factor affecting overall excess of revenues over expenses at the end of the third quarter is the solid performance of the financial markets, with the Law Society recognizing realized and unrealized gains on its portfolio investments of the General Fund, Compensation Fund and Errors and Omissions Fund ("E&O Fund") totaling approximately \$5.1 million, for which we do not budget.

### General Fund

The lawyer General Fund shows an excess of revenues over expenses of \$6.2 million at the end of the third quarter of 2021, compared to a budget that planned for excess expenses over revenues of \$7.1 million for the same period. The paralegal General Fund experienced \$848,000 in excess revenues over expenses at the end of the third quarter of 2021 compared to a budgeted excess of expenses over revenues of \$1.1 million for the same period.

The main reason for the positive financial performance in 2021 compared to budget within the General Funds is expenses being less than budget across all departments and driven by the pandemic curtailing operating expenses and cost containment measures implemented by management in response to COVID-19.

The fund balance of the lawyer General Fund is \$36.4 million as of September 30, 2021 which has increased from \$26.8 million at the same time last year. The increase in fund balance is attributable to:

- Strong performance on the investment portfolio over the past year resulting in significant changes in their fair market value, essentially realized/unrealized gains.
- Better than budgeted revenue results related to CPD programs.
- the cost containment measures introduced by management in the spring of 2020 in response to the pandemic that continued into 2021, including renegotiated

contracts related to building services such as cleaning, maintenance and print and mail services.

- circumstantial savings realized because of travel restrictions, a shift to virtual meetings and events, and the resulting effect of no catering costs, with the impact most noted in relation to benchner remuneration and expenses, and stakeholder engagement events.
- Efficiencies resulting from the implementation of online examinations.

The Law Society's Fund Balance Management Policy is to maintain a lawyer General Fund balance within a minimum and maximum benchmark of two to three months of budgeted General Fund expenses. For 2021, the range is \$16.8 million to \$25.2 million. As the lawyer General Fund balance was projected to be above the benchmark, the 2021 budget planned for the use of \$6.2 million of the fund balance to fund operations and reduce the 2021 lawyer annual fees.

The lawyer General Fund is projected to end 2021 with a fund balance of approximately \$32.5 million. As the expected lawyer General Fund balance will continue to be above the benchmark, the 2022 budget incorporates the use of \$6.4 million of the General Fund balance to bring the General Fund balance in line with the Fund Balance Management Policy benchmarks.

The paralegal General Fund balance is \$2.7 million as of September 30, 2021 which is an increase by \$745,000 compared to the same time last year. The paralegal General Fund budget for 2021 incorporates the use of \$1.1 million from the fund balance to fund operations and reduce annual fees for 2021. The paralegal General Fund is projected to the end 2021 with a fund balance of approximately \$1.9 million. As the expected paralegal General Fund balance will be better than budget, the 2022 budget incorporates the use of \$1.15 million of the General Fund balance.

The Law Society's strong financial position at the end of the third quarter in 2021 provides the flexibility required to maintain operations, begin investments in the transition to a new workforce model, continue to temporarily fund the 2021 Annual Fee COVID-19 Deferral Option for licensees and allows the use of available fund balances to fund expenditures in 2022.

## **Restricted Funds**

The Law Society's Restricted Funds report an excess of revenues over expenses of \$3.5 million for the nine months ended September 30, 2021, compared to an excess of revenues over expenses of \$6.1 million in 2020. The key components are:

- a. In the Compensation Fund, an excess of revenues over expenses of \$2.2 million (2020 – \$6.4 million) (further explained in this report).
- b. In the E&O Fund, an excess of revenues over expenses of \$1.9 million (2020 – excess of expenses over revenues of \$449,000) due primarily to changes in the fair value of long-term investments.
- c. Total Restricted Fund expenses increased from \$84.4 million to \$96.5 million as increased premium revenues collected in the E&O Fund are transferred to LAWPRO as a flow through.

## ***Compensation Fund***

The lawyer pool of the Compensation Fund had an excess of revenues over expenses for the nine months ended September 30, 2021 of \$2.2 million compared to a budget that planned an excess of expenses over revenues of \$69,000 for the same period. A combination of unbudgeted changes in the fair market value of the investment portfolio (\$2.1 million) and a lower than budgeted provision for grants expense contributed to this variance. The prorated budget for provision for unpaid grants expenses as of September 30, 2021 was \$3.4 million compared to actual provision for unpaid grant expenses of \$3.1 million. Claims activity within the lawyer pool of the Compensation Fund increased in the third quarter of the year with \$2.3 million of the total provision for grant expenses incurred during this period.

The lawyer pool of the Compensation Fund ended the third quarter with a fund balance of \$32.7 million which exceeds the minimum benchmark per the Fund Balance Management Policy of \$19.6 million. As the expected balance of the lawyer pool of the Compensation Fund will continue to be above the benchmark, the 2022 budget incorporates the use of \$3.7 million of the lawyer pool of the Compensation Fund balance.

The paralegal pool of the Compensation Fund had excess of expenses over revenues for the nine months ended September 30, 2021 of \$30,000 compared to a budget that planned an excess of expenses over revenues of \$60,000 for the same period. Changes in the fair market value of portfolio investments resulted in unbudgeted revenues of \$112,000. This was offset by the provision for unpaid grants expense exceeding budget by \$71,000 as a result of higher claims activity. The paralegal pool of the Compensation Fund balance is \$929,000 as at September 30, 2021.

### ***Errors & Omissions Insurance Fund***

The E&O Fund had net revenues over expenses of \$1.9 million in the first nine months of the year due to changes in the fair market value of the investment portfolio. The E&O Fund balance has increased to \$57.2 million<sup>1</sup> as of September 30, 2021. The 2021 budget includes a transfer of \$1.2 million from the E&O Fund to the lawyer General Fund for operations.

### ***Capital Allocation Fund***

The Capital Allocation Fund had net revenues over expenses of \$1.6 million for the first nine months of 2021 as some capital projects have been delayed due to pandemic related restrictions and supply chain shortages. There are several facility and information technology infrastructure projects in progress that will see spending increase in the last quarter of 2021 and will see spending continue into 2022 with delays in obtaining some of the required supplies and equipment to complete these infrastructure projects.

## **Statement of Revenues and Expenses and Change in Fund Balances**

### **Revenues**

#### ***Annual Fees***

Annual fees recognized in the first nine months of \$67.7 million decreased by \$3.6 million compared to 2020 but are trending favourably when compared to the 2021 budget. The 2021 budget incorporated an annual fee reduction for lawyers and paralegals of \$193 and \$42, respectively. The fee reduction for lawyers was partially offset by a budgeted increase in the number of full-fee equivalent lawyers of 1,075. The 2021 budget did not include an anticipated increase in full-fee equivalent paralegals as there was declining growth in the number of practising paralegals. This trend has stabilized. Annual fee revenue is recognized monthly.

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<sup>1</sup> The E&O Fund balance includes the Law Society's investment of \$35.6 million in its wholly owned subsidiary, LAWPRO.

### ***Insurance Premium and Levies***

Insurance premiums and levies have increased from \$74.4 million in the first nine months of 2020 to \$83.8 million in 2021 primarily due to an increase in transaction levies. This increase is being primarily driven by an increase in the number of transactions comparing year over year.

### ***Professional Development and Competence (“PD&C”)***

PD&C revenues comprise income from the licensing process and continuing professional development (“CPD”). Total year to date revenues of \$14.4 million are higher than the current year-to-date budget of \$13.3 million.

Lawyer licensing process revenues of \$8.7 million are in line with the 2021 budget. Paralegal licensing process revenues of \$1.8 million are higher than the 2021 budget of \$1.4 million. There was an increased number of paralegal licensing candidates in 2020 that deferred their examinations to 2021.

CPD revenues were \$4.0 million at the end of September 2021, which is higher than the 2021 budget of \$3.2 million. The 2021 budget incorporated a reduction of \$2.5 million in CPD revenues from the prior year with the expectation that large group gathering restrictions would continue into 2021. The better than budget performance is attributable to successful delivery of programs virtually with growth in attendance over the past year.

### ***Change in Fair Value of Investments***

The change in fair value of investments across all Funds show total realized and unrealized gains of \$5.1 million compared to unrealized losses of \$2.6 million in the same period in 2020. The change in fair value of investments is not budgeted. The transition to a new investment manager was completed in the third quarter of the year. Investment income of \$1.5 million is slightly lower than last year and budget as interest rates have declined when compared to the same period last year.

### ***Other Revenues***

In the General Funds, other revenues totalling \$5.1 million is higher than budget of \$4.2 million but lower than 2020 actuals of \$5.8 million. The notable components of Other revenues in 2021 are ordered costs, Ontario Report revenue, professional corporation fees and pre-authorized payment plan fees.

The favourable performance to budget is due to higher than budgeted ordered cost recoveries, professional corporations’ fees, mobility application fees and pre-authorized



payment plan fees. These increases were partially offset by catering revenues being under budget due to the continued closure of catering operations.

## **Expenses**

### ***Professional Regulation, Tribunals and Compliance***

Professional Regulation, Tribunals and Compliance expenses totalling \$22.8 million are in line with the 2020 amount of \$23.0 million and are less than budget by \$2.3 million. This is primarily due to staffing vacancies filled in the second and third quarters of 2021. Also, external counsel fees were lower than budget as the number of matters with external counsel continues to decline, and the continued impact of work at home protocols produced savings in travel, office, and document reproduction costs.

### ***Professional Development and Competence***

PD&C expenses totalling \$19.2 million are less than the 2020 amount of \$20.2 million and are less than budget by \$3.2 million. The 2021 budget assumed in-person licensing examinations but the decision by Convocation in February 2021 to maintain on-line examinations results in continued spending under budget. With this decision, investments are anticipated throughout the rest of the year to improve the infrastructure for longer term administration of online examinations. This will reduce some of the current variance between actual PD&C expenses and budget. Other reasons for lower expenses include staffing vacancies and reduced travel costs as audits and reviews continue to be performed remotely.

### ***Corporate Services***

Total Corporate Services expenses of \$19.7 million are less than the 2020 amount of \$20.8 million and less than budget by \$1.4 million. The key drivers for the difference between budget and actual are mainly related to lower security, cleaning and building operational costs with the continuation of work at home protocols. With the planned return of employees to the office in the last quarter of the year, in addition to the resumption of expenses related to building operations, costs will be incurred related to health and safety protocols, room configuration to support virtual meeting attendance, and information technology purchases to support hybrid work models.

### ***Convocation, Policy and Outreach***

Total Convocation, Policy and Outreach expenses of \$4.7 million are slightly higher than the 2020 amount of \$4.4 million but less than budget by \$3.4 million. The variance from budget relates to reduced expenses in the areas of benchers remuneration, expenses and functions, stakeholder engagement, the unused contingency, and underspending related to policy, media relations and communications.

### ***Services to Licensees and Public***

Services to licensees and public expenses are \$4.1 million compared to \$4.9 million in 2020 and are less than budget by \$700,000. The main reason for the lower spending when compared to prior year is due to the closure of the catering operation effective March 2020. The continued closure of the catering operations is also the reason for the lower spending compared to budget.

## **Statement of Financial Position**

### ***Cash & Short-Term Investments***

The total of cash and short-term investments at the end of the third quarter is \$76.2 million (2020 - \$64 million). Of this amount, \$17.9 million (2020 - \$19.2 million) pertains to the Compensation Fund and is held in separate accounts. The increase in cash and short-term investments over the prior year is attributable to 2021 reflecting the regular collection of licensee annual fees and pre-authorized payment ("PAP") plan amounts monthly that were deferred until August in 2020 because of the pandemic, with a greater amount collected over the balance of the year. This cash balance will continue to decrease over the year as the collection of annual fees is highest in the first quarter with spending throughout the year. The Law Society has sufficient working capital on hand to discharge its short- and medium-term obligations.

### ***Accounts Receivable***

Accounts receivable at the end of the third quarter is \$31.3 million (2020 - \$38.5 million). The reason for the higher accounts receivable balance in 2020 is primarily due to the relief measures provided to licensees in 2020, specifically, the delay of suspensions for non-payment of annual fees and the deferral of withdrawals related to the monthly PAP plan. Typically, the monthly payments would begin in March of the year and continue for 10 months, but in 2020, instalments under the PAP plan scheduled for April, May, June and July were deferred until August, with the outstanding balance collected over the balance of the year. Of the total accounts receivable balance at September 30, 2021,

approximately \$1.4 million relates to lawyer and paralegal licensees who are on the Annual Fee COVID-19 Deferral Option, deferring payment of 2021 annual fees to March 2022.

### ***Portfolio Investments***

Portfolio investments are shown at fair value of \$77.9 million (2020 - \$65.0 million) with the increase reflecting market conditions. The transition to a new investment manager was completed in September 2021, with realized gains on investments of \$5.7 million<sup>2</sup>. With this transition, the investment mix was also updated to incorporate foreign equities and an updated risk tolerance of each Fund. Of the total portfolio investments at the end of September, \$20.6 million pertains to the General Funds, \$34.2 million pertains to the Compensation Fund, and \$23.1 million pertains to the E&O Fund.

### ***Deferred Revenue***

Deferred revenue is made up of annual fees, licensing process revenues and insurance premiums which are recognized over the full year. The balance at the end of the third quarter of 2021 is \$50.6 million (2020 - \$50.3 million).

### ***Provision for Unpaid Grants Liability***

The provision for unpaid grants liability represents the estimate for unpaid grants and inquiries against the Compensation Fund, supplemented by the costs for processing these grants. The current balance of \$17.3 million has increased from \$15.7 million in 2020.

The main driver of the increase in the provision for unpaid grants liability has been the increased activity this quarter with some larger dollar value claims within the lawyer pool of the Compensation Fund. The paralegal Compensation Fund provision for unpaid grants comprises \$359,000 of the total Compensation Fund provision for unpaid grants.

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<sup>2</sup> It should be noted that the revenue associated with these realized gains has already been recognized in past quarters and years, as fluctuations in the fair value of investments are recorded each month. Changes recognized related to the fair value of investments in turn flow through to the fund balances.

# Appendix A

## General Fund & Restricted Fund

### General Fund

The General Fund accounts for the Society's program delivery and administrative activities related to the regulation and licensing of lawyers and paralegals. This fund reports unrestricted resources.

The Society's policy is to maintain the General Fund balance at no less than two and no more than three months of General Fund budgeted expenses.

If the General Fund balance exceeds three months of budgeted General Fund expenses, Convocation shall utilize the excess for one or more of the following:

- Mitigate the General Fund fee for the next fiscal year;
- Transfer the excess to another Society fund if the fund balance is below its stated policy benchmark.

If the General Fund balance is less than two months of budgeted General Fund expenses, Convocation shall budget for an annual surplus to restore the fund balance to its minimum policy objective. The minimum policy benchmark should be restored within three fiscal periods.

If the General Fund fund balance is more than two months of budgeted General Fund expenses and less than three months of budgeted General Fund expenses, Convocation may appropriate funds from the General Fund balance for one or more of the following:

- Mitigate the General Fund fee for the next fiscal year;
- Transfer the excess to another Society fund if the fund balance is below its stated policy benchmark.

### Restricted Funds

#### Compensation Fund

The Society maintains the Compensation Fund pursuant to section 51 of the Law

Society Act to relieve or mitigate loss sustained by any person in consequence of dishonesty on the part of a licensee, in connection with the licensee's professional business or in connection with any trust of which the licensee was a trustee. The Compensation Fund is restricted in use by the Law Society Act.

Pursuant to the Law Society Act, the Compensation Fund is supported by licensee annual fees, investment income and recoveries. The Compensation Fund accounts for program delivery, administration and payment of grants and has separate fund balances for lawyer licensees and paralegal licensees.

The Law Society's policy is to maintain the Lawyer Compensation Fund balance at an amount sufficient to provide for a minimum of one 97.5th percentile aggregate claim scenarios (one-in-forty-year event) and a maximum of four 99th percentile aggregate claim scenarios (one-in-one hundred-year event). The estimated amount of aggregate claims is to be actuarially reviewed at least every three years.

If the Lawyer Compensation Fund balance exceeds four one-in-one hundred-year events, Convocation shall utilize some or all of the excess for the following:

- Mitigation of the Lawyer Compensation Fund fee for the next fiscal year; or
- Annual mitigation of the Lawyer Compensation Fund fee shall continue such that within the next three fiscal years, the maximum benchmark shall be achieved.

If the Lawyer Compensation Fund balance is less than the minimum of one one-in-forty-year event, Convocation shall budget for an annual surplus to restore the fund balance to its minimum policy objective. The minimum policy benchmark should be restored within three fiscal periods.

If the Lawyer Compensation Fund balance is more than the minimum of one one-in-forty-year event and less than four one-in-one-hundred-year events Convocation may:

- Mitigate the Lawyer Compensation Fund levy for the next fiscal year;
- Budget for a surplus sufficient to increase the fund balance to its maximum policy objective of four one-in-one-hundred-year events;
- Leave the fund balance at its current balance for the upcoming fiscal year.

## **Errors and Omissions Insurance Fund**

The Errors and Omissions Insurance Fund (“E&O Fund”) accounts for insurance-related transactions between LAWPRO, the Society and insured lawyers. The E&O Fund collects premiums and levies from lawyers, reported as revenues, and remits these amounts to LAWPRO, reported as expenses.

Pursuant to section 61 of the Law Society Act, the Society arranges mandatory professional liability insurance for practising lawyers with LAWPRO, and through the E&O Fund, levies the insured lawyers. Each year, the premium for the insurance program is established through a process whereby LAWPRO provides an offer for review and acceptance by Convocation. The offer provides details on the components of the insurance program, including anticipated base premiums, claims history levies, transaction-based levies and amounts to be drawn from the E&O Fund balance.

## **Capital Allocation Fund**

The Capital Allocation Fund is maintained to provide a source of funds for the acquisition and maintenance of the Society’s capital and intangible assets which comprise buildings and major equipment including computers and software. Amounts of assets capitalized, according to the Society’s capital asset policy, are transferred to the Invested in Capital and Intangible Assets Fund. Expenditures not capitalized are expended in the Capital Allocation Fund.

## **Invested in Capital and Intangible Assets Fund**

The Invested in Capital and Intangible Assets Fund records transactions related to the Society’s capital assets and intangible assets, specifically acquisitions, amortization and disposals.

## **County Libraries Fund**

The County Libraries Fund records transactions related to the Society’s support of county law libraries. As approved by Convocation, the fund accumulates funds for county library purposes, which are remitted to LIRN.

## **Other Restricted Funds**

The Repayable Allowance Fund provides loans for tuition and living expenses to candidates in the lawyer licensing process.

The Special Projects Fund is maintained to ensure that financing is available for ongoing special projects approved by Convocation.

The Parental Leave Assistance Fund accounts for the delivery of the Parental Leave Assistance Program ("PLAP") and is funded by lawyers' fees. PLAP provides financial assistance to lawyers in firms of five lawyers or fewer who have a net annual practice income of less than \$50,000 and who do not have access to any other parental leave financial benefits. Under PLAP, the Society provides a fixed sum of \$750 a week to eligible applicants for up to 12 weeks to cover expenses associated with maintaining their practice during a maternity, parental or adoption leave.



## Statement of Financial Position

*Unaudited*

*Stated in thousands of dollars*

*As at September 30*

	2021	2020
<b>Assets</b>		
<b>Current Assets</b>		
Cash	60,394	36,250
Short-term investments	15,786	27,727
Accounts receivable	31,275	38,479
Prepaid expenses	29,762	30,233
<b>Total current assets</b>	<b>137,217</b>	<b>132,689</b>
Investment in subsidiaries	35,642	35,642
Portfolio investments	77,897	64,964
Loan receivable	1,692	1,436
Capital assets	6,414	7,238
Intangible assets	1,938	2,919
<b>Total Assets</b>	<b>260,800</b>	<b>244,888</b>
<b>Liabilities and Fund Balances</b>		
<b>Current Liabilities</b>		
Accounts payable and accrued liabilities	11,017	13,790
Deferred revenue	50,575	50,320
Due to LAWPRO	27,736	30,570
<b>Total current liabilities</b>	<b>89,328</b>	<b>94,680</b>
Provision for unpaid grants/claims	17,325	15,692
Unclaimed trust funds	6,655	5,837
Lease obligations	787	729
<b>Total Liabilities</b>	<b>114,095</b>	<b>116,938</b>
<b>Fund Balances</b>		
<b>General funds</b>		
Lawyers	36,442	26,781
Paralegals	2,680	1,935
<b>Restricted funds</b>		
Compensation - lawyers	32,737	28,276
Compensation - paralegals	929	922
Errors and omissions insurance	57,244	53,996
Capital allocation	7,038	4,763
Invested in capital and intangible assets	8,352	10,157
County libraries	89	96
Other	1,194	1,024
<b>Total Fund Balances</b>	<b>146,705</b>	<b>127,950</b>
<b>Total Liabilities and Fund Balances</b>	<b>260,800</b>	<b>244,888</b>



**Statement of Revenues and Expenses and Change in Fund Balances**
*Unaudited*
*Stated in thousands of dollars*
*For the nine months ended September 30*

	2021	2020	2021	2020	2021	2020	2021	2020
	General Fund Lawyer		General Fund Paralegal		Restricted Funds		Total	
<b>Revenues</b>								
Annual fees	52,075	50,482	4,181	4,110	11,439	16,697	67,695	71,289
Insurance premiums and levies	-	-	-	-	83,763	74,432	83,763	74,432
Professional development and competence	12,210	11,513	2,237	2,121	-	-	14,447	13,634
Investment income	415	488	53	62	1,010	1,114	1,478	1,664
Change in fair value of investments	1,183	(519)	150	(66)	3,763	(2,052)	5,096	(2,637)
Other	4,488	4,850	594	959	35	367	5,117	6,176
<b>Total revenues</b>	<b>70,371</b>	<b>66,814</b>	<b>7,215</b>	<b>7,186</b>	<b>100,010</b>	<b>90,558</b>	<b>177,596</b>	<b>164,558</b>
<b>Expenses</b>								
Professional regulation, tribunals and compliance	21,548	21,075	1,259	1,910	-	-	22,807	22,985
Professional development and competence	17,096	18,152	2,153	2,042	-	-	19,249	20,194
Corporate services	17,512	18,506	2,168	2,285	-	-	19,680	20,791
Convocation, policy and outreach	4,230	4,011	430	399	-	-	4,660	4,410
Services to licensees and public	3,778	4,474	357	449	-	-	4,135	4,923
Restricted	-	-	-	-	96,500	84,416	96,500	84,416
<b>Total expenses</b>	<b>64,164</b>	<b>66,218</b>	<b>6,367</b>	<b>7,085</b>	<b>96,500</b>	<b>84,416</b>	<b>167,031</b>	<b>157,719</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>6,207</b>	<b>596</b>	<b>848</b>	<b>101</b>	<b>3,510</b>	<b>6,142</b>	<b>10,565</b>	<b>6,839</b>
<b>Fund balances, beginning of year</b>	<b>30,301</b>	<b>26,106</b>	<b>1,832</b>	<b>1,834</b>	<b>104,007</b>	<b>93,171</b>	<b>136,140</b>	<b>121,111</b>
<b>Interfund transfers</b>	<b>(66)</b>	<b>79</b>	<b>-</b>	<b>-</b>	<b>66</b>	<b>(79)</b>	<b>-</b>	<b>-</b>
<b>Fund balances, end of period</b>	<b>36,442</b>	<b>26,781</b>	<b>2,680</b>	<b>1,935</b>	<b>107,583</b>	<b>99,234</b>	<b>146,705</b>	<b>127,950</b>

## Schedule of Restricted Funds

Unaudited

Stated in thousands of dollars

For the nine months ended September 30

	2021						2020		
	Compensation Fund		Errors and omissions insurance	Capital allocation	Invested in capital and intangible assets	County libraries	Other restricted	Total	Total
Lawyer	Paralegal								
<b>Fund balances, beginning of year</b>	<b>30,543</b>	<b>959</b>	<b>55,386</b>	<b>5,458</b>	<b>10,548</b>	<b>85</b>	<b>1,028</b>	<b>104,007</b>	93,171
<b>Revenues</b>									
Annual fees	2,932	5	-	2,835	-	5,417	250	11,439	16,697
Insurance premiums and levies	-	-	83,763	-	-	-	-	83,763	74,432
Investment income	643	34	333	-	-	-	-	1,010	1,114
Change in fair value of investments	2,126	112	1,525	-	-	-	-	3,763	(2,052)
Other	33	2	-	-	-	-	-	35	367
<b>Total revenues</b>	<b>5,734</b>	<b>153</b>	<b>85,621</b>	<b>2,835</b>	<b>-</b>	<b>5,417</b>	<b>250</b>	<b>100,010</b>	90,558
<b>Total expenses</b>	<b>3,540</b>	<b>183</b>	<b>83,763</b>	<b>1,271</b>	<b>2,196</b>	<b>5,413</b>	<b>134</b>	<b>96,500</b>	84,416
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>2,194</b>	<b>(30)</b>	<b>1,858</b>	<b>1,564</b>	<b>(2,196)</b>	<b>4</b>	<b>116</b>	<b>3,510</b>	6,142
<b>Interfund transfers</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>16</b>	<b>-</b>	<b>-</b>	<b>50</b>	<b>66</b>	(79)
<b>Fund balances, end of period</b>	<b>32,737</b>	<b>929</b>	<b>57,244</b>	<b>7,038</b>	<b>8,352</b>	<b>89</b>	<b>1,194</b>	<b>107,583</b>	99,234



**Lawyers and Paralegals General Fund  
Schedule of Revenues and Expenses**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	<b>2021 Budget YTD</b>	<b>Variance</b>	<b>2020 Actual</b>
<b>REVENUES</b>				
Annual fees	56,256	55,286	970	54,592
Professional development and competence	14,447	13,262	1,185	13,634
Investment income	468	582	(114)	550
Change in fair value of investments	1,333	-	1,333	(585)
Other	5,082	4,189	893	5,809
<b>Total revenues</b>	<b>77,586</b>	<b>73,319</b>	<b>4,267</b>	<b>74,000</b>
<b>EXPENSES</b>				
Professional regulation, tribunals and compliance	22,807	25,135	2,328	22,985
Professional development and competence	19,249	22,425	3,176	20,194
Corporate services	19,680	21,044	1,364	20,791
Convocation, policy and outreach	4,660	8,026	3,366	4,410
Services to licensees and public	4,135	4,835	700	4,923
<b>Total expenses</b>	<b>70,531</b>	<b>81,465</b>	<b>10,934</b>	<b>73,303</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>7,055</b>	<b>(8,146)</b>	<b>15,201</b>	<b>697</b>



**General Fund - Lawyers**  
**Schedule of Revenues and Expenses**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	<b>2021 Budget YTD</b>	<b>Variance</b>	<b>2020 Actual</b>
<b>REVENUES</b>				
Annual fees	52,075	51,164	911	50,482
Professional development and competence	12,210	11,423	787	11,513
Investment income	415	510	(95)	488
Change in fair value of investments	1,183	-	1,183	(519)
Other	4,488	3,702	786	4,850
<b>Total revenues</b>	<b>70,371</b>	<b>66,799</b>	<b>3,572</b>	<b>66,814</b>
<b>EXPENSES</b>				
Professional regulation, tribunals and compliance	21,548	23,768	2,220	21,075
Professional development and competence	17,096	19,860	2,764	18,152
Corporate services	17,512	18,731	1,219	18,506
Convocation, policy and outreach	4,230	7,212	2,982	4,011
Services to licensees and public	3,778	4,297	519	4,474
<b>Total expenses</b>	<b>64,164</b>	<b>73,868</b>	<b>9,704</b>	<b>66,218</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>6,207</b>	<b>(7,069)</b>	<b>13,276</b>	<b>596</b>



**General Fund - Paralegals**  
**Schedule of Revenues and Expenses**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	<b>2021 Budget YTD</b>	<b>Variance</b>	<b>2020 Actual</b>
<b>REVENUES</b>				
Annual fees	4,181	4,122	59	4,110
Professional development and competence	2,237	1,839	398	2,121
Investment income	53	72	(19)	62
Change in fair value of investments	150	-	150	(66)
Other	594	487	107	959
<b>Total revenues</b>	<b>7,215</b>	<b>6,520</b>	<b>695</b>	<b>7,186</b>
<b>EXPENSES</b>				
Professional regulation, tribunals and compliance	1,259	1,367	108	1,910
Professional development and competence	2,153	2,565	412	2,042
Corporate services	2,168	2,313	145	2,285
Convocation, policy and outreach	430	814	384	399
Services to licensees and public	357	538	181	449
<b>Total expenses</b>	<b>6,367</b>	<b>7,597</b>	<b>1,230</b>	<b>7,085</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>848</b>	<b>(1,077)</b>	<b>1,925</b>	<b>101</b>



**Lawyers and Paralegals Compensation Fund  
Schedule of Revenues and Expenses**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	<b>2021 Budget YTD</b>	<b>Variance</b>	<b>2020 Actual</b>
<b>REVENUES</b>				
Annual fees	2,937	2,887	50	7,192
Investment income	677	749	(72)	732
Change in fair value of investments	2,238	-	2,238	(1,221)
Recoveries	35	262	(227)	367
<b>Total revenues</b>	<b>5,887</b>	<b>3,898</b>	<b>1,989</b>	<b>7,070</b>
<b>EXPENSES</b>				
Provision for unpaid grants	3,229	3,454	225	117
Administrative	494	573	79	521
<b>Total expenses</b>	<b>3,723</b>	<b>4,027</b>	<b>304</b>	<b>638</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>2,164</b>	<b>(129)</b>	<b>2,293</b>	<b>6,432</b>



**Compensation Fund - Lawyers**  
**Schedule of Revenues and Expenses**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	<b>2021 Budget YTD</b>	<b>Variance</b>	<b>2020 Actual</b>
<b>REVENUES</b>				
Annual fees	2,932	2,882	50	7,132
Investment income	643	712	(69)	695
Change in fair value of investments	2,126	-	2,126	(1,160)
Recoveries	33	249	(216)	324
<b>Total revenues</b>	<b>5,734</b>	<b>3,843</b>	<b>1,891</b>	<b>6,991</b>
<b>EXPENSES</b>				
Provision for unpaid grants	3,071	3,367	296	31
Administrative	469	545	76	502
<b>Total expenses</b>	<b>3,540</b>	<b>3,912</b>	<b>372</b>	<b>533</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>2,194</b>	<b>(69)</b>	<b>2,263</b>	<b>6,458</b>



**Compensation Fund - Paralegals  
Schedule of Revenues and Expenses**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	<b>2021 Budget YTD</b>	<b>Variance</b>	<b>2020 Actual</b>
<b>REVENUES</b>				
Annual fees	5	5	-	60
Investment income	34	37	(3)	37
Change in fair value of investments	112	-	112	(61)
Recoveries	2	13	(11)	43
<b>Total revenues</b>	<b>153</b>	<b>55</b>	<b>98</b>	<b>79</b>
<b>EXPENSES</b>				
Provision for unpaid grants	158	87	(71)	86
Administrative	25	28	3	19
<b>Total expenses</b>	<b>183</b>	<b>115</b>	<b>(68)</b>	<b>105</b>
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>(30)</b>	<b>(60)</b>	<b>30</b>	<b>(26)</b>





**Compensation Fund**  
**Statement of Financial Position**

*Unaudited*

*Stated in thousands of dollars As  
at September 30*

	2021	2020
<b>Assets</b>		
<b>Current Assets</b>		
Cash	17,891	18,359
Short-term investments	-	862
<b>Total Current Assets</b>	<b>17,891</b>	19,221
Portfolio investments	<b>34,276</b>	28,462
<b>Total Assets</b>	<b>52,167</b>	47,683
<b>Liabilities and Fund Balance</b>		
<b>Current Liabilities</b>		
Accounts payable and accrued liabilities	138	257
Deferred revenue	999	2,441
Due to General Fund	39	95
<b>Total Current Liabilities</b>	<b>1,176</b>	2,793
Provision for unpaid grants/claims - lawyers	<b>16,966</b>	15,507
Provision for unpaid grants/claims - paralegals	<b>359</b>	185
<b>Total Liabilities</b>	<b>18,501</b>	18,485
Fund balance - lawyers	<b>32,737</b>	28,276
Fund balance - paralegals	<b>929</b>	922
<b>Total Fund Balance</b>	<b>33,666</b>	29,198
<b>Total Liabilities and Fund Balance</b>	<b>52,167</b>	47,683



**Errors & Omissions Insurance Fund**  
**Statement of Financial Position**

*Unaudited*

*Stated in thousands of dollars As  
at September 30*

	2021	2020
<b>Assets</b>		
<b>Current Assets</b>		
Cash	181	132
Short-term investments	-	588
Accounts receivable	19,063	21,070
Prepaid E&O premiums incurred	28,962	29,161
<b>Total Current Assets</b>	<b>48,206</b>	50,951
<b>Investment in subsidiary</b>	<b>35,642</b>	35,642
<b>Portfolio investments</b>	<b>23,064</b>	19,409
<b>Total Assets</b>	<b>106,912</b>	106,002
<b>Liabilities and Fund Balance</b>		
<b>Current Liabilities</b>		
Due to LAWPRO	27,866	30,641
Unearned E&O premiums recovered	21,802	21,365
<b>Total Current Liabilities</b>	<b>49,668</b>	52,006
<b>Fund Balance</b>	<b>57,244</b>	53,996
<b>Total Liabilities and Fund Balance</b>	<b>106,912</b>	106,002



**Errors and Omissions Insurance Fund**  
**Schedule of Revenues and Expenses and Change in Fund Balance**

*Unaudited*

*Stated in thousands of dollars*

*For the nine months ended September 30*

	<b>2021 Actual</b>	2020 Actual
<b>REVENUES</b>		
Insurance premiums and levies	<b>83,763</b>	74,432
Investment income	<b>333</b>	382
Change in fair value of investments	<b>1,525</b>	(831)
<b>Total revenues</b>	<b>85,621</b>	73,983
<b>EXPENSES</b>		
Insurance	<b>83,763</b>	74,432
<b>Total expenses</b>	<b>83,763</b>	74,432
<b>Excess of revenues over expenses (expenses over revenues)</b>	<b>1,858</b>	(449)
Interfund transfers	-	-
Change in fund balance	<b>1,858</b>	(449)
Fund balance, beginning of year	<b>55,386</b>	54,445
Fund balance, end of period	<b>57,244</b>	53,996

# **Investment Compliance Reports for the Quarter ended September 30, 2021**

**The Committee recommends the Investment Compliance Reports for the quarter ended September 30, 2021 be received by Convocation for information.**

Under the Law Society Investment Policy, Law Society management shall report periodically on compliance with the Policy.

The Law Society completed the transition to its new investment manager, Connor, Clark & Lunn Financial Group (“CC&L”) in September 2021. As a result, there are two sets of compliance reports for this quarter. The investment compliance reporting from Foyston, Gordon & Payne Inc. reflects compliance with the investment policy dated April 26, 2018 and is for the period of July 1, 2021 to September 22, 2021. The investment compliance reporting from CC&L reflects compliance with the Investment Policy that was approved by Convocation this year. The compliance reporting from CC&L reflects the period of September 27, 2021 to September 30, 2021.

The Law Society and its investment managers have complied with the Investment Policy for the quarter ending September 30, 2021.

**LAW SOCIETY OF ONTARIO  
STATEMENT OF INVESTMENT COMPLIANCE  
SHORT-TERM INVESTMENTS  
As at September 30, 2021**

<b>Short-Term Investment Parameters</b>	<b>Guidelines</b>	<b>Compliance</b>
<b>Allowable Investments</b>		
Treasury bills issued by the Government of Canada, Provincial governments, and their agencies	Allowed	Yes
Bankers acceptances	Allowed	Yes
Commercial paper issued by Canadian corporations with a rating of "R1 low" or better as established by The Dominion Bond Rating service or equivalent rating	Allowed	Yes
Pooled Money Market Fund	Allowed	Yes
<b>Concentration Tests</b>		
Securities of any one single issuer	Maximum 10% of each portfolio	Yes
Maximum term to maturity	1 year	Yes

*Christianne Abou-Saab*

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Christianne Abou-Saab  
Director, Finance

**Law Society of Ontario  
General Fund  
Manager: Foyston, Gordon & Payne Inc.  
Compliance Report  
(Period ending September 22, 2021)**

1. Asset Mix:	Min.	Mid-Point	Max.	Compliance* (Y/N)
Cash & Short Term	0%	0%	15%	Y
Bonds	45%	70%	80%	Y
<b>Total Fixed Income</b>	<b>60%</b>	<b>70%</b>	<b>80%</b>	<b>Y</b>
<b>Canadian Equity</b>	<b>20%</b>	<b>30%</b>	<b>40%</b>	<b>Y</b>
<b>Minimum bond rating "BBB" or better by the Dominion Bond Rating Service or equivalent rating by another recognized bond rating service.</b>				<b>Y</b>
<b>Each bond portfolio may be invested within the following parameters:</b>				
Bond Holdings	Asset Mix			
	Maximum	Target	Minimum	Compliance* (Y/N)
Federal and Federally Guaranteed Bonds	100%	46%	26%	Y
Provincials, Provincially Guarantees and Municipals	38%	18%	0%	Y
Total Corporate Issues	56%	36%	0%	Y
Total BBB Issues with Corporate Issues	18%	8%	0%	Y
Cash or Money Market	5%	0%	0%	Y
Investment in any one security or issuer shall not exceed 10% of each Bond portfolio with the exception of those guaranteed by the Government of Canada and/or a provincial government.				Y
Bond portfolio duration 1 to 5 years.				Y
The Market value of any one common equity issuer cannot represent more than 10% of the market value of the total portfolio, or that equity's weight in the S&P/TSX Composite Index, whichever is greater.				Y

Investment policy dated February 23, 2017. \*If policy not complied with, comment on specifics.

*Susan Eapen*

October 29, 2021

Susan Eapen  
Chief Compliance Officer

Date

**Law Society of Ontario  
Compensation Fund  
Manager: Foyston, Gordon & Payne Inc.  
Compliance Report  
(Period ending September 22, 2021)**

1. Asset Mix:	Min.	Mid-Point	Max.	Compliance* (Y/N)
Cash & Short Term	0%	0%	15%	Y
Bonds	45%	70%	80%	Y
<b>Total Fixed Income</b>	<b>60%</b>	<b>70%</b>	<b>80%</b>	<b>Y</b>
<b>Canadian Equity</b>	<b>20%</b>	<b>30%</b>	<b>40%</b>	<b>Y</b>
<b>Minimum bond rating "BBB" or better by the Dominion Bond Rating Service or equivalent rating by another recognized bond rating service.</b>				<b>Y</b>
<b>Each bond portfolio may be invested within the following parameters:</b>				
Bond Holdings	Asset Mix			
	Maximum	Target	Minimum	Compliance* (Y/N)
Federal and Federally Guaranteed Bonds	100%	46%	26%	Y
Provincials, Provincially Guarantees and Municipals	38%	18%	0%	Y
Total Corporate Issues	56%	36%	0%	Y
Total BBB Issues with Corporate Issues	18%	8%	0%	Y
Cash or Money Market	5%	0%	0%	Y
Investment in any one security or issuer shall not exceed 10% of each Bond portfolio with the exception of those guaranteed by the Government of Canada and/or a provincial government.				Y
Bond portfolio duration 1 to 5 years.				Y
The Market value of any one common equity issuer cannot represent more than 10% of the market value of the total portfolio, or that equity's weight in the S&P/TSX Composite Index, whichever is greater.				Y

Investment policy dated February 23, 2017. \*If policy not complied with, comment on specifics.

*Susan Eapen*

Susan Eapen  
Chief Compliance Officer

October 29, 2021

Date

# E&O Insurance Fund

Manager: Foyston, Gordon & Payne Inc.

## Compliance Report

(Period ending September 22, 2021)

1. Asset Mix:	Min.	Mid-Point	Max.	Compliance* (Y/N)
Cash & Short Term	0%	0%	15%	Y
Bonds	45%	70%	80%	Y
<b>Total Fixed Income</b>	<b>60%</b>	<b>70%</b>	<b>80%</b>	<b>Y</b>
<b>Canadian Equity</b>	<b>20%</b>	<b>30%</b>	<b>40%</b>	<b>Y</b>
Minimum bond rating "BBB" or better by the Dominion Bond Rating Service or equivalent rating by another recognized bond rating service.				Y
Each bond portfolio may be invested within the following parameters:				
Bond Holdings	Asset Mix			
	Maximum	Target	Minimum	Compliance* (Y/N)
Federal and Federally Guaranteed Bonds	100%	46%	26%	Y
Provincials, Provincially Guarantees and Municipals	38%	18%	0%	Y
Total Corporate Issues	56%	36%	0%	Y
Total BBB Issues with Corporate Issues	18%	8%	0%	Y
Cash or Money Market	5%	0%	0%	Y
Investment in any one security or issuer shall not exceed 10% of each Bond portfolio with the exception of those guaranteed by the Government of Canada and/or a provincial government.				Y
Bond portfolio duration 1 to 5 years.				Y
The Market value of any one common equity issuer cannot represent more than 10% of the market value of the total portfolio, or that equity's weight in the S&P/TSX Composite Index, whichever is greater.				Y

Investment policy dated February 23, 2017.

\*If policy not complied with, comment on specifics



Susan Eapen  
Chief Compliance Officer

October 20, 2021

Date



All percentages set out below are based on market values except if noted otherwise.

### Law Society of Ontario

Concentration Tests	Guidelines	Actual	Compliance
<b>Cash</b>			
Cash as a % of each bond portfolio (excluding any cash designated to collateralize derivatives exposure)	25.0 %	7.1 %	Yes
<b>Fixed Income</b>			
Single corporate issuer (excluding Schedule 1 Banks) as a % of each bond portfolio	10.0 %	4.8 %	Yes
Government of Canada and guaranteed bonds as a % of each bond portfolio	100.0 %	91.3 %	Yes
Provincial securities as a % of each bond portfolio	80.0 %	10.1 %	Yes
Municipal securities as a % of each bond portfolio	10.0 %	0.0 %	Yes
Non-government securities as a % of each bond portfolio	70.0 %	28.3 %	Yes
Mortgage-backed securities as a % of each bond portfolio	25.0 % max	0.0 %	Yes
Asset-backed securities as a % of each bond portfolio	25.0 % max	0.0 %	Yes
Corporate bonds as a % of each bond portfolio	65.0 % max	28.3 %	Yes
Corporate bonds with a BBB credit rating as a % of each bond portfolio	20.0 % max	11.6 %	Yes
Single corporate issuer (excluding Schedule 1 Banks) as a % of each bond portfolio	10.0 % max	2.5 %	Yes
Duration of each bond portfolio	1.0 yrs to 5.0 yrs	2.8 yrs	Yes
<b>Equities</b>			
Securities of a single issuer for the global equity portfolio will not exceed the greater of 10% of the market value of the total global equity portfolio or that equity's weight in the MSCI World Index			Yes
Securities of a single issuer for the Canadian equity portfolio will not exceed the greater of 10% of the market value of the total Canadian equity portfolio or that equity's weight in the S&P/TSX Capped Composite Index			Yes
<b>Total Portfolio</b>			
Leverage is prohibited			Yes
<b>Exclusion Tests</b>			<b>Compliance</b>
<b>Cash</b>			
Maximum effective term to maturity of Floating Rate Notes cannot exceed 3 months			Yes
Maximum term to maturity of short term securities (excl FRNS) cannot exceed 1 year			Yes
Cash securities must have a minimum R1-Low credit rating at time of purchase			Yes
<b>Fixed Income</b>			
Minimum BBB- credit rating allowed			Yes
Minimum P2 preferred share rating allowed			Yes

All percentages set out below are based on market values except if noted otherwise.

**Law Society of Ontario (General Fund)**

<b>Concentration Tests</b>	<b>Min</b>	<b>Target</b>	<b>Max</b>	<b>Actual</b>	<b>Compliance</b>
<b>Asset Mix</b>					
Fixed income as a % of the total portfolio	40.0 %	50.0%	60.0 %	50.2 %	Yes
Total Equities as a % of the total portfolio	40.0 %	50.0%	60.0 %	49.8 %	Yes
NS Partners Global Equity Fund as a % of the total portfolio	23.0 %	33.0%	43.0 %	32.8 %	Yes
CC&L Canadian Equity Fund as a % of the total portfolio	7.0 %	17.0%	27.0 %	17.0 %	Yes
CC&L Group Money Market Fund as a % of the total portfolio	0.0 %	0.0%	15.0 %	0.0 %	Yes
CC&L Short Term Bond Fund as a % of the total portfolio	35.0 %	50.0%	60.0 %	50.2 %	Yes

All percentages set out below are based on market values except if noted otherwise.

**Law Society of Ontario (Compensation Fund)**

<b>Concentration Tests</b>	<b>Min</b>	<b>Target</b>	<b>Max</b>	<b>Actual</b>	<b>Compliance</b>
<b>Asset Mix</b>					
Fixed income as a % of the total portfolio	55.0 %	65.0%	75.0 %	65.2 %	Yes
Total Equities as a % of the total portfolio	25.0 %	35.0%	45.0 %	34.8 %	Yes
NS Partners Global Equity Fund as a % of the total portfolio	13.0 %	23.0%	33.0 %	22.8 %	Yes
CC&L Canadian Equity Fund as a % of the total portfolio	2.0 %	12.0%	22.0 %	12.0 %	Yes
CC&L Group Money Market Fund as a % of the total portfolio	0.0 %	0.0%	15.0 %	0.0 %	Yes
CC&L Short Term Bond Fund as a % of the total portfolio	50.0 %	65.0%	75.0 %	65.2 %	Yes

All percentages set out below are based on market values except if noted otherwise.

**Law Society of Ontario (Errors & Omissions)**

<b>Concentration Tests</b>	<b>Min</b>	<b>Target</b>	<b>Max</b>	<b>Actual</b>	<b>Compliance</b>
<b>Asset Mix</b>					
Fixed income as a % of the total portfolio	60.0 %	70.0%	80.0 %	70.2 %	Yes
Total Equities as a % of the total portfolio	20.0 %	30.0%	40.0 %	29.8 %	Yes
NS Partners Global Equity Fund as a % of the total portfolio	10.0 %	20.0%	30.0 %	19.8 %	Yes
CC&L Canadian Equity Fund as a % of the total portfolio	0.0 %	10.0%	20.0 %	10.0 %	Yes
CC&L Group Money Market Fund as a % of the total portfolio	0.0 %	0.0%	15.0 %	0.0 %	Yes
CC&L Short Term Bond Fund as a % of the total portfolio	55.0 %	70.0%	80.0 %	70.2 %	Yes