

If you require this information in an alternate format, please contact the Accessibility Coordinator at accessibility@northumberland.ca or 1-800-354-7050 ext. 2327



Report 2021-160

Report Title: In-house Legal Counsel

Committee Name: Finance and Audit

Committee Meeting Date: October 5, 2021

Prepared by: Glenn Dees
Director of Finance / Treasurer
Finance

Reviewed by: Lisa Ainsworth, Director Corporate Services
Corporate Services

Randy Horne, Manager Court Services
Finance

Approved by: Jennifer Moore, CAO

Council Meeting Date: October 20, 2021

Strategic Plan Priorities: ☐ Economic Prosperity and Innovation
☒ Sustainable Growth
☐ Thriving and Inclusive Communities
☒ Leadership in Change

Recommendation

“That the Finance and Audit Committee, having considered Report 2021-160 ‘In-house Legal Counsel’, receive the report for information, noting that legal expenditures for the County have increased to the extent that cost savings could be realized if the County had on staff an In-house Solicitor, and that the County, under a Memorandum of Understanding with the Ministry of the Attorney General for providing Provincial Offences services, must ensure that any Prosecutors who are not Lawyers are supervised by or report to a Lawyer; and

Further That the Committee recommend that County Council approve the addition of an In-house Solicitor and a Paralegal/Prosecutor to the organizational chart to realize net cost

savings, enhanced risk management and business continuity and ensure compliance with the Memorandum of Understanding with the Ministry of the Attorney General.”

Purpose

The intent of this report is to acquire approval for the addition of an In-house Solicitor and a Paralegal/Prosecutor to the County organizational chart. This is anticipated to result in overall cost savings as identified within the Service Delivery Review (SDR) prepared by StrategyCorp and based upon further staff review and analysis. Having on staff an In-house Solicitor would meet the requirement under the Provincial Offences Act (POA) Memorandum of Understanding (MOU) between the County and the Ministry of the Attorney General (MAG) to ensure that County Prosecutors are supervised by or report to a Lawyer. An In-house Solicitor would provide legal analysis and strategic advice to County staff and County Council, enhance risk management, carry out general legal matters and be the liaison with external specialized law firms ensuring costs are minimized and risks are mitigated as legal representation for the County.

Background

StrategyCorp was awarded a contract to complete a SDR of various County operations for departmental resourcing, a review of existing shared services and, secondarily, a review for service delivery or process improvement opportunities. The review was completed utilizing funding from the Municipal Modernization Program. Recommendations brought forward as a result of the Service Delivery Report by StrategyCorp were classified under four categories:

- Value for Money;
- Operational Sustainability;
- Fairness; and
- Improving Services.

Internal staffing resources review recommendations were assessed against six evaluative criteria:

- Implementation Cost;
- Financial Benefit;
- Value for Money;
- Service Level Impact;
- Risks and Sensitivities; and
- Implementation Considerations.

Within the Finance Department, both Court Services/POA and Purchasing and Risk Management Services were within scope of the SDR resulting in two recommendations from StrategyCorp in respect to staffing resources. StrategyCorp recognized in the SDR that the Finance Department has experienced an increase in demand for services across its four divisions (Court Services/POA, Accounting Services, Financial Planning Services and Purchasing and Risk Management Services) and through the adoption of Lean principles and through a series of investments in technology, has addressed some gaps in capacity and efficiency to meet current and future service level expectations.

The first recommendation from the SDR was to redeploy an existing administrative vacancy in Court Services/POA to Purchasing and Risk Management Services which has been completed. This recommendation addresses identified capacity gaps in the division and supports meeting projected future demands for service by repurposing the existing vacancy in Court Services/POA at no additional cost to the County. This also creates additional capacity to provide formalized shared procurement services to member municipalities through managed service agreements that are currently under review. The County and interested member municipalities are in the process of harmonizing applicable purchasing policies and by-laws to further support this important initiative and increase opportunities for joint purchasing in the future. Adoption of recent technologies within Purchasing and Risk Management Services will provide the technological framework to facilitate automated workflow management for shared services delivery with those interested member municipalities.

The second recommendation was to bring legal services in-house through a County Barrister and Solicitor to realize cost savings, address future demands for municipal prosecutorial responsibilities within Court Services/POA, support business continuity and succession planning, and provide supervision and mentorship to municipal prosecution staff such that it is fully separated from the oversight of Court Services/POA administration.

Within Northumberland County approximately 15,000-18,000 charges are filed per annum under various legislation such as the Highway Traffic Act, Cannabis Control Act, Compulsory Automobile Insurance Act, Liquor License Act and Environmental Protection Act. Pursuant to the MOU with MAG, the County, under its jurisdiction, conducts prosecutions and appeals in the Ontario Court of Justice for Part I Provincial Offences Act matters. Prosecutorial activities include case preparation, disclosures, trials, and resolution meetings.

Under the MOU, the County is required to ensure that prosecutions are conducted in a manner consistent with the following principles:

- prosecutorial independence,
- fairness and impartiality,
- competence and integrity, and
- timeliness of prosecutions.

Prosecution standards under the MOU are meant to ensure that a separation between POA prosecution and POA administration functions is maintained at all times. As such, the County must ensure that any Prosecutors who are not Lawyers are supervised by or report to a Lawyer. Reporting relationships for all Prosecutors must be structured to ensure that the Prosecutors' exercise of discretion is not influenced by any person or body, including members of Council, policing and other enforcement agencies and municipal officers. Currently, the Paralegal carrying out prosecutorial activities reports to the Court Services Manager and the contract Prosecutor/Solicitor acts as the supervising solicitor for prosecutorial matters; therefore, there is not a clear delineation between prosecutorial and administrative functions within Court Services/POA nor a reporting relationship that fully ensures that the Paralegal/Prosecutors' exercise of discretion is not influenced.

As recognized in the SDR, the Court Services Division is preparing for the download of Part III Offenses that are currently administered by the Provincial Crown Attorney to municipalities responsible for POA. The County is currently responsible for prosecution of Part I offenses, such

as speeding or careless driving, which are minor non-criminal offenses where tickets can be issued. Early Resolution legislation provides persons charged with minor offences under Part I (or Part II) of the POA with an option to meet with the Prosecutor to resolve matters without the necessity of a trial proceeding. Part III offenses include more serious offenses under various acts, primarily the Highway Traffic Act, such as stunt driving and street racing, as well as more serious bylaw offenses. To prepare for the new administrative and prosecutorial responsibilities of Part III offenses, StrategyCorp noted that the County has addressed the following:

- Administration and collections: invested in enhanced Court Administration Management Systems (CAMS) technology. The enhanced implementation of CAMS has realized efficiencies in the delivery of collections and administrative services. In addition, a County led Lean process redeployed the functions associated with an unexpected vacant FTE in the POA Collections Services area.
- Increased prosecutorial capacity: To address increased prosecutorial responsibilities, the County approved a new Paralegal position in 2019. This position has been filled on a secondment basis recognizing the significant changes that have occurred in POA and other impending legislated changes. In addition to the increased volume of work, the County faces succession planning, and risks to business continuity as the current external contracted Prosecutor/Solicitor is set to retire in the near future.

As a result of the COVID-19 pandemic, much of the processes in Court Services have changed and are very much in a state of flux. Further to this, possible legislated changes included in Bill 177 Stronger Fairer Ontario Act aimed at modernizing and streamlining POA court processes may impact responsibilities related to Early Resolution resulting in additional processes. County Council endorsed a report “Municipal Court Managers’ Association / POA Advocacy” recommending the Attorney General to:

- halt the proclamation of the Early Resolution reforms included in Bill 177,
- enact changes to the Provincial Offences Act and any related regulations to permit the Prosecutor and defendant or legal representative to agree, at any stage of a proceeding, to a resolution in writing for proceedings commenced under Part I or Part II of the POA and to permit the Clerk of the Court to register the court outcome immediately upon receipt of the written agreement without requiring an appearance before a Justice of the Peace, and
- consider suspending (temporarily) the imposition of demerit points for persons who pay their ticket in cases where they have no previous relevant convictions.

Although the Early Resolution reforms have not yet been proclaimed, effective November 1, 2021, a proclamation of POA Clerk amendments will come into effect which will provide greater powers to Clerks of the Court. Primarily, Clerks of the Court will have the ability to grant, but not deny, an extension of time to pay a fine. Also, the ability to enter a conviction and impose a set fine where a defendant has failed to respond to the ticket and is deemed not to dispute. These amendments are meant to assist municipalities in recovering from the disruption of court operations created by the pandemic by freeing up Provincial judicial time and allowing municipal court staff to address the backlog of cases more quickly. Greater emphasis and responsibilities will be placed upon POA resources, both prosecutorial and administrative, and is reflective of the ongoing changes occurring in POA as noted above.

Consultations

StrategyCorp, as an external third party, were contracted through a competitive RFP process to complete the SDR inclusive of Court Services/POA reviewing staffing resources and opportunities for efficiencies and cost savings. Interviews by StrategyCorp were facilitated with County Councilors and staff.

Discussions were held with one of the law firms the County utilizes seeking input on benefits, opportunities, and risks under various options.

Internal consultations based on findings have been facilitated with leadership of all County Departments. Dialogue included not only the quantitative justification for having an In-house Solicitor but also the qualitative benefits this would afford the County particularly addressing lack of internal legal expertise in consideration of risk management and mitigation.

Legislative Authority / Risk Considerations

The County is required to meet all requirements of an MOU with MAG. Schedule I Standards for Prosecutions by Municipalities per the MOU requires the County Court Services to act under the supervision of a Lawyer or Corporate Solicitor. A distinct separation of administrative and prosecutorial functions within Court Services/POA must be adhered to such that full prosecutorial independence is maintained. Reporting relationships for all Prosecutors must be structured to ensure that the Prosecutors' exercise of discretion is not influenced by any person or body.

Discussion / Options

Currently, Court Services has one contract Prosecutor/Solicitor and one Paralegal/Prosecutor position as approved on the County organization chart. The Paralegal/Prosecutor role reports to the Court Services Manager. The contract Prosecutor is also a Solicitor and, as such, fulfills the need to have a POA supervising solicitor under the MOU with MAG. With the current reporting structure, the need to maintain separation between prosecutorial and administrative functions ensuring no influence on Prosecutors' exercise of judgement under the MOU is not fully realized. The contract Prosecutor/Solicitor is scheduled to retire likely over the next year or two which will result in no longer having in place the required supervision of prosecutorial activities by a Solicitor.

The completion of the download of Part III offenses from MAG to the County will increase the need for prosecutorial services. Details, timelines, and processes for finalizing the download have yet to be confirmed by the current government and have been stalled as a result of the ongoing COVID-19 pandemic. The County undertook a detailed assessment of projected future demand and the adjustments that would be required to meet it. Based on the analysis by StrategyCorp at publishing of the SDR the following was some of the highlights noted regarding projected future demands:

- When the Province structures the download for Part III POA offenses, the County can expect a significant increase in the Municipal prosecution workload in relation to case preparation, disclosure, resolution meetings, and court time required.
- Since 2016, Northumberland County has experienced a 67% increase in Part III charges as a proportion of the total number of charges laid. In 2016, Part III charges accounted

for 5.4% of the total charges laid (737/13,752) and by 2020 (up to August 30th), Part III charges accounted for 9% of the total charges laid (660/7327).

- Northumberland County has been at considerable business continuity risk with only one Municipal Prosecutor/Solicitor.

The recruitment of a Paralegal/Prosecutor this year supports the goal of enhancing resourcing capacity requirements and business continuity for prosecutorial needs allowing for transitioning towards having two individuals (Paralegal and contract Prosecutor/Solicitor) fully able to carry out all prosecutorial activities. The current contract Prosecutor/Solicitor's time is fully dedicated to prosecution responsibilities and, therefore, does not have capacity to act as an In-house Solicitor. Prosecutorial needs require two full time individuals currently providing for transition and for resourcing towards facilitating future Part III downloads.

The SDR also noted that there is an opportunity to significantly reduce legal costs with an In-house Solicitor. Legal costs for the County over the past 5 years and estimated for 2021 are outlined below:

County Legal Costs

Year	2016	2017	2018	2019	2020	5 Year Average	2021 (as at July 31 st)	2021 Extrapolated
Amount	298,777	188,569	235,141	285,325	262,440	254,051	193,291	331,356

Legal costs can vary year-over-year dependant on the extent and complexity of litigation matters being addressed by the County; therefore, a trend over 5 years is provided indicating \$254,051 and an estimate for 2021 at \$331,356. Joint and Several Liability Legislation places further burden on legal costs now and into the future with an increase in legal claims that ultimately include the County as a defendant. If the County were to hire an In-house Solicitor costs would be reduced with the ability for this role to advise on general legal matters and carry out many of the legal activities carried out currently by specialized law firms. Further, an In-house Solicitor, as a member of the senior management team, would allow for enhanced risk management and mitigation strategies by identifying proactively matters that pose risks for potential lawsuits; thereby, limiting future claims against the County and associated costs. Within StrategyCorp's SDR Senior Advisors documented that based on the type of legal work the County engages in and the type of Lawyer such a position is likely to attract, the County could expect to reduce expenditures on external legal counsel by 80%.

An In-house Solicitor, as an independently licensed Ontario lawyer, would provide legal advice and representation on behalf of the County. The functions that a Municipal In-house Solicitor would typically carry out are identified below:

- Provide legal representation to the County for most matters of law.
- Be a source of information, legal analysis and strategic advice to all County departments and Council on a broad range of legal matters including legislation, governmental regulations as well as agreements and by-laws. Core areas include municipal

governance, land use, development, real estate, property, construction, contract matters, provincial offences, and litigation matters.

- Prepare, review, and interpret legal opinions.
- Negotiate, prepare, and review agreements, contracts, leases, deeds, mortgages, easements, restrictive covenants, by-laws, policies, and other legal instruments to implement and safeguard the County's interests.
- Process real estate transactions, including expropriation, when required.
- Preparing by-laws, agreements, policies, and other legal documents, interpreting statutes, regulations, bylaws, agreements, and other legal documents, and conducting legal research.
- Act as the supervising solicitor for prosecution services, including management of prosecution staff within Court Services/POA.
- Represent the County on a wide range of litigation matters including the prosecution and appeals in the Ontario Court of Justice for Provincial Offences under the jurisdiction of the County and matters before various courts and administrative tribunals.
- Retain and instruct external legal counsel and other professionals.
- Attend Council / Committee and other meetings as required.

It is anticipated that this position would report to the CAO and would directly manage Paralegal/Prosecution staff within Court Services/POA; thereby, fully meeting the requirements of the MOU with MAG for the complete separation of prosecutorial oversight and processes from that of court administration.

In addition to the quantitative benefits outlined within the Financial Implications sections of this report there are several qualitative benefits that would be realized should the County have an In-house Solicitor on staff. County staff rely significantly on outside legal advice from external law firms given the lack of internal legal expertise. Firstly, an In-house Solicitor would be able to address many legal matters that are currently dealt with through law firms and, secondly, be able to advise staff on best courses of action when dealing with law firms and options being brought forward assessing potential costs and risks. In consultation with a law firm the County deals with, one of the major qualitative benefits for consideration from a risk management perspective is that an In-house Solicitor, as a member of the senior management team, would recognize potential risks proactively for consideration / assessment as opposed to reactively when lawsuits are possibly initiated against the County. Having a County In-house Solicitor on staff would provide legal representation that has the best interests of the County as priority with a full understanding of all strategic objectives ensuring alignment of legal decisions and direction. Currently the Purchasing and Risk Manager acts as a liaison between external law firms and County Departments when dealing with many formal legal claims or disputes. This is often related to insurance claims, liability claims and contractual disputes with external vendors and service providers. Acting in this capacity, the Purchasing and Risk Manager can spend a significant amount of time devoted to these activities. Much of these activities would transition to an In-house Solicitor which will allow the Purchasing and Risk Manager to direct more efforts to the increased demand related to procurement activities and for moving towards formal shared procurement services with interested member municipalities as was noted in the SDR.

Upon retirement of the contract Prosecutor/Solicitor, the County will need to address having sufficient capacity to carry out prosecutorial activities and meeting the requirement for a supervising solicitor as required under the MOU with MAG. Once the contract Prosecutor/Solicitor retires, the County will have one Paralegal on staff solely to facilitate all

prosecutorial needs. To address this, and in consideration of information contained within the SDR, staff are considering the following options:

1. Hire a Senior Paralegal/Prosecutor and contract with a Lawyer or law firm to act in capacity as supervising solicitor

- This option would likely provide capacity to meet prosecutorial activities within Court Services/POA dependent on possible legislated changes and somewhat meet business continuity needs with having on staff two Paralegals.
- Although there would be in place a supervising solicitor via a contract with an external lawyer or retainer with a law firm this would not fully meet requirements of the MOU with MAG ensuring full separation of prosecutorial activities given the two Paralegals (one as a Senior Paralegal), acting as Prosecutors, would report to the Court Services Manager in respect to all personnel matters inclusive of performance management. This reporting structure is contrary to ensuring Prosecutors' exercise of discretion is not influenced by any person or body.
- Staff would continue to rely on external law firms for all legal matters both general and specialized likely incurring more costs as evidenced by trend over the past 5 years. This is reflective of increased claims and legal advice required across all County departments as the breadth of activities, partnerships and complexity of operations continues to expand as well as the impacts from Joint and Several Liability Legislation. The Purchasing and Risk Manager would continue to act in the capacity as liaison with law firms dealing with multiple legal claims and disputes impeding ability to move towards expanded formal shared services arrangements with member municipalities for shared procurement services.
- County staff who lack legal expertise in dealing with external law firms will continue to take actions based on external legal advice without due consideration for other options that may present themselves and ability to fully understand and assess costs versus potential risks.

2. Hire a Paralegal/Prosecutor and an In-house Municipal Solicitor

- This option would likely provide capacity to meet prosecutorial activities within Court Services/POA dependent on possible legislated changes and enhance business continuity with having on staff two Paralegals as well as an In-house Municipal Solicitor who could also act as a Prosecutor should it be required.
- There would be in place a supervising solicitor by having on staff a Lawyer acting in this capacity. Under this option, two Paralegals, acting as Prosecutors, would report to and be fully managed by the In-House Municipal Solicitor; thereby, meeting the requirements of the MOU with MAG for having a supervising solicitor and full separation of prosecutorial activities such that a Prosecutors' exercise of discretion is not influenced by any person or body.

- Staff would direct most legal matters to the County Solicitor who would utilize external law firms for only specialized legal matters acting as representation for the County and liaison with all County Departments. Would provide for a trusted source of information, legal analysis and strategic advice to all County Departments and County Council on a broad range of legal matters including legislation ensuring alignment with strategic objectives.
- Would eliminate some of the tasks currently undertaken by the Purchasing and Risk Manager to focus greater attention on procurement as volume and scope of procurement activities increases and allow for additional capacity to facilitate more formal shared procurement services with member municipalities.
- As a member of the County's senior management team, an In-house Solicitor would greatly enhance risk management and mitigation with proactive legal advice on strategic directions recognizing risks, that otherwise would not have been identified, for potential liability to the County and minimization of reactive legal costs arising from lawsuits.
- Would ensure regulatory compliance with various statutes of legislation.
- Would allow for in-house legal expertise ensuring the ability to effectively assess cost and risk mitigation strategies when dealing with specialized legal firms.

StrategyCorp using the examples of Niagara, Elgin, and Middlesex recommended that the County consider bringing legal services in-house by retaining an in-house Barrister & Solicitor to reduce expenditures on external legal counsel and support succession planning. This recommendation, aligned with StrategyCorp's evaluative criteria of Value for Money, was assumed to garner \$12,000 to \$84,000 in savings. Under the Service Level evaluative criteria, StrategyCorp noted that there is also the opportunity to offer this as a shared service to interested local municipalities in the longer-term, improving service levels for the member municipalities. In context of the Implementation Considerations criteria it was noted that, securing Council approvals, preparing a job description, and recruiting the County Barrister and Solicitor could take approximately one year. The Risks and Sensitivities criteria highlighted that there will be circumstances where expenditure on external legal counsel cannot be reduced to the target 80% as utilized in StrategyCorp calculations.

Under this option, in consideration of implementation and transition, it is proposed that an In-house Solicitor and Paralegal/Prosecutor would be hired prior to the retirement of the current contract Prosecutor/Solicitor for a period of time sufficient to ensure uninterrupted service delivery.

Financial Impact

In assessing the financial implications, it is necessary to consider costs based on current staffing, contracted Prosecutor/Solicitor, and legal costs in comparison to estimates for the options presented:

1. Hire a Senior Paralegal/Prosecutor and contract with a Lawyer or law firm to act in capacity as supervising solicitor.
2. Hire a Paralegal/Prosecutor and an In-house Municipal Solicitor.

The resourcing for prosecutorial activities and fulfilling the requirement for a supervising solicitor under the MOU with MAG currently and under the options is provided below:

Current	Option 1	Option 2
Contracted Prosecutor/Solicitor (on-site full time)	Contracted Supervising Solicitor (not on-site, oversight only)	In-house Solicitor
Paralegal/Prosecutor	Senior Paralegal/Prosecutor	Paralegal/Prosecutor
	Paralegal/Prosecutor	Paralegal/Prosecutor

The current structure facilitates meeting the requirement for a supervising solicitor under the MOU with MAG as the current contracted Prosecutor is a Lawyer. The contracted Prosecutor/Solicitor is on site full-time and actively carries out prosecutorial duties. In conjunction with the Paralegal/Prosecutor this currently provides two dedicated individuals for resourcing prosecutorial functions.

Option 1 reflects no longer having a contracted Prosecutor/Solicitor. To meet the supervising solicitor requirement, a contract with a lawyer or retainer with a law firm would be necessary to provide oversight under the MOU. Option 1 also assumes a Senior Paralegal/Prosecutor would be required to ensure effective service delivery of prosecutorial activities with no longer having on-site full time a senior contract Prosecutor/Solicitor and maintain the current level of resourcing of two individuals for prosecutorial needs.

Option 2 also reflects no longer having a contracted Prosecutor/Solicitor. This preferred option proposes an In-house Solicitor who would fulfill the supervising solicitor requirement and provide for enhanced business continuity by having a third individual on staff who could carry out prosecutorial activities should it be required. Option 2 proposes that a Paralegal/Prosecutor at a senior level as contemplated in option 1 would not be required with having on staff an In-house Solicitor who would directly manage the two Paralegal/Prosecutors at the same compensation level.

Costs currently and as estimated under the options are provided below:

Cost	Current	Option 1	Option 2
Resourcing Costs	254,000	204,000	370,000
Supervising Solicitor Legal Cost	0	46,800	0
County Legal Costs	330,000	330,000	165,000
Total	584,000	580,800	535,000

Option 2, as the preferred option, reflects estimated savings of approximately \$49,000 a year in addition to the many qualitative benefits this would provide the County versus the current state.

Resourcing costs are based upon actual current contract prosecution costs and estimates for salary at the mean of the applicable salary grid for each position plus benefits and overhead. It is assumed the proposed Senior Paralegal/Prosecutor role would be one grid higher than the existing Paralegal role. The proposed In-house Solicitor is assumed to be at the same salary grid as the majority of County Directors. Total salary, benefits and overhead for the In-house solicitor is assumed at \$178,000 comprised of salary \$137,000, benefits and employer costs \$37,000 and overhead \$4,000. This compares to what StrategyCorp had contemplated in the SDR for \$159,000 reflective of median salary for a County Barrister and Solicitor inclusive of benefits and overhead.

Supervising solicitor costs under option 1 reflect an estimate for what would be required to contract with a lawyer or law firm to fulfill this function as required under the MOU with MAG. In consultation with a law firm that provides municipal POA prosecutorial services the actual costs would vary dependent on several factors including volume of prosecutions, complication of trials, capabilities of County Paralegal/Prosecutor staff, etc. At a very minimum services would be required to meet with County staff on a regular basis, review files and attend trials.

Legal costs are assumed based on an extrapolation of actual legal costs for 2021 totaling \$330,000. The five-year average 2016-2020 is \$254,000. As noted, Joint and Several Liability Legislation places further burden on legal costs now and into the future. Option 2 assumes that with the addition of an In-house Solicitor legal costs would be reduced by 50% recognizing that specialized legal services will still be required. This compares to the assumption in StrategyCorp's SDR that 80% in legal savings would be realized. In consultation with a law firm the County utilizes and for conservatism a 50% factor was applied.

Should option 2 be chosen, staff recommend that the In-house Solicitor and second Paralegal/Prosecutor be hired to allow for a transition period prior to the Prosecutor/Solicitor retiring to ensure continuity of operations. Overall savings, as noted above would provide sufficient funds for this initial transition.

Member Municipality Impacts

Having an In-house Solicitor at the County may provide an opportunity to provide some legal guidance or possibly shared services to member municipalities over the longer-term. As a new role, capacity would need to be assessed at a future date.

Conclusion / Outcomes

That Council authorize the addition of an In-house Solicitor and a Paralegal/Prosecutor to the organizational chart to realize net cost savings, enhanced risk management and business continuity and ensure compliance with the Memorandum of Understanding with the Ministry of the Attorney General.

Attachments

N/A