CARTERS
Integrated Practice, Proactive Advice

Charity & NFP Law Update
September 2025

Editor: Terrance S. Carter
Assistant Editors: Nancy E. Claridge, Ryan M. Prendergast and Adriel N. Clayton

Updating Charities and Not-For-Profits on Recent Legal Developments and Risk Management Considerations

September 2025

Sections

Highlights

Publications & News Releases

1. Submission by 34 Charity Lawyers to Finance Concerning Politicization of Charitable Status

By Terrance S. Carter and Jacqueline M. Demczur

On September 16, 2025, 34 charity lawyers from across Canada submitted a joint letter to the Minister of Finance and National Revenue expressing concern about the politicization of charitable status. This joint letter follows on Carters' letter on this same issue dated August 28, 2025, discussed in an article in our August 2025 Charity & NFP Law Update.

In the joint letter, the 34 signatories pointed out that existing laws and regulatory tools already ensure charities act transparently and in good faith, making politicized amendments unnecessary. For charities, these submissions serve as a reminder that maintaining an impartial and principles-based charitable framework is essential to preserving public trust and ensuring the long-term integrity of the charitable sector.

2. CRA News

By Theresa L.M. Man

2.1. Quarterly Updates from the Charities Directorate: Modernization, Online Filing, and Sector Engagement

On September 16, 2025, the Canada Revenue Agency's ("CRA") Charities Directorate released its quarterly update on its News and events for charities webpage, outlining its recent activities in the last quarter and its priorities for the fall.

Much of the focus of this update is on encouraging charities to file their T3010 Registered Charity Information Return online. This can be done by either filing through (a) the CRA's free, interactive form available in their CRA MyBA account, or (b) the CRA's new online filing service that allows charities or their authorized representatives to complete their return using CRA-certified software and then upload and submit it directly online through their CRA MyBA account.

It indicates that in the near future, the CRA will move toward online filing as the default method for submitting the T3010, instead of paper filing. Once submitted, the information in the return will be instantly processed, and the public portion of the financial information will be available on the CRA's online database of charities the next day. In doing so, the CRA intends to improve service delivery by making it faster, easier, and more secure for charities to meet their filing obligations.

The update also recaps a number of other recent CRA initiatives, including information for charities impacted by a natural disaster, publication of updated compliance and audit statistics for the 2024 to 2025 fiscal year, educational materials on completing the T3010, refreshed content on books and records obligations, and enhanced donor-focused web content to make it easier to find and understand. The Charities Directorate continues to offer resources to support the sector's digital transition.

2.2. T3010 Filing Deadlines and Digital Services

On September 12, 2025, the Charities Directorate, in its News and events for charities webpage, issued a reminder to the 15,000 charities whose fiscal year ended on March 31, 2025, that the deadline to file their T3010 Registered Charity Information Return is September 30, 2025. The CRA emphasizes that timely filing is essential to maintaining their charitable status. T3010 must be filed within 6 months after their year end, so the CRA reminded charities with different fiscal year ends to confirm their specific due dates.

Up till now, charities can file their T3010 using different means – by mail, fax or online. The CRA announced in the September news update that it will be phasing out fax services in the coming months. Instead, the CRA encouraged charities to use the CRA's secure online services or CRA-certified software to file their T3010 and submit organizational updates as explained above in the September 16, 2025 update.

For detailed instructions on how to complete the T3010, see the CRA's Guide T4033 *Completing Form T3010 Registered Charity Information Return*. When accessing the guide, make sure that the version of the guide matches the version of the T3010 that is being completed. At this time, the current version of the T3010 is version 24 and therefore Guide T4033 for version 24 must also be used.

The CRA also has a brief summary webpage entitled *Filing a Registered Charity Information Return (T3010)*, as well as a checklist entitled *T3010 checklist – how to avoid common mistakes when filing your return*. Both the summary webpage and checklist are not as informative or detailed as Guide T4033. There is also a CRA webinar *Completing your T3010 online: A walkthrough for charities* that was aired on June 17, 2025, and a transcript is available on CRA's website.

3. Legislation Update

By Terrance S. Carter and Adriel N. Clayton

3.1. Finance Re-Releases Draft Legislation for Trust Reporting

Readers of our *Charity & NFP Law Updates* may be familiar with the extensive new trust reporting requirements introduced under the *Income Tax Act* (ITA) in 2022. As most recently detailed in *Charity & NFP Law Bulletin No. 528*, the Department of Finance Canada ("Finance") proposed draft legislation on August 12, 2024, to amend certain aspects of new trust reporting requirements. However, although the August 2024 Draft Legislation was not introduced or passed, Finance re-released the draft legislation with amendments on August 15, 2025 through Legislative Proposals Relating to the *Income Tax Act* and the *Income Tax Regulations* (Technical Amendments) (the "2025 Draft Legislation").

Broadly speaking, the 2025 Draft Legislation is functionally similar to the 2024 Draft Legislation in its application to charities and not-for-profits. In this regard, the 2024 Draft Legislation had proposed, among other things, to: (1) extend the exemption for reporting bare trusts for one additional year, being the 2024 taxation year; (2) exclude bare trusts from the definition of a trust or estate in subsection 104(1) of the ITA, except in limited circumstances; and (3) identify certain trusts that are deemed to be express trusts, and therefore subject to filing requirements, together with exceptions to these "deemed trusts".

While the 2025 Draft Legislation removes the "deeming" language with regard to "deemed trusts", the effect of the provisions remains substantially the same –for the purposes of section 150 of the ITA (concerning returns and the filing thereof) and section 204.2 of the *Income Tax Regulations* (concerning additional reporting for trusts), a trust includes an express trust in which: (1) one or more persons (the legal owner) have legal ownership of property that is held for the use of, or benefit of, one or more persons or partnerships, and (2) the legal owner can reasonably be considered to act as agent for the persons or partnerships who have the use of, or benefit of, the property. The 2025 Draft Legislation also clarifies the types of bare trusts that would still need to meet the reporting requirements.

As we had previously outlined in our letter to Finance dated September 10, 2024, the 2024 Draft Legislation was exceedingly complex and left many questions unanswered. The 2025 Draft Legislation has unfortunately done little to alleviate those concerns.

3.2. Federal Bill C-9 Proposes Amendments to the *Criminal Code* to Protect Places of Worship

The federal government introduced Bill C-9, *An Act to amend the Criminal Code (hate propaganda, hate crime and access to religious or cultural places)*, which passed First Reading in the House of

Commons on September 19, 2025. The Bill introduces the *Combatting Hate Act*, which proposes to amend the *Criminal Code* to protect places of worship. The backgrounder to the proposed legislation states that the proposed amendments would:

- Make it a crime to wilfully intimidate and obstruct people from accessing places of worship, as well as schools, community centres and other places primarily used by an identifiable group.
- Make hate motivated crime a specific offence, ensuring such conduct is more clearly denounced and that offenders are held accountable.
- Make it a crime to wilfully promote hatred against an identifiable group by displaying certain terrorism or hate symbols in public.
- Codify a definition of 'hatred' to clarify when conduct constitutes a hate crime.
- Streamline the process for prosecuting hate crimes by removing the requirement for Attorney General consent for laying hate propaganda charges.

These amendments would address rising concerns regarding hate towards certain communities, such as places of worship, by clarifying what is permitted as freedom of expression and what is not permitted as a hate crime. Specifically, the changes do not criminalize safe and peaceful protests or assemblies where individuals voice their concerns. Rather, they focus on more clearly criminalizing behaviour that is intimidating, obstructive and hate motivated. Further, the removal of the requirement for Attorney General consent in laying hate propaganda charges is aimed at allowing law enforcement to act more quickly in responding to hate-motivated acts and better protect communities, such as places of worship.

Although the proposed amendments criminalize behaviour that intrude on places of worship, the backgrounder states that Bill C-9 "is carefully designed to make sure that it does not apply to people who are simply communicating information, peacefully protesting, or otherwise not engaging in criminal activity around religious and cultural centres and other specified places. These changes would not prohibit protest, assembly or unreasonably affect an individual's freedom to voice their concerns in a safe and peaceful manner."

4. Tax Court of Canada Finds Minister is not Entitled to Reassessment Beyond Normal Period

By Ryan M. Prendergast

The Tax Court of Canada, in its September 11, 2025 decision in *Toews v. The King*, restored a taxpayer's $39,398 charitable donation claim after the Minister of National Revenue (the "Minister") had eliminated it on reassessment for alleged participation in a leveraged donation scheme (the "Scheme").

The Minister argued that it could reassess David Toews' 2008 taxation year despite the expiry of the normal reassessment period. The Minister further claimed that Mr. Toews was not entitled to the charitable donation amount claimed because certain individuals connected to the Scheme were liable for a penalty that had not been paid. The court considered three issues: (a) whether the Scheme constituted a tax shelter; (b) what is meant by being "liable to a penalty"; and (c) whether any of the four individuals assessed a penalty were in fact liable to one.

On the first issue, the court held that the Scheme constituted a tax shelter. On the remaining issues, an appeals officer at the Canada Revenue Agency (CRA) testified that four people – Mr. Ciccone, Karen Thomson-Ciccone, Carmine Domenicucci and Thomas Johnson – were assessed penalties by the CRA in respect of the Scheme. It was noted that the assessment of a penalty does not equate to

liability to a penalty but rather liability is to be determined by the requirements of the statutory provision that imposes the penalty.

Ultimately, the court allowed the appeal and held that, based on the evidence, none of the assessed persons were liable to a penalty and as such, the Minister could not reassess Mr. Toews for the 2008 taxation year beyond the normal reassessment period. As a result, Mr. Toews was allowed to claim the charitable amount in full. The reassessment was referred back to the Minister for reconsideration and reassessment.

This decision underscores the limits of the Minister's authority to reassess beyond the normal reassessment period and represents a rare positive result for a taxpayer involved in a tax shelter. At the same time, it serves as a reminder for charities and donors alike that courts will closely scrutinize complex gifting programs that can appear too good to be true. Registered charities that participate in such arrangements could still be subject to penalties and revocation, which is exactly what happened to the charity involved in the Scheme in this decision.

5. Ontario Court Upholds Order to Grant Membership to Comply with Not-for-Profit's By-laws

By Esther S.J. Oh and Urshita Grover

In the Ontario Superior Court of Justice Divisional Court's decision in *Provincial Women's Softball Association v. Mississauga Majors Baseball Association*, released on May 12, 2025, the Superior Court of Justice dismissed the Provincial Women's Softball Association's ("PWSA") appeal and affirmed the earlier order compelling the PWSA to grant association membership to the Mississauga Majors Baseball Association ("Majors").

As background, in the previous application that was summarized in our November 2024 *Charity & NFP Update*, the Majors, a not-for-profit corporation offering softball programs for women and girls, had applied for association membership in the PWSA twice, but the PWSA denied both of the membership applications. The Majors then brought an application to the court under section 191 of the Ontario *Not-for-Profit Corporations Act, 2010* ("ONCA"), seeking a compliance order to ensure that the PWSA complies with the Act and the PWSA by-laws. The application judge ordered the PWSA to comply with its own by-laws and admit the Majors as a member in accordance with the requirements set out in the PWSA by-laws. The PWSA appealed this decision.

On appeal, the PWSA argued that the application judge erred by finding that the Majors met all the criteria for association membership in the PWSA by-laws. In this regard, the PWSA argued that "the source of that error is the application judge's failure to read sub-articles 2.1(a) and (b) of the PWSA by-laws together".

Article 2.1 of the PWSA by-laws sets out the two categories of members, which include (a) Association Membership and (b) Team Membership. In this regard, Article 2.1(a) states that "All PWSA affiliated organizations comprising of more than one Team Member […] will be Association members". Article 2.1(b) mentions that "All PWSA affiliated female softball teams […] will be Team Members, who must be a member of an Affiliated Association."

PWSA argued that an association must already have "more than one team member" in place at the time of the application for membership, and it "was not enough, as the application judge found, that they 'put forward' or 'sought to field' more than one team." In this regard, PWSA argued that "those teams were not *already* team members and therefore did not meet the definition housed in article 2.1(b)."

After reviewing the evidence, the court first confirmed the standard of review as "palpable and overriding error" because the application judge was required to interpret the ONCA, the PWSA by-laws, and its operating rules, and to apply those interpretations to the facts. The court also explained that a deferential approach was warranted because not-for-profit corporations' by-laws are "essentially

contractual in nature" (even if the Majors were not members or parties to the contract when they applied for membership), thereby requiring the application judge to engage in an inquiry of mixed fact and law as governed by principles of contractual analysis.

The court then rejected the PWSA's argument that the application judge's interpretation of the PWSA by-laws was tainted by a palpable and overriding error because the PWSA's position produced an unworkable "chicken-and-egg" problem. If an association must already have two or more team members before applying for membership, there must be a way for individuals to join as team members first. But due to lack of clarity in the PWSA by-laws, under the PWSA's proposed interpretation, no organization applying for membership could satisfy those requirements.

The Majors argued that the PWSA by-laws clearly state that applicants who meet the listed conditions "will be Association members," without providing any discretion to refuse membership where the criteria set out in the by-laws are satisfied.

The court found that the more reasonable interpretation is the one presented by the Majors, which rejects the PWSA's unworkable interpretation above.

The court also agreed with the application judge that the PWSA, by applying operating rule 1.02 and acting on concerns about poaching players from neighbouring associations, had "acted outside the scope" of its own by-laws. Operating rules cannot override or add to the by-laws' conditions for membership. As a side note, the ONCA subsection 48(1), requires that the conditions of membership must be set out in the by-laws.

The court also noted that the Majors were not told that their applications for membership had failed because they did not have more than one team, as this assertion was made for the first time before the application judge. The court found no palpable and overriding error in the application judge's earlier decision, dismissed the appeal, and awarded the Majors $17,000 (all-inclusive) in costs.

This decision affirms that the conditions to qualify to be admitted as a member must be set out in the by-law for a not-for-profit corporation in accordance with subsection 48(1) of the ONCA. In addition, not-for-profit corporations must comply with the requirements set out in their by-laws when admitting members. Rules or policies that are separate from the by-laws will not override the requirements set out in the by-laws.

6. Ontario Superior Court Upholds 'At Any Time' Language in Termination Clause

By Barry W. Kwasniewski and Martin U. Wissmath

In *Li v. Wayfair Canada ULC*, decided on July 9, 2025, the Ontario Superior Court upheld a "for cause" termination clause in the employment agreement that allowed the employer to terminate employment "at any time". The court dismissed the plaintiff's claim for common law notice damages, finding that the employment agreement complied with the *Employment Standards Act*, *2000* (ESA) and was therefore enforceable. For charities and not-for-profits, this decision provides reassurance that properly drafted clauses limiting entitlements to ESA minimums may withstand judicial scrutiny.

The Plaintiff, Song Li (the "Employee"), sought summary judgment arising from his dismissal without cause from his position as Senior Product Manager with the Defendant, Wayfair Canada ULC (the "Employer"). The Employee worked for the Employer from January 23, 2023, to October 17, 2023, totalling just under nine months of employment. At the time of his dismissal, the Employee was 45 years old and earned an annual salary of $221,564 CDN. Upon termination, he was given one week of salary with benefits, the minimum required by the ESA, in accordance with the employment contract. He sued for common law notice damages.

The main issue before the court was whether the termination clause was enforceable. The termination clause in the employment contract stated:

> The Company may terminate your employment at any time for Cause without notice, pay in lieu of notice, severance, benefits

> continuance or other compensation or damages of any kind … unless expressly required by the ESA in which case only the minimum statutory entitlements will be provided.

Notably, the definition of "cause" included reference to the requirements under the ESA:

> It should be noted the second page of the Employment Agreement, under the heading "Joining Bonus" contains the sentence "For all purposes in this letter, "Cause" means any wilful misconduct, disobedience, or wilful neglect of duty that is not trivial and has not been condoned by the company and that constitutes "cause" under the ESA".

The court further noted that the without-cause termination clause also included reference to the ESA requirements:

> "After your probationary period concludes, in the absence of Cause, the Company may terminate your employment at any time and for any reason" which goes on to state "by providing you with only the minimum statutory amount of written notice required by the ESA or by paying you the minimal amount of statutory termination pay in lieu of notice required by the ESA, or a combination of both, as well as paying statutory severance pay required by the ESA, providing benefits continuance for the requisite minimum statutory period under the ESA and all other outstanding entitlements, if any, owing under the ESA".

The Employee relied on the 2024 decision in *Dufault v. The Corporation of the Township of Ignace* where the court held that an employer's right to terminate was not absolute and held that the inclusion of the words "at any time" in the termination clause rendered it unenforceable. The Court of Appeal upheld the trial decision, and the employer's application for leave to appeal was dismissed. However, the court distinguished this case from *Dufault* as the termination clause in *Dufault* allowed for termination in some cases in violation of the ESA requirements. By contrast, the termination clause in this case simply limited the Employer's obligations to those required under the ESA, so the use of the words "at any time" was found to not invalidate the termination clauses.

The decision in this case provides some clarification for employers following the decision in *Dufault*. Specifically, in finding that the termination clause in this case was enforceable, the court highlighted that termination clauses, both with and without cause, should be read as a whole and as long as they comply with the required employment legislation, they can be enforceable. In other words, it confirms that the inclusion of the words "at any time" may not automatically render a termination clause unenforceable, although the case law remains not entirely clear on that point considering the precedent established in *Dufault*. This case demonstrates how closely courts will review contractual termination clauses to determine enforceability.

7. IP Basics for Charities and NFPs: Foundations of Intellectual Property

By Sepal Bonni and Cameron A. Axford

This article is part of an ongoing series on intellectual property for charities and not-for-profits (NFPs), aimed at helping organizations understand how IP rights apply in their sector and how best to protect and manage these valuable assets.

Intellectual property (IP) refers to creations of the mind that carry legal rights of ownership and protection. It encompasses everything from inventions and technological advances to artistic works, brand names, logos, and confidential business information. While IP is intangible, its importance is very real: it can protect an organization's innovations, strengthen its identity, and enhance both its financial and reputational value.

In Canada, there are several distinct forms of intellectual property protection. Patents protect new, useful, and non-obvious inventions, granting the patent holder the exclusive right to make, use, and sell the invention in Canada for up to 20 years. Trademarks protect words, symbols, or designs – or combinations of these – that distinguish the goods or services of one organization from those of others. A strong trademark not only identifies the source of goods and services but also conveys the values and reputation behind the brand. Copyright protects original literary, dramatic, musical, and artistic works from the moment they are created, giving authors the sole right to reproduce, publish, and perform their works. Industrial designs protect the unique visual features of a product – its shape, pattern, or configuration – for up to 15 years when registered. Trade secrets safeguard confidential business information that derives commercial value from remaining secret, such as donor lists, financial models, or specialized processes. Unlike other forms of IP, protection for trade secrets depends on maintaining secrecy through contracts and internal safeguards rather than registration.

Protecting intellectual property matters because it allows organizations to control how their creations are used and prevents unauthorized exploitation. IP rights can help organizations generate revenue through licensing, sales, or partnerships, and they often represent a significant portion of an entity's overall value. Trademarks in particular play a key role in brand development, linking a name or logo not just to the goods and services provided but also to the trust, mission, and values associated with the organization. For many entities, including charities and NFPs, IP is among their most valuable assets.

For charities and NFPs, IP protection is just as important as it is for commercial enterprises. A charity's logo or name, for example, can be registered as a trademark to prevent misuse by others and to ensure donors know they are supporting the genuine organization. Copyright automatically protects materials such as educational resources, research publications, and promotional content, but organizations should be aware of how to assert and manage those rights. Trade secrets may take the form of confidential donor lists or fundraising strategies, which must be carefully safeguarded. At the same time, charities and NFPs need to respect the intellectual property rights of others by securing the necessary permissions or licences when using third-party materials.

In today's environment, where information flows rapidly and reputational risks are high, effective management of intellectual property is central to protecting an organization's mission and credibility. By understanding the different forms of IP protection available in Canada and how they apply in the charitable and NFP sector, organizations can both secure their own assets and ensure they uphold the rights of others.

In our next article in this series, we will examine why trademarks matter for charities and NFPs.

8. Federal–Ontario Privacy Regulators Expand Cooperation: Alignment Now Explicit Beyond Health

By Cameron A. Axford and Martin U. Wissmath

Federal and provincial privacy regulators have tightened their collaboration by entering into a new agreement designed to strengthen enforcement and harmonize oversight across federal and provincial boundaries. Announced September 11, 2025, the Privacy Commissioner of Canada (OPC) signed a Memorandum of Understanding (MoU) with Ontario's Information and Privacy Commissioner (ON IPC), which updates and broadens an earlier 2014 framework.

The MoU, titled "Memorandum of Understanding Between the Information and Privacy Commissioner of Ontario and the Privacy Commissioner of Canada on Mutual Assistance and Information Sharing in the Administration and Enforcement of Laws Protecting Personal Information", sets out how the two regulators (the "Regulators") will share information and provide mutual assistance in carrying out their respective privacy mandates. For charities and not-for-profits, the development is significant because it signals closer regulatory coordination in areas where their activities often straddle both federal and provincial privacy laws.

The original 2014 MoU largely focused on health information through Ontario's *Personal Health Information Protection Act* (PHIPA) and its interaction with federal private-sector privacy law, the *Personal Information Protection and Electronic Documents Act* (PIPEDA). Since then, the ON IPC's role has expanded in practice, and the 2025 MoU makes this cooperation explicit to include the *Freedom of Information and Protection of Privacy Act* (FIPPA) and the *Child, Youth and Family Services Act* (CYFSA). The 2025 MoU responds to these developments by explicitly extending cooperation to these additional statutes. It also builds on the Privacy Commissioner of Canada's mandate under PIPEDA and the *Privacy Act*.

The heart of the agreement is practical: it sets out procedures for sharing information, coordinating investigations, and making referrals when a matter falls within both commissioners' jurisdictions. Designated contacts in each office will oversee communication, and both regulators commit to sharing information to the extent permitted by law. Importantly, the MoU provides that information may only be used for the purpose for which it was shared, and each office must maintain confidentiality. Statutory limits remain. Ontario's commissioner cannot disclose cabinet records or solicitor-client privileged information, for example, and the federal commissioner remains bound by restrictions under the *Access to Information Act*.

The new MoU is structured around key operational principles. The Objective is to provide a comprehensive framework for cooperation. Section II details the Procedures Relating to Mutual Assistance. A core function is the ability of the Regulators to jointly investigate a matter arising under Ontario statutes and PIPEDA. As part of such joint efforts, the Commissioners may jointly investigate, deliberate on matters, and issue joint decisions, recommendations, or reports. Furthermore, the Regulators may share information relevant to an ongoing or potential investigation, complaint, audit, or review, or information that could assist either Participant in fulfilling their respective functions. The MoU also outlines practical steps, such as designating primary contacts for requests for assistance and establishing procedures for the prompt notification of inaccurate or incomplete shared information.

Section III introduces essential Limitations on Assistance and Use. This section provides that assistance or information sharing remains discretionary and must always be consistent with applicable laws, important interests, and priorities of the Regulators. For instance, the ON IPC is expressly prohibited from disclosing information that qualifies for exemptions under FIPPA, such as Cabinet records, law enforcement records, or records protected by solicitor-client privilege. Similarly, the OPC is restricted by federal statutes (PIPEDA, the *Privacy Act*, and the *Access to Information Act*) from disclosing information pertaining to Confidences of the King's Privy Council, law enforcement records, or solicitor-client privilege. The Regulators affirm that information will only be shared to the extent necessary for the MoU's purposes and will not be used for unauthorized purposes. Importantly, Section VII confirms that the MoU is not intended to create binding legal obligations or exceed a Participant's jurisdiction or legal authorization.

Further provisions of the MoU govern data security and legal privilege. Section IV mandates that information shared must be treated as confidential and cannot be further disclosed without the express written consent of the providing Participant. The Regulators must take reasonable steps to ensure shared information is transferred, retained, and disposed of securely. In cases of joint activities, communications protected by legal professional privilege will be subject to common interest privilege. Section V regulates the Length of Retention of Information, requiring that data not be retained longer than necessary to fulfill the purpose for which it was shared.

The new MOU represents continuity with past practice but also a maturation of regulatory cooperation. For charities and not-for-profits, it underscores that privacy is part of a wider governance framework that increasingly expects organizations to manage information responsibly across borders and statutes. As regulators close ranks, so too must charities and not-for-profits close any gaps in their privacy practices.

9. AI Governance in Alberta: What Charities and NFPs Need to Know

By Cameron A. Axford and Martin U. Wissmath

On July 15, 2025, the Office of the Information and Privacy Commissioner of Alberta ("AB IPC") released its *Comments from the Office of the Information and Privacy Commissioner Regarding Responsible AI Governance in Alberta* ("Report"). The Report sets out recommendations about how Alberta might regulate artificial intelligence in the future, reflecting the AB IPC's views on what an ideal legal and policy framework could look like if enacted.

The issues raised in the Report are relevant for charities and not-for-profits that handle personal information or are considering the use of AI tools in their operations. Importantly, the AB IPC stresses that even a robust privacy law regime on its own is not sufficient to address the full range of risks and challenges presented by AI, requiring a broader legal and policy response. The views of the AB IPC regarding AI regulation may become influential in other provinces and federally.

At the centre of the AB IPC's Report is the suggestion that Alberta adopt a standalone AI law to complement existing privacy statutes. The AB IPC notes that current laws, including the *Personal Information Protection Act* (PIPA), the *Health Information Act* (HIA), and the new *Protection of Privacy Act* (POPA), provide only limited oversight of artificial intelligence. In the Commissioner's view, AI is advancing too quickly and carries too many risks to be addressed solely through privacy law. Drawing on the federal government's previously proposed *Artificial Intelligence and Data Act (*AIDA) and the European Union's *AI Act*, the AB IPC argues that Alberta-specific rules would better reflect provincial jurisdiction over healthcare, commerce, and public services. The acceptance of these proposals would eventually have implications for charities and not-for-profits that use AI in their work.

For charities and not-for-profits (NFPs), one of the most significant themes in the AB IPC's Report is the treatment of privacy and data stewardship. The Report emphasizes anonymization and de-identification as safeguards when personal or health information is used in AI systems. This is an important consideration for organizations that maintain donor databases, membership records, or sensitive client files. Although the AB IPC cannot impose new obligations on its own, its recommendations indicate where regulation may head in the future. Organizations in the sector would therefore be well advised to keep in mind that new expectations around the use of personal information with AI could emerge.

Another theme is governance. The AB IPC Report highlights fairness, transparency, accountability, and good governance as essential principles for AI oversight. These are values that align closely with the fiduciary duties of charity and NFP directors, who already bear responsibility for ensuring their organizations operate lawfully and ethically. The Report suggests that boards may need to think about AI use in the same way they think about data protection or cybersecurity, treating it as a governance matter that requires risk assessment and oversight. These recommendations reflect an evolving standard of care that boards may eventually be expected to meet if such rules are introduced.

The Report also notes the importance of public trust. Surveys conducted by the Commissioner show that Albertans are cautious about AI, particularly in healthcare and government services. Charities and NFPs rely heavily on the trust of donors, members, and communities. The AB IPC's comments underline the risk that adopting AI tools without clear explanations and safeguards could undermine that trust, signalling that regulators are paying attention to managing public concern and perceptions of AI adoption, which matters as much to charities as to government.

Finally, the Report encourages engagement with its process. The Commissioner has invited government, health, and private sector stakeholders to provide input into the development of a framework for responsible AI governance. Although charities and NFPs are not the primary audience, the sector does have a perspective worth contributing. Advocacy organizations and umbrella groups may wish to consider participating in consultations, particularly to highlight the challenges of compliance for smaller organizations and the unique sensitivities of handling health or client data.

The AB IPC has outlined a possible direction for Alberta, but these remain suggestions at this stage. Still, they provide useful insight into how regulators are thinking about AI, and they give organizations an opportunity to prepare. Charities and NFPs that already collect or use personal information in ways that may intersect with AI should take note of these recommendations, both for risk management today and for planning ahead in case government decides to act on them in the future.

10. Ontario Small Claims Court Monetary Limit to be Increased to $50,000

By Sean S. Carter

As of October 1st, 2025, changes to O. Reg. 626/00, Small Claims Court Jurisdiction and Appeal Limit will come into force and increase the current monetary limit for claims in Ontario's Small Claims Court from $35,000 to $50,000, exclusive of costs and interest. This amendment has been made with the stated intent to allow greater access to the Small Claims Court for new plaintiffs and may allow current plaintiffs to increase their claim amount up to the new monetary limit of $50,000 to better reflect the plaintiff's losses.

The Small Claims Court has jurisdiction to hear actions for repayment of money or the recovery of personal property up to the monetary limit. The court hears matters in a summary manner, encouraging a more timely and efficient resolution. The upcoming monetary limit increase are intended to simplify the litigation of minor disputes by increasing access to justice, with less stringent rules of evidence and fewer procedural steps potentially reducing time and costs in court.

However, charities and not-for-profits should also be aware that as the increase may encourage more claims to be brought in Small Claims Court, the court's "costs" structure presents particular challenges for organizations with limited budgets. Unlike in other Ontario courts, successful parties in Small Claims Court are not frequently rewarded with meaningful recovery of their legal expenses, with extremely low limits (in comparison to those available in the Superior Court of Justice of Ontario) to reimburse successful parties for their legal costs. In other words, even when a charity or not-for-profit successfully defends against a frivolous or unfounded claim, it will likely still bear the vast majority of the burden of its own legal defence costs, even if the defence is successful and the judgment is for damages less than amounts previously offered to the plaintiff to settle the claim.

The Small Claims Court, with extremely small exceptions, is limited to awarding costs to the successful party of 15% of the amount claimed and 30% if the amount awarded is the same or less than amounts offered by the successful party to settle the matter at a much earlier stage. In the Superior Court of Justice of Ontario, costs are awarded to successful parties as a percentage of the actual amounts spent towards legal fees and disbursements; which could range typically range from approximately 40% (partial indemnity costs) to approximately 80% (substantial indemnity costs) of the actual amount spent by the successful party or the party whose offer to settle was the same or less than the amount awarded at trial.

Ultimately, while the higher limit may improve access to justice, it also has the potential to create unintended burdens for charities and not-for-profits, among other defendants, particularly in the face of frivolous claims. With limited ability to recover defence costs, these organizations face the prospect of increased claims at the Small Claims Court level, which could then result in the diversion of financial resources originally intended for an organization's charitable or not-for-profit purposes.

11. AML/ATF Update

By Terrance S. Carter, Nancy E. Claridge and Sean S. Carter

11.1. Ottawa Release 2025 National Risk Assessment on AML/ATF Issues

The federal government's 2025 National Risk Assessment on Money Laundering and Terrorist Financing is, at first glance, a technical document focused on public safety risks in Canada. However, for charities and not-for-profits (NFPs), several sections carry important implications. While the charity and NFP sector continues to be recognized as a low-risk player overall, the report highlights both

vulnerabilities and regulatory approaches that could directly affect organizations, particularly those engaged in international or humanitarian work.

The report acknowledges that Canada's non-profit sector is vast, with roughly 246,000 organizations, including 85,518 registered charities. Most are domestically focused, with simple structures and transparent operations. For this large majority, the terrorist financing risk is considered low. However, the report notes that a small subset of organizations – especially those raising and disbursing funds internationally – are more exposed to potential misuse, such as diversion of funds or exploitation in conflict zones. Importantly, these risks do not apply across the sector but only to a narrow group with higher exposure to cross-border or high-risk activities.

A second theme in the report is the challenge of "de-risking." Some charities and NFPs have reported difficulty accessing banking services because financial institutions, wary of regulatory risks, prefer to cut ties rather than manage risk on a case-by-case basis. The government warns that financial exclusion can impede legitimate humanitarian aid, push organizations toward informal or less transparent channels, and even increase overall risk. Instead, regulators and institutions are encouraged to adopt proportionate, risk-based approaches that safeguard the financial system without unduly disrupting charitable operations.

The report also highlights new oversight mechanisms that charities should be aware of. The Canada Revenue Agency's Review and Analysis Division continues to play a role in monitoring risks within the registered charity sector. In addition, Global Affairs Canada may apply extra anti-terrorist financing measures for charities and NFPs seeking federal funding to work in high-risk jurisdictions. The report further notes the existence of the Criminal Code's authorization regime, introduced in 2023, which provides protection from criminal liability for humanitarian actors operating in terrorist-controlled areas. Charities and NFPs using this regime, however, must meet conditions imposed by Public Safety Canada, including potential reporting requirements, which has proved difficult in practice for many organizations.

Engagement with the sector is another recurring theme. The government points to ongoing work with the CRA's Advisory Committee on the Charitable Sector, as well as new interdepartmental dialogues launched in 2024, designed to improve communication with charities and NFPs on money laundering, terrorist financing, and sanctions evasion risks. The CRA has also developed educational resources for charities to better understand terrorist financing risks and how to mitigate them. This suggests a recognition that effective oversight requires partnership with, not just regulation of the sector.

Finally, the report notes methodological changes in the way risks are assessed. A "residual risk lens" has been adopted to account for existing safeguards and to reduce the chance of overstating sector-wide risks. The aim is to ensure that oversight and enforcement focus on the relatively small number of organizations with higher exposure, while avoiding unnecessary burdens on the majority of charities and NFPs that pose little risk. This reflects a shift toward more nuanced, proportionate regulation, which the sector has long advocated for.

For charities and NFPs, the practical takeaways are threefold. First, while most organizations remain low risk under federal assessments, those engaged internationally – particularly in conflict-affected regions – should expect continued scrutiny. Second, organizations facing banking challenges may find some relief in the government's recognition of the harms of de-risking, although whether this translates into policy change remains to be seen. And third, the government appears committed to engaging with the sector and refining its oversight tools in ways that balance security concerns with the need to preserve the vital contributions of charities and NFPs.

As always, directors and senior management should ensure that their organizations maintain strong internal controls, understand their obligations under anti–money laundering and counter–terrorist financing rules, and stay attuned to evolving federal guidance. The 2025 National Risk Assessment does not reflect new law, but it does provide important insight into the regulatory mindset and the areas where charities may encounter closer scrutiny in the years ahead.

11.2. UN Consultations on Sanctions: Calls for Input on Remedy and Humanitarian Action

The United Nations Special Rapporteur on the negative impact of unilateral coercive measures has launched two consultations, both of which close on 20 October 2025. These initiatives highlight the ways in which sanctions regimes affect human rights, humanitarian action, and accountability, and they offer charities and not-for-profits an important opportunity to contribute to shaping international guidance.

The first consultation relates to a draft Guidance on Effective Remedy, Responsibility and Redress in Unilateral Sanctions Environment. The Special Rapporteur has identified persistent barriers to justice for individuals and organizations harmed by unilateral sanctions, including the widespread over-compliance by businesses and financial institutions. The draft guidance sets out obligations for states and international organizations under international law, the responsibilities of businesses, and the rights of affected individuals and groups. It emphasizes accountability for wrongful acts, access to legal aid, and the need for full restitution and compensation. Civil society input is sought to ensure these principles are practical and responsive to real-world impacts.

The second consultation addresses the humanitarian consequences of sanctions. In many cases, sanctions and related restrictions have hindered the delivery of aid, disrupted supply chains, and created a chilling effect that deters humanitarian engagement. Even where exemptions exist for humanitarian work, over-compliance by banks and suppliers often prevents organizations from transferring funds or obtaining essential goods. Humanitarian actors are sometimes forced to scale back or modify their work due to donor restrictions and risk-averse policies, undermining the principles of humanity, neutrality, impartiality, and independence. The draft Principles and Guidance on Humanitarian Action aims to tackle these challenges by offering standards to protect the delivery of assistance while clarifying the obligations of states and businesses in sanctions environments.

For Canadian charities and not-for-profits with international operations or partnerships, these consultations highlight both the risks and the opportunities in the current sanctions landscape. They underscore the importance of robust due diligence, careful management of funding and partnerships, and ongoing awareness of how sanctions can affect programming. They also present a chance for the sector to provide input into the development of global standards that may help reduce barriers to humanitarian work and ensure that individuals and communities retain access to justice and remedies when adversely affected by sanctions.

12. Best Lawyers® Rankings 2026

Seven lawyers of Carters Professional Corporation have been ranked as leaders in their practice areas by Best Lawyers in Canada® for 2026.

- Theresa L.M. Man, has been ranked as a leader in the area of Charity and Non-Profit Law. In addition, Theresa has been named “Lawyer of the Year” in the practice area of Charities and Not-for-Profit Law in Toronto.
- Sean S. Carter has been ranked as a leader in the area of Corporate and Commercial Litigation.
- Terrance S. Carter - has been ranked as a leader in the areas of Charity and Non-Profit Law and Intellectual Property Law.
- Jacqueline M. Demczur has been ranked as a leader in the area of Charity and Non-Profit Law
- Esther S.J. Oh, has been ranked as a leader in the area of Charity and Non-Profit Law.
- Ryan M. Prendergast, has been ranked as a leader in the area of Charity and Non-Profit Law.
- Esther Shainblum has been ranked as a leader in the areas of Charity and Non-Profit Law and Health Care Law.

In the Press

Charity & NFP Law Update – August 2025 (Carters Professional Corporation) was featured on Taxnet Pro™ and is available online to those who have OnePass subscription privileges.

Recent Events & Presentations

Toronto Metropolitan University (TMU) hosted a webinar on **Monday, September 15, 2025**, and Ryan Prendergast presented on the topic of Legal, HR and Governance for Nonprofits.

Upcoming Events

Christian Legal Fellowship is hosting their 2025 National Conference from **September 25 – 28, 2025** at the Sandman Signature Mississauga Hotel. Terrance S. Carter will be a guest speaker and providing an Essential Charity Law Update for 2025.

Association of Treasurers of Religious Institutes will host the ATRI 2025 Conference, Beacons of Hope, in Halifax, Nova Scotia from **September 26 – 29, 2025**. Terrance Carter will be presenting on Saturday September 27, 2025, on the Essential Charity Law Update 2025.

Carters Annual Charity & Not-for-Profit Law Webinar 2025 will be hosted by Carters Professional Corporation and held on **Thursday, November 13, 2025**. Special Guest Speakers will be Mr. Bruce MacDonald, President and CEO of Imagine Canada and Mr. Kenneth Hall, President of Robertson Hall Insurance. Details are posted at carters.ca.

Legal Team

Editor: Terrance S. Carter
Assistant Editors: Nancy E. Claridge, Ryan M. Prendergast, and Adriel N. Clayton

Cameron A. Axford, B.A. (Hons), J.D. - Cameron is an associate whose practice focuses on Carter's knowledge management, research, and publications division. He articled with Carters from 2022 to 2023 and joined the firm as an associate following his call to the Ontario Bar in June 2023. Cameron graduated from the University of Western Ontario in 2022 with a Juris Doctor, where he was involved with Pro Bono Students Canada and participated in the BLG/Cavalluzzo Labour Law Moot. Prior to law school, Cameron studied journalism at the University of Toronto, receiving an Honours BA with High Distinction. He has worked for a major Canadian daily newspaper as a writer.

Sepal Bonni, B.Sc., M.Sc., J.D., Trademark Agent - Sepal Bonni is a partner at Carters Professional Corporation, a registered trademark agent and practices in all aspects of brand protection. Her trademark practice includes domestic and foreign trademark prosecution, providing registrability opinions, assisting clients with the acquisition, management, protection, and enforcement of their domestic and international trademark portfolios, and representing clients in infringement, opposition, expungement, and domain name dispute proceedings. She also assists clients with trademark licensing, sponsorship, and co-branding agreements. Sepal also advises clients on copyright and technology law related issues.

Terrance S. Carter, B.A., LL.B, TEP, Trademark Agent – Managing Partner of Carters, Mr. Carter practices in the area of charity and not-for-profit law, and is counsel to Fasken on charitable matters. Mr. Carter is a co-author of *Corporate and Practice Manual for Charitable and Not-for-Profit Corporations* (Thomson Reuters), a co-editor of *Charities Legislation and Commentary* (LexisNexis), a contributing author to *The Management of Nonprofit and Charitable Organizations in Canada,* 5th Edition (LexisNexis), and co-author of *Branding and Copyright for Charities and Non-Profit Organizations* 3rd Edition (LexisNexis) and a Primer for Directors of Not-for-Profit Corporations (Industry Canada). He is recognized as a leading expert by *Lexpert*, *The Best Lawyers in Canada* and *Chambers and Partners.* Mr. Carter is a former member of CRA Advisory Committee on the Charitable Sector, and is a Past Chair of the Canadian Bar Association and Ontario Bar Association Charities and Not-for-Profit Law Sections.

Sean S. Carter, B.A., LL.B. – Sean Carter is a partner with Carters and the head of the litigation practice group at Carters. Sean has broad experience in civil litigation and joined Carters in 2012 after having articled with and been an associate with Fasken (Toronto office) for three years. Sean has been recognized as a leading expert in corporate and commercial litigation by *The Best Lawyers in Canada* since 2021, and by *Lexpert*. Sean has published extensively, co-authoring several articles and papers on anti-terrorism law, including publications in *The International Journal of Not-for-Profit Law*, *The Lawyers Weekly*, *Charity & NFP Law Bulletin* and the *Anti-Terrorism and Charity Law Alert*, as well as presentations to the Law Society of Ontario and Ontario Bar Association CLE learning programs.

Nancy E. Claridge, B.A., M.A., LL.B. – Called to the Ontario Bar in 2006, Nancy Claridge is a partner with Carters practicing in the areas of corporate and commercial law, anti-terrorism, charity, real estate, and wills and estates, in addition to being the assistant editor of *Charity & NFP Law Update*. After obtaining a Master's degree, she spent several years developing legal databases for LexisNexis Canada, before attending Osgoode Hall Law School where she was a Senior Editor of the *Osgoode Hall Law Journal,* Editor-in-Chief of the *Obiter Dicta* newspaper and was awarded the Dean's Gold Key Award and Student Honour Award.

Adriel N. Clayton, B.A. (Hons), J.D. - Called to the Ontario Bar in 2014, Adriel Clayton is a partner at Carters Professional Corporation, manages Carters' knowledge management and research division, and practices in commercial leasing and real estate. Before joining Carters, Adriel practiced real estate, corporate/commercial and charity law in the GTA, where he focused on commercial leasing and refinancing transactions. Adriel worked for the City of Toronto negotiating, drafting and interpreting commercial leases and enforcing compliance. Adriel has provided in-depth research and writing for the *Corporate and Practice Manual for Charitable and Not-for-Profit Corporations*.

Jacqueline M. Demczur, B.A., LL.B. – A partner with the firm, Ms. Demczur practices in charity and not-for-profit law, including incorporation, corporate restructuring, and legal risk management reviews. Ms. Demczur has been recognized as a leading expert in charity and not-for-profit law by *Lexpert, The Best Lawyers in Canada* and *Chambers and Partners*. She is a contributing author to Industry Canada's *Primer for Directors of Not-For-Profit Corporations* and has written numerous articles on charity and not-for-profit issues for the *Lawyers Weekly*, *The Philanthropist* and *Charity & NFP Law Bulletin*, among others. Ms. Demczur is also a regular speaker at the annual *Church & Charity Law Seminar*.

Urshita Grover, H.B.Sc., J.D. – Urshita was called to the Ontario Bar in June 2020 after completing her articles with Carters. Urshita worked as a research intern for a diversity and inclusion firm. Urshita has volunteered with Pro Bono Students Canada and was an Executive Member of the U of T Law First Generation Network. Urshita was able to gain considerable experience in both corporate commercial law as well as civil litigation. Building on this background, Urshita is able to integrate her wide range of experience into a diverse and practical approach to the practice of charity and not-for-profit law for her clients.

Barry W. Kwasniewski, B.B.A., LL.B. – Mr. Kwasniewski is a partner with the firm and joined Carters' Ottawa office in 2008 to practice in the areas of employment law, charity related litigation, and risk management. After practicing for many years as a litigation lawyer in Ottawa, Barry's focus is now on providing advice to charities and not-for-profits with respect to their employment and legal risk management issues. Barry has developed an expertise in insurance law, and has been retained by charities, not-for-profits and law firms to provide legal advice pertaining to insurance coverage matters.

Jennifer M. Leddy, B.A., LL.B. – Ms. Leddy joined Carters' Ottawa office in 2009, becoming a partner in 2014, to practice charity and not-for-profit law following a career in both private practice and public policy. Ms. Leddy has been recognized as a leading expert in charity and not-for-profit law in Canada by *Lexpert*. Ms. Leddy practiced with the Toronto office of Lang Michener prior to joining the staff of the Canadian Conference of Catholic Bishops (CCCB). In 2005, she returned to private practice until she went to the Charities Directorate of the Canada Revenue Agency in 2008 as part of a one-year Interchange program, to work on the proposed "Guidelines on the Meaning of Advancement of Religion as a Charitable Purpose."

Theresa L.M. Man, B.Sc., M.Mus., LL.B., LL.M. – A partner with Carters, Ms. Man practices in the area of charity and not-for-profit law, is ranked by *Lexpert*, *Best Lawyers in Canada*, and *Chambers and Partners*, and received the 2022 OBA AMS/John Hodgson Award of Excellence in Charity and Not-For-Profit Law. She is a co-author of *Corporate and Practice Manual for Charitable and Not-for-Profit Corporations* published by Thomson Reuters. She is a former member of the Technical Issues Working Group of the CRA Charities Directorate, a member and former chair of the CBA Charities and Not-for-Profit Law Section and the OBA Charities and Not-for-Profit Law Section. Ms. Man has also written on charity and taxation issues for various publications.

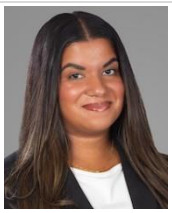
Jefe ("Jay-Fay") Olagunju, LL.B., BL, MBA HRM, is an associate at Carters with a practice focused on charity and not-for-profit law and legal research. She was called to the Ontario Bar in 2025 and to the Nigerian Bar in 2008. Jefe holds an LL.B. from the University of Benin, a BL from the Nigerian Law School, and an MBA with a specialization in Human Resources Management from Edinburgh Business School. Her background in regulatory compliance, combined with volunteer and leadership experience across Nigeria, Scotland, and Canada, provides her with a practical understanding of the governance and operational challenges facing the charitable sector.

Esther S.J. Oh, B.A., LL.B. – A partner with Carters, Ms. Oh practices in charity and not-for-profit law, and is recognized as a leading expert in charity and not-for-profit law by *Lexpert* and *The Best Lawyers in Canada*. Ms. Oh has written numerous articles on charity and not-for-profit legal issues, including incorporation and risk management. Ms. Oh has written articles for *The Lawyer's Daily*, www.carters.ca and the *Charity & NFP Law Bulletin*. Ms. Oh is a regular speaker at the annual *Church & Charity Law Seminar*™ and has been an invited speaker to the Canadian Bar Association, Imagine Canada and various other organizations.

Ryan M. Prendergast, B.A., LL.B. - Mr. Prendergast joined Carters in 2010, becoming a partner in 2018, with a practice focus of providing corporate and tax advice to charities and non-profit organizations. Ryan has co-authored papers for the Law Society of Ontario, and has written articles for *The Lawyers Weekly*, *Hilborn:ECS,* Ontario Bar Association *Charity & Not-for-Profit Law Section Newsletter, Charity & NFP Law Bulletins* and publications on www.carters.ca. Ryan has been a regular presenter at the annual *Church & Charity Law Seminar*™, Healthcare Philanthropy: Check-Up, Ontario Bar Association and Imagine Canada Sector Source. Ryan is recognized as a leading expert by *Lexpert*, *The Best Lawyers in Canada*, and *Chambers and Partners.*

Esther Shainblum, B.A., LL.B., LL.M., CRM – Ms. Shainblum is a partner with Carters, and practices in the areas of charity and not-for-profit law, privacy law and health law. She has been ranked by *Chambers and Partners* and by *Lexpert.* Ms. Shainblum was General Counsel and Chief Privacy Officer for Victorian Order of Nurses for Canada, a national, not-for-profit, charitable home and community care organization. Before joining VON Canada, Ms. Shainblum was the Senior Policy Advisor to the Ontario Minister of Health. Earlier in her career, Ms. Shainblum practiced health law and corporate/commercial law at McMillan Binch and spent a number of years working in policy development at Queen's Park.

Martin U. Wissmath, B.A., J.D. – Called to the Ontario Bar in 2021, Martin joined Carters after finishing his articling year with the firm. In addition to his legal practice, he assists the firm's knowledge management and research division, providing in-depth support for informative publications and client files, covering a range of legal issues in charity and not-for-profit law. His practice focuses on employment law, privacy law, corporate and information technology law, as well as the developing fields of social enterprise and social finance. Martin provides clients with legal advice and services for their social-purpose business needs, including for-profit and not-for-profit organizations, online or off-line risk and compliance issues.



Salina Nathoo, B.A., J.D., Student-at-Law – Salina graduated magna cum laude from the Dual Juris Doctor program at the University of Windsor, Faculty of Law and the University of Detroit Mercy, School of Law in 2025. During her time in law school, Salina served as a Student Attorney at Detroit Mercy Law's Family Law Clinic, preparing pleadings and representing clients before the Wayne County Circuit Court. She also worked for the Alcohol and Gaming Commission of Ontario, conducting legal research and drafting. Prior to attending law school, Salina earned her Honours Bachelor of Arts from York University, majoring in Criminology and Law and Society.

Acknowledgements, Errata and other Miscellaneous Items

Links not Working: If the above links do not work from your mail program, simply copy the link text and paste it into the address field of your internet browser.

Get on Our E-Mailing List: If you would like to be added to our electronic mailing list and receive regular updates when new materials are added to our site, click here or send an email to info@carters.ca with "Subscribe" in the subject line. Feel free to forward this email to anyone (internal or external to your organization) who might be interested.

Privacy: We at Carters know how important your privacy is to you. Our relationship with you is founded on trust and we are committed to maintaining that trust. Personal information is collected solely for the purposes of establishing and maintaining client lists; representing our clients; and to establish and maintain mailing lists for the distribution of publications as an information service. Your personal information will never be sold to or shared with another party or organization. For more information, please refer to our Privacy Policy.

Disclaimer: This is a summary of current legal issues provided as an information service by Carters Professional Corporation. It is current only as of the date of the summary and does not reflect subsequent changes in the law. The summary is distributed with the understanding that it does not constitute legal advice or establish the solicitor/client relationship by way of any information contained herein. The contents are intended for general information purposes only and under no circumstances can be relied upon for legal decision-making. Readers are advised to consult with a qualified lawyer and obtain a written opinion concerning the specifics of their particular situation.

Carters Professional Corporation

PARTNERS:
Terrance S. Carter B.A., LL.B. tcarter@carters.ca
(Counsel to Fasken)
Jane Burke-Robertson B.Soc.Sci., LL.B. (1960-2013)
Theresa L.M. Man B.Sc., M.Mus., LL.B., LL.M. tman@carters.ca
Jacqueline M. Demczur B.A., LL.B. jdemczur@carters.ca
Esther S.J. Oh B.A., LL.B. estheroh@carters.ca
Nancy E. Claridge B.A., M.A., LL.B. nclaridge@carters.ca
Jennifer M. Leddy B.A., LL.B. jleddy@carters.ca
Barry W. Kwasniewski B.B.A., LL.B. bwk@carters.ca
Sean S. Carter B.A., LL.B. scarter@carters.ca
Ryan M. Prendergast B.A., LL.B. rprendergast@carters.ca
Sepal Bonni B.Sc., M.Sc., J.D. sbonni@carters.ca
Esther Shainblum B.A., LL.B., LL.M., CRM eshainblum@carters.ca
Adriel N. Clayton B.A. (Hons), J.D. aclayton2@carters.ca

ASSOCIATES:
Martin U. Wissmath B.A., J.D. mwissmath@carters.ca
Cameron A. Axford, B.A. (Hons.), J.D. caxford@carters.ca
Urshita Grover, H.B.Sc., J.D. ugrover@carters.ca
Jefe Olagunju, LL.B., BL, MBA HRM jolagunju@carters.ca

STUDENT-AT-LAW
Salina Nathoo, B.A., J.D. snathoo@carters.ca

Orangeville Office
211 Broadway, P.O. Box 440
Orangeville, Ontario, Canada
L9W 1K4
Tel: (519) 942-0001
Fax: (519) 942-0300

Ottawa Office
117 Centrepointe Drive, Suite 350
Nepean, Ontario, Canada
K2G 5X3
Tel: (613) 235-4774
Fax: (613) 235-9838

Toronto Office
67 Yonge Street, Suite 1402
Toronto, Ontario, Canada
M5E 1J8
Tel: (416) 594-1616
Fax: (416) 594-1209