



Brown's Economic Damages Newsletter

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Brown Economic offers 5 user-friendly, economic loss calculators for quick, accurate, and cost-effective damages estimates, available @ www.browneconomic.com:

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Cara Brown's testimony accepted in *Adams V. Canada (Attorney General)*, 2015 ABQB 527

By Cara L. Brown, M.A. and Geni Peters, Ph.D.

A recent case decided in Alberta accepted the evidence of Cara Brown regarding the loss suffered due to injuries incurred in an assault. Ms. Brown's quantum evidence for the defense was accepted in lieu of the plaintiff's expert evidence.

Summary

***Adams v. Canada (Attorney General)*, 2015 ABQB 527:** personal injury case involving a Correctional Services of Canada (CSC) inmate who was assaulted by another inmate in the medium security facility at Drumheller, Alberta in 2007. Justice Dario found that the CSC did not breach the applicable standard of care for medium security facilities and was not liable in negligence for the assault on Mr. Adams, nor for failing to find Mr. Adams more quickly after the assault. Although the plaintiff failed in his claim, Dario J. determined that, had his claim been successful, no award for loss of past or future income would have been assessed.

Dario J relied on information specific to the plaintiff's labour force and income characteristics and statistical research regarding individuals with similar characteristics in her determination of what damages would have been in the event that the plaintiff's claim was upheld. The information provided by Ms. Brown on behalf of the defense is highlighted in the paragraphs below.

[142] Mr. Adams asserts that, without the assault, he would have remained in Alberta after his release and returned to the oil patch. The strongest evidence of his intent, however, is the letter he wrote to his mother earlier in the day of the incident stating he wanted to return to Newfoundland and perhaps start a family. I find that he would have returned to Newfoundland after his

release from the Drumheller Institution. ***I further note that Mr. Adams' entire work experience in the oil patch was two months in Grande Prairie, and that he quit that job to stock shelves at Wal-Mart with his friend.*** There is little evidence to support his assertion that he would have returned to this type of position (emphasis added).

[143] Mr. Adams' prior work history in general does not support his claim. ***He acknowledges his annual earnings from 2001-2005 never went above \$4,755. He points, however, to his 2006 income, which jumped to \$15,418. This increase was due largely to the two-month period Mr. Adams worked in the oil patch.*** I note that after leaving his brief employ in the oil and gas sector, Mr. Adams' income was from dealing crack cocaine, at an estimated income of \$3,000 per day (emphasis added).

[145] The Defendant argues that Mr. Adams has not experienced a loss of income and will not. ***In support of this position, the Defendant notes Mr. Adams' variable and sporadic work history, primarily in minimum wage positions. Some years Mr. Adams reported no income at all. Even factoring in his 2006 income, his average pre-incident annual earnings are \$4,000. His average annual income post-incident is \$7,000.*** The Defendant argues Mr. Adams had no record of ambition or industry, only of criminal activity and addiction – both of which spiralled out of control in 2006-2007. Mr. Adams' own testimony supports these assertions (emphasis added).

[146] Mr. Adams' assumptions are not representative either of his work history or of his reasonable income projections. While I agree with Mr. Adams that labour market experiences for individuals aged 20-26 may be sporadic, ***his income was more than 70% lower than the average in his age category.*** Thus, attributing "average income" to Mr. Adams is not reflective of his work history (emphasis added).

The judge determined that ***"Based on Mr. Adams' sporadic pre-incident work history and his criminal record, I find he has not established a loss of past income"*** (para [150], emphasis added).

[148] The relevant period for determining loss of past income is the period that commences after Mr. Adams' release date (assuming he was paroled) plus some time thereafter to find suitable employment, and ends on the first date of trial, being June 9, 2014. Mr. Adams suggests he would have found employment six months after parole, being September 9, 2008. ***The Defendant states that six months is the average and that it likely would have taken longer for Mr. Adams*** (emphasis added).

[149] Mr. Adams claims lost income in the range of \$53,000 to \$215,000, depending on the assumptions employed. ***The Defendant argues an amount of zero is more appropriate*** (emphasis added).

[150] ***Based on Mr. Adams' sporadic pre-incident work history and his criminal record, I find he has not established a loss of past income. After release from the Drumheller Institution, he received social assistance payments between \$6,469 and \$11,411 in each year from 2008-2011, then worked part-time in 2012-2013 in some training/entry-level jobs. On October 7, 2013, he commenced working 32 hours per week as a light duty cleaner at a rate of \$12/hr. His income for these years is above his historical earning pattern*** and he has provided no evidence that it is out of line with re-entry into the workforce (emphasis added).

[151] ***The Defendant argues that, given Mr. Adams' work history, he has not established a reasonable possibility of loss of future income.*** In fact, the incident may have actually motivated an improvement in Mr. Adams' lifestyle and legitimate income earning, leading him out of the crack cocaine subculture (emphasis added).

The judge determined that the plaintiff had not "established a future income loss as a 'real and substantial possibility' (*Athey* at para 44), ***given his pre-incident work history and his previous income that was so markedly below the average for his peers***" (para [152], emphasis added).

[153] Although I have found no loss of future income has been established, had I not made such a determination, the following are my findings had Mr. Adams established future loss as a reasonable possibility. There are problems with the assumptions relied on by each of the economic experts. Mr. Adams' expert assumed him to be an average full-time employee and compared him against certain laborer groups. ***The Defendant's expert assumed future work parameters that are more realistic***, but it is not clear whether the discount rate she used (based on a "mild disability" reduction of 16%) was appropriate (emphasis added).

[154] ***Of the two economic experts, I prefer both the assumptions relied upon and the methodology used by the Defendant's expert, for various reasons.*** Regarding methodology for example, Mr. Adams' expert made allowances for real growth for "without incident" income, but held the "with incident" income at a no growth constant dollar amount. Mr. Adams contests the method by which the Defendant's expert arrived at the level of disability to apply in her calculations. Nevertheless, ***I find that the Defendant's expert evidence is preferable*** even taking into account this concern. In coming to this conclusion, I must balance Mr. Adams' objection against the Defendant's argument, supported by Dr. King, that some of Mr. Adams' residual issues – such as memory problems and other mental and cognitive functional difficulties – may be attributable to his crack cocaine and marijuana addictions rather than to the attack. ***I accept that a mild disability rating is acceptable in light of the Plaintiff's evidentiary issue*** (emphasis added).

[155] Assuming Mr. Adams moved to Newfoundland and completed Grade 12, ***his loss of income under the Defendant's model would be \$53,465***, plus pre-judgment interest (emphasis added).

The loss of income cited in para [155] is consistent with Brown Economic's scenario A2 vs. B1, which assumed that Mr. Adams' *without*-incident income would be consistent with salaries of individuals with similar demographic characteristics employed across all levels of work activity.

The Importance of Tailoring the Quantum Assessment to the Plaintiff

In reaching her determination of potential damages, Dario J. relied on information regarding the plaintiff's demonstrated labour force and income characteristics, as well as statistical research regarding individuals with similar characteristics, noting that:

[140] Assessing loss of income is highly speculative. ***To assess appropriately Mr. Adams' loss of income, I must rely on factors relevant to his particular situation*** and on certain assumptions regarding his future (emphasis added).

In this case, the plaintiff's expert provided **no** review of Mr. Adams' education, employment and income history, nor did they comment on or provide a review of statistical earnings for "elementary positions" in which Mr. Adams would be capable of obtaining employment.

In contrast, Brown Economic provided:

- a detailed review of the plaintiff's education, employment and income history;
- earnings of men with Mr. Adams' demographic characteristics employed across all occupations and in occupations in which the plaintiff could obtain employment, on a full-time, full-year basis and across all levels of work activity;
- research which indicated that workers with substance abuse problems experience higher rates of unemployment, are less likely to be employed full-time, have higher rates of absenteeism and are less productive in the workplace;¹ and
- research on the impact of incarceration on earnings.

The Plaintiff's Demonstrated Labour Force and Income Characteristics

In a detailed review of the plaintiff's education, employment and income history,² Brown Economic noted the following about the plaintiff's activities prior to the October 2007 incident:

- he had not completed high school;
- he had lived primarily in Newfoundland over an approximate 7 to 8 year period after leaving high school;
- he had not demonstrated strong labour force attachment;³
 - he was never employed at a full-time full-year level of work activity before 2007;
 - he had been employed predominantly in a number of entry level, minimum wage occupations;
 - he had been out of work voluntarily for over a year prior to his sentencing for drug possession and trafficking in September 2007;
- he had only worked as an oil and gas labourer in Alberta for approximately two months before quitting his job;

¹ See Janikowski, Timothy P., *Research on Employment and Substance Abuse Treatment*, University at Buffalo-SUNY and the United Nations Office on Drugs and Crime's *Economic and Social Consequences of Drug Abuse and Illicit Trafficking*, January 1, 1998 (www.unodc.org).

² Based on Mr. Adams' personal income tax returns, T4s, T5007s, *Notice of Assessments* and information contained in the plaintiff expert's report.

³ According to Skrypnek, B.J. and J.E. Fast, *Trends in Canadian Women's Labour Force Behavior: Implications for Government and Corporate Policy* (prepared for The Status of Women Canada's Economic Equality Workshop, Ottawa, November 29-30, 1993), "labour force attachment" is defined as the "extent to which one is continuously employed over their employment life span...or, as the extent to which one is continuously employed throughout a given year, that is, the hours per week and weeks per year worked" (p. 338).

- he was apparently unable to work in the military due to criminal convictions;
- his pre-incident employment and earnings were negatively impacted by substance abuse issues and criminal behavior, resulting in his incarceration in October 2007;
- his average pre-incident earnings were minimal and were approximately -70% to -79% lower in comparison to the earnings of his peers; and
- he indicated that upon parole he intended to return to Newfoundland to reside with his common-law wife and look for employment in the construction industry.

The information provided confirmed that Mr. Adams worked sporadically prior to the incident, with earnings averaging approximately \$4,000 (in 2007 dollars) while employed solely in Newfoundland prior to 2006, and \$5,500 (in 2007 dollars) over the entire period of his employment prior to his sentencing for drug possession and trafficking on September 19, 2007.

We further noted that Mr. Adams' average pre-incident earnings over the entire period of his employment prior to his sentencing for drug possession and trafficking on September 19, 2007 were approximately -85% to -90% lower than the earnings attributed to him by the plaintiff's expert in their *without*-incident scenarios.

Further, our review of the plaintiff's education, employment and income history noted the following about the plaintiff's activities after the October 2007 incident:

- he completed the requirements for a high school diploma;
- he continued to work in lower-paying, entry level, labor-intensive jobs, predominantly as a cleaner/caretaker;
- he was employed 32 hours per week at an hourly wage of \$12;
- his social assistance payments over the period 2008 to 2011 exceeded his average pre-incident earnings; and
- he allegedly received a settlement from the Alberta Government pertaining to the October 2007 incident in October 2011.

Mr. Adams' average post-incident earnings (\$7,000 in 2007 dollars) since returning to paid employment in 2012 also exceeded his average pre-incident level of earnings.

Statistical Research Regarding Individuals with Similar Characteristics

Statistical Benchmark Salaries

Brown Economic tailored statistical benchmark salaries to Mr. Adams' demonstrated labour force, income and demographic characteristics:

- Mr. Adams did not complete his high school diploma requirements until after the October 2007 incident; thus, we provided earnings for both high school graduates and non-high school graduates.

- Mr. Adams had derived the majority of his employment income from work in Newfoundland prior to the age of 25 and he indicated an intention to return to Newfoundland following incarceration; thus, we provided earnings for men in Newfoundland.
- Mr. Adams was deemed to be capable of full-time, full-year employment, but had worked less than full-time, full-year most years; thus, we provided earnings for both full-time, full-year employment as well as earnings for all levels of work activity (including full-time full-year, part-time part-year, full-time part-year, and part-time full-year employment).

Using these statistical benchmarks, we were able to show that:

- Mr. Adams' average pre-incident earnings were approximately -70% to -79% less than the average starting salaries of workers with similar demographic characteristics employed full-time, full-year.
- Mr. Adams' average pre-incident earnings while employed solely in Newfoundland remained lower than the average starting benchmark salaries (by approximately -33% to -56%) for workers with similar demographic characteristics employed across all levels of work activity.
- Mr. Adams' average earnings prior to his sentencing in September 2007 (including his employment in Alberta) were similar to, albeit lower overall than, the earnings of 15- to 24-year-old non-high school graduates employed across all levels of work activity.
- Mr. Adams' average pre-incident earnings were lower than the earnings reported by construction labourers, cleaners, grocery store clerks/stock persons and material handlers employed across all levels of work activity and on a full-time, full-year basis.
- Mr. Adams' average post-incident earnings fell within the range of average starting salaries reported by workers with similar demographic characteristics employed full-time, full-year.
- Mr. Adams' average post-incident earnings were similar to the average starting salaries reported by cleaners, grocery store clerks/stock persons and material handlers employed across all levels of work activity.

Research on Employment of Workers with Criminal Convictions

Research shows that while on conditional release⁴ from prison, the **median** time for men and women to find work is 6 months and 10 months, respectively.⁵ Further, not only can a criminal conviction result in lost earnings while incarcerated, prior convictions can have a negative effect on earnings while in the labour market after incarceration. Specifically, the ability to find suitable employment may be reduced for a variety of supply-based reasons, including the fact that, during incarceration, skills (human capital) depreciate, information about the job market weakens and the individual's work network deteriorates. These negative effects are compounded by demand-based reasons due to the fact that incarceration almost certainly limits the interests of employers in hiring previous offenders. For example:

⁴ Conditional release includes day parole and full parole. Correctional Service Canada, "Types of Release", available online at <http://www.csc-scc.gc.ca>.

⁵ Christa A. Gillis and Mark Nafekh, "The impact of community-based employment on offender reintegration", *FORUM on Corrections Research*, vol. 17, no. 1, June 2005.

- the likelihood of obtaining employment is negatively correlated with the presence of a criminal record;⁶
- incarceration has been associated with a -14% to -26% reduction in hourly wages;⁷
- previous convictions have a negative effect on the types of careers available to offenders upon re-entering the labour market;⁸ and
- following their release from prison, approximately two-thirds of offenders (64.4%) reported working in unskilled jobs.⁹

Scenarios Provided to the Court

The Plaintiff Expert's Scenarios

Based on instruction from counsel, the plaintiff's expert assumed Mr. Adams would have returned to the labour force immediately upon his eligibility for parole. Further, ***based on instruction from counsel***, the plaintiff's expert assumed that, after Mr. Adams' incarceration, absent the incident he would have earned an income consistent with that of a high school graduate employed across all occupations on a full-time full-year basis in Alberta or as an oil and gas labourer employed on a full-time full-year basis in Alberta. With respect to Mr. Adams' *post*-incident earning capacity, ***based on instruction from counsel***, the plaintiff's expert assumed he would be restricted to employment in elementary positions earning either \$12 per hour or \$15 per hour.

Brown Economic's Main Scenario

In our main scenario we assumed Mr. Adams had **not** experienced a potential loss of income, despite any alleged symptoms arising from the October 1, 2007 incident, because:

- his earnings had not declined since that time, and
- it was our understanding he remained capable of working full-time in jobs similar in nature to positions characteristic of his pre-incident employment.

Brown Economic's Illustrative Scenarios

To emphasize differences in assumptions between experts, we also provided a sensitivity analysis in which we estimated Mr. Adams' potential income loss based on the assumption that the October 2007 incident may have had a negative impact on his potential future earning capacity.

⁶ See Janikowski, Timothy P., *Research on Employment and Substance Abuse Treatment*, University at Buffalo-SUNY.

⁷ Amanda Geller, Irwin Garfinkel and Bruce Western, *The Effects of Incarceration on Employment and Wages An Analysis of the Fragile Families Survey*, Center for Research on Child Wellbeing Working Paper # 2006-01-FF, Revised August 2006.

⁸ Harry J. Holzer, *Collateral Costs: The Effects of Incarceration on Employment and Earnings Among Young Men*, Institute for Research on Poverty, October 2007.

⁹ Christa A Gillis and D. A. Andrews, *Predicting Community Employment for Federal Offenders on Conditional Release*, Research Branch Correctional Service Canada, January 2005 at p. 23.

In estimating Mr. Adams' potential income loss, we made the following assumptions for the *without*-incident scenarios:

- Mr. Adams would have been granted day parole on March 19, 2008 and full parole on May 19, 2008;
- during the period of his incarceration and search for work, we assumed Mr. Adams would have completed his high school diploma and work re-entry courses as demonstrated post-incident.
- after an approximate six-month job search, consistent with the time it typically takes men to obtain work upon conditional release from prison, we assumed he would have returned to Newfoundland as per his stated intentions and commenced employment by September 19, 2008.

Without-incident scenario A1: We assumed that, upon his return to work in September 2008, he would have earned an amount consistent with the average starting earnings of high school graduates employed on a full-time full-year basis in Newfoundland based on *2006 Census* data. We assumed Mr. Adams' earnings would have peaked by age 55, at which point they would have been consistent with the overall average earnings of high school graduates employed on a full-time full-year basis in Newfoundland. We did not assume that Mr. Adams would have attained the peak level of earnings of a high school graduate, given his delay in completion of a high school diploma, as well as the potential negative impact his criminal convictions may have had on his employability.

Based on Mr. Adams' social, work and income history, research pertaining to the impact of criminal activity, substance abuse and smoking on employability and earnings, as well as the fact that Mr. Adams did not work on a full-time full-year basis before the incident, we also provided a second *without*-incident scenario based on the assumption he would have continued to work sporadically in lower paying, elemental occupations.

Without-incident scenario A2: We assumed that upon returning to the labour force in September 2008, Mr. Adams would have earned an amount consistent with the earnings of 15- to 24- year-old high school graduates employed across all occupations and levels of work activity in Newfoundland. We assumed that Mr. Adams' earnings would peak by age 55, at which point he would have earned an amount consistent with the overall average earnings of high school graduates employed across all occupations and all levels of work activity in Newfoundland. Similar to *without*-incident scenario A1, we assumed Mr. Adams would have attained the overall average level of earnings of a high school graduate but not the peak level.

With-incident scenario B1: To estimate Mr. Adams' potential past loss of income, we assumed Mr. Adams' post-incident earnings from 2007 to 2013 would be consistent with his actual earnings, and that he would earn an amount in 2014 consistent with his wage at his place of employment. To estimate Mr. Adams' potential future loss of income, from January 1, 2015 onward, applying HALS/PALS analysis, we assumed Mr. Adams' lifetime earnings would be reduced by -16%, consistent with that of an individual with a "mild" disability. We supported our choice of HALS/PALS reduction by noting that the earnings implied by the -16% reduction in Mr. Adams' lifetime earnings fell within the range of earnings reported by cleaners, grocery clerk/stock persons and material handlers employed on a full-time full-year basis in Newfoundland - occupations which we understood Mr. Adams may have been capable of performing post-incident.

A Note on the Application of Negative Contingencies

In all scenarios, the plaintiff's expert applied an unemployment contingency to Mr. Adams' assumed earnings based on 2006 Census data for Alberta males matching Mr. Adams' "age and assumed education level" (high school diploma). We opined that this *overstated* the losses, given Mr. Adams' intention to remain in Newfoundland, as unemployment rates are significantly higher in Newfoundland in comparison to Alberta. For example, according to the 2006 Census, **the unemployment rate for male high school graduates of all ages in Alberta was 4.2%, while the unemployment rate for male high school graduates of all ages in Newfoundland was 20.8%.**

We also opined that the plaintiff's expert *overstated* the losses by not applying an **occupation-specific unemployment contingency** in their *without*-incident A2 scenario (oil and gas labourer in Alberta), as unemployment rates are significantly higher for oil and gas labourers in Alberta in comparison to high school graduates employed across all occupations. For example, according to the 2006 Census, the unemployment rate for male high school graduates of all ages in Alberta was 4.2%, while the unemployment rate for oil and gas labourers of all ages in Alberta was 13.2%.

Although the plaintiff in this case was male, Brown Economic applied **non-participation** and **part-time contingencies** to Mr. Adams' assumed earnings in *without*-incident scenario A1 to take into account the possibility he may not have worked on a full-time full-year basis – which may have been likely based on a review of the plaintiff's pre- and post-incident work history, as well as research pertaining to the impact of factors such as criminal behavior, substance abuse and smoking on employability.

Brown Economic also applied an unemployment contingency to Mr. Adams' assumed earnings in *without*-incident scenario A2. We did not apply a non-participation or part-time contingency in this scenario, as we assumed that non-participation and part-time activity (i.e. voluntary withdrawals from the workplace and the possibility of part-time work) are incorporated in the use of the "all work activity" earnings data.

Implications for Quantum Assessments

The judgement in *Adams v. Canada (Attorney General)* highlights the importance of reviewing the plaintiff's education, employment and income history in detail and generating quantum assessments based on assumptions consistent with the plaintiff's own characteristics and statistical research regarding individuals with similar characteristics.

In this case, evidence supported the following plaintiff-specific assumptions:

- the plaintiff experienced no past loss of income, given his sporadic pre-incident work history and criminal record;
- absent the incident, the plaintiff would have experienced an approximate six-month job search, consistent with the time it typically takes men to obtain work upon conditional release from prison;
- the plaintiff's *without*-incident earnings would be consistent with statistical benchmark salaries based on all levels of work activity (rather than for full-time, full-year workers), given that the plaintiff had worked less than full-time, full-year most years;

- although the plaintiff would return to the workforce after parole at age 27, the plaintiff's *without*-incident earnings would be consistent with average salaries for 15- to 24- year-olds (rather than average salaries for individuals of all ages), given that his pre-incident income was more than 70% lower than the average in his age category;
- the plaintiff's without-incident earnings would peak at levels consistent with overall average salaries (rather than average peak salaries) for high school graduates with similar demographic characteristics, given his delay in completion of a high school diploma, as well as the potential negative impact his criminal convictions may have had on his employability; and
- the appropriate HALS/PALS reduction in lifetime earnings would be -16%, consistent with a 2006 PALS "mild" disability, given that some of the plaintiff's residual issues may be attributable to his substance abuse rather than to the incident.

UPDATING NON-PECUNIARY AWARDS FOR INFLATION (JULY 2015, CANADA)

Year of Accident/ Year of Settlement or Trial	"Inflationary" Factors*	Non-Pecuniary Damages - Sample Awards				
		\$10,000	\$25,000	\$50,000	\$75,000	\$100,000
July 2014-July 2015	1.014	\$10,143	\$25,356	\$50,713	\$76,069	\$101,426
Avg. 2013-July 2015	1.025	\$10,252	\$25,629	\$51,258	\$76,887	\$102,516
Avg. 2012-July 2015	1.035	\$10,348	\$25,869	\$51,738	\$77,607	\$103,476
Avg. 2011-July 2015	1.050	\$10,505	\$26,262	\$52,524	\$78,786	\$105,048
Avg. 2010-July 2015	1.081	\$10,811	\$27,026	\$54,053	\$81,079	\$108,105
Avg. 2009-July 2015	1.100	\$11,003	\$27,508	\$55,016	\$82,524	\$110,032
Avg. 2008-July 2015	1.106	\$11,055	\$27,639	\$55,277	\$82,916	\$110,554
Avg. 2007-July 2015	1.130	\$11,297	\$28,244	\$56,487	\$84,731	\$112,974
Avg. 2006-July 2015	1.154	\$11,539	\$28,847	\$57,693	\$86,540	\$115,387
Avg. 2005-July 2015	1.177	\$11,769	\$29,424	\$58,847	\$88,271	\$117,695
Avg. 2004-July 2015	1.203	\$12,030	\$30,076	\$60,152	\$90,228	\$120,304
Avg. 2003-July 2015	1.225	\$12,254	\$30,635	\$61,270	\$91,905	\$122,540
Avg. 2002-July 2015	1.259	\$12,592	\$31,481	\$62,961	\$94,442	\$125,923
Avg. 2001-July 2015	1.288	\$12,877	\$32,192	\$64,384	\$96,576	\$128,769
Avg. 2000-July 2015	1.320	\$13,201	\$33,002	\$66,004	\$99,007	\$132,009
Avg. 1999-July 2015	1.356	\$13,561	\$33,901	\$67,803	\$101,704	\$135,606
Avg. 1998-July 2015	1.380	\$13,795	\$34,488	\$68,977	\$103,465	\$137,953
Avg. 1997-July 2015	1.393	\$13,933	\$34,832	\$69,664	\$104,495	\$139,327
Avg. 1996-July 2015	1.416	\$14,158	\$35,396	\$70,792	\$106,187	\$141,583
Avg. 1995-July 2015	1.438	\$14,381	\$35,954	\$71,907	\$107,861	\$143,815
Avg. 1994-July 2015	1.469	\$14,690	\$36,726	\$73,451	\$110,177	\$146,902
Avg. 1993-July 2015	1.471	\$14,714	\$36,786	\$73,571	\$110,357	\$147,143
Avg. 1992-July 2015	1.499	\$14,989	\$37,473	\$74,946	\$112,420	\$149,893
Avg. 1991-July 2015	1.521	\$15,212	\$38,030	\$76,060	\$114,090	\$152,120
Avg. 1990-July 2015	1.607	\$16,068	\$40,170	\$80,341	\$120,511	\$160,681
Avg. 1989-July 2015	1.684	\$16,837	\$42,093	\$84,187	\$126,280	\$168,374
Avg. 1988-July 2015	1.768	\$17,677	\$44,191	\$88,383	\$132,574	\$176,765
Avg. 1987-July 2015	1.839	\$18,386	\$45,966	\$91,932	\$137,898	\$183,864
Avg. 1986-July 2015	1.919	\$19,188	\$47,969	\$95,939	\$143,908	\$191,877
Avg. 1985-July 2015	1.999	\$19,992	\$49,980	\$99,960	\$149,940	\$199,921
Avg. 1984-July 2015	2.078	\$20,784	\$51,960	\$103,920	\$155,881	\$207,841
Avg. 1983-July 2015	2.168	\$21,679	\$54,197	\$108,394	\$162,590	\$216,787
Avg. 1982-July 2015	2.295	\$22,951	\$57,378	\$114,756	\$172,134	\$229,511
Avg. 1981-July 2015	2.542	\$25,421	\$63,552	\$127,105	\$190,657	\$254,210
Avg. 1980-July 2015	2.860	\$28,596	\$71,491	\$142,982	\$214,473	\$285,964
Avg. 1979-July 2015	3.149	\$31,493	\$78,733	\$157,466	\$236,199	\$314,932
Jan. 1978-July 2015	3.587	\$35,872	\$89,679	\$179,359	\$269,038	\$358,718

\$91,932 = \$50,000 x 1.839 represents the dollar equivalent in July 2015 of \$50,000 based on inflation increases since 1987. Similarly, \$358,718 (= \$100,000 x 3.587) represents the dollar equivalent in July 2015 of \$100,000 in 1978 based on inflationary increases since the month of January 1978.

* Source: Statistics Canada, Consumer Price Index, monthly CPI release, rolling average (except for Jan. 1978).

Consumer Price Index		Unemployment Rate	
From July 2014 to July 2015*		For the month of July 2015	
(rates of inflation)			
Canada**	1.3%	Canada:	6.8%
Vancouver:	1.1%	Vancouver:	6.0%
Toronto:	1.8%	Toronto:	6.6%
Edmonton:	1.3%	Edmonton:	5.7%
Calgary:	1.3%	Calgary:	6.6%
Halifax:	1.1%	Halifax:	6.1%
St. John's, NF:	0.6%	St. John's, NF:	6.3%
Saint John, NB:	1.1%	Saint John, NB:	8.2%
Charlottetown:	0.1%	Charlottetown (PEI):	11.6%

* Using month-over-month indices. Source: Statistics Canada

** 12 month rolling average up to July 2015 is 1.4% (see table above).



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