

THE SIXTH ANNUAL

CICA National Conference on Income Taxes 2007

Announcing the CICA's SIXTH National Conference on Income Taxes – a program of real relevance to the professional tax advisor in Canada

October 15-17, 2007 at the Sheraton Centre Toronto Hotel, Toronto, ON



FOR 2007 – a tremendous professional development opportunity at Canada's leading income tax conference for practical tax information and knowledge – the logical choice for all practitioners serving owner-managers and their businesses. Tailor the tax education that's right for you from 20 different sessions in multiple subject areas plus four in-depth, practical workshops, you will find sessions that best suit your specific requirements.

THE 2007 CONFERENCE SPONSORS & EXHIBITORS

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EXHIBITORS



TIMETABLE AT A GLANCE

DAY 1 – Monday, October 15, 2007

7:30 – 8:30	BREAKFAST		EXHIBITS OPEN
8:30 – 9:30	OPENING REMARKS AND KEYNOTE ADDRESS The Inimitable Rex Murphy – A Uniquely Canadian Perspective		
9:30 – 10:30	An Update on Recent Tax Cases and Assessing Positions <i>Ed Kroft, McCarthy Tétrault LLP, Vancouver</i>		
10:30 – 11:00	COFFEE BREAK		EXHIBITS OPEN
	CONCURRENT SESSIONS		
11:00 – 12:15	The Cross Border Employee <i>Cathy McGill, PricewaterhouseCoopers LLP, Toronto</i>	Employee Stock Options in Private Companies <i>Michael Fremes, Vottero Fremes McGrath & Yee, Mississauga</i>	Knowing Life Insurance Tax for Your Clients – Practical Issues <i>Gail Grobe, Manulife Financial, Waterloo</i>
12:15 – 1:30	NETWORKING LUNCH Presentation of CICA Award for Excellence in Income Tax Practice and Education		Sponsored by: 
1:30 – 2:45	2007 CRA Roundtable		
2:45 – 3:00	COFFEE BREAK		EXHIBITS OPEN
3:00 – 4:15	Inbound Foreign Investments <i>James Creaser, Grant Thornton LLP, Halifax</i>	Executive Compensation Strategies in Private Companies	The Principal Residence Rules <i>Ken Laloge, Mackay LLP, Kelowna</i>
4:15 – 5:30	Taxation of Dividends <i>Bruce Ball, BDO Dunwoody LLP, Toronto</i>		
5:30 –	NETWORKING RECEPTION AND EVENT <i>Hosted by Exhibitors</i>		    

DAY 2 – Tuesday, October 16, 2007

8:00 – 9:00	BREAKFAST		EXHIBITS OPEN
9:00 – 10:30	OPENING REMARKS 2007 Tax Update – Kais Aziz, BDO Dunwoody LLP, Mississauga		
10:30 – 11:00	COFFEE BREAK		EXHIBITS OPEN
	CONCURRENT SESSIONS		
11:00 – 12:15	Professional Corporations <i>David Thompson, Thorsteinssons LLP, Vancouver, Dan Warren, Hendry Warren LLP, Ottawa</i>	Soft Issues of Succession Planning <i>Grant Robinson, The SuccessCare Program, Guelph</i>	Charitable Gifting <i>Chris Dobbin, BMO Harris Private Banking, Halifax</i>
12:15 – 1:45	NETWORKING LUNCH – featuring the unique comedic talents of Glen Foster		
1:45 – 3:00	Employee Taxable Benefits <i>Hugh Neilson, Veres Picton & Co. LLP, Edmonton</i>	Personal Succession Planning and Hiring/Retention for the Tax Practitioner <i>Carolyn Cohen, Training and Human Resource Consulting, Toronto</i>	Overview of Estate Freezing
3:00 – 3:30	COFFEE BREAK		EXHIBITS OPEN
3:00 – 4:15	Current GST and PST Issues for the Income Tax Practitioner <i>Kal Ruprai, BDO Dunwoody LLP, Toronto</i>	Life Cycle of a Business – Tax Issues to Consider <i>Heath Moore, Grant Thornton LLP, Halifax</i>	Tax Purposes Business Valuations <i>Richard Wise, Wise Blackman LLP, Montreal</i>

DAY 3 – Wednesday, October 17, 2007 (Workshops)

8:00 – 9:00	BREAKFAST	
9:00 – 12:00	Purchase/Sale/Succession in a Business <i>Workshop leaders: Keith MacIntyre, Kevin Fraser, Grant Thornton LLP, Dartmouth</i>	Estate Freezes <i>Workshop leaders: TBA</i>
12:00 – 1:00	LUNCH BREAK	
1:00 – 4:00	The Taxation of Dividends <i>Workshop leader: Fred Richardson, BDO Dunwoody LLP, Oakville</i>	Exit Strategies for the Owner-Manager: Avoiding the Profit and Distribution Trap <i>Workshop leader: Peter Merrick, Merrick.wealth.com, Toronto</i>

CICA's 2007 National Conference on Income Taxes:

a full conference featuring five comprehensive general sessions, 18 concurrent sessions in three tracks and our very popular, in-depth, practical workshops.



2007 Conference Advisory Committee

Tina Di Vito, BMO Nesbitt Burns, Toronto

Jeff Hlynski, Withey Addison LLP, Mississauga

Ken Karakashian, BDO Dunwoody LLP, Mississauga

Steve Johnston, The Canadian Institute of Chartered Accountants, Toronto

Ken Laloge, Mackay LLP, Kelowna

Heath Moore, Grant Thornton LLP, Halifax

Dan Warren, Hendry Warren LLP, Ottawa

Who should be here:

All small to medium-sized tax practitioners in both public practice and industries like financial services, wealth management, mutual funds and life insurance.

Features:

General sessions:

- **Keynote address from one of Canada's most acerbic political commentators** – hear Rex Murphy skewer Canadian institutions with his sarcastic intellect and deep insight into unique Canadian issues
- **Recent Tax Cases and Assessing Positions** – Ed Kroft deals with the most important tax case issues affecting tax practitioners in 2007 – hear this legal expert explain in simple language the impact of cases on your clients and the legal perspectives you need to bring to your practice
- **Taxation of Dividends**: this elemental part of almost everyone's income faces new rules and new opportunities for tax saving and planning – hear how you can manage this area in the most tax advantageous ways for your clients
- **The 2007 Tax Update** – an Update on the Latest Tax Issues, review of the 2007 budget proposals plus a look at Current Tax Cases: an in-depth discussion about the latest legislative developments and the most important changes in Federal Income Tax rules over the last year given by one of the country's top tax experts
- **The CRA Roundtable**: Another popular annual feature, you will learn about the latest CRA practices and policies as senior CRA representatives discuss the latest policy activities and initiatives at the Agency – and get to ask your most pressing questions ahead of time for a quick response from the CRA team

Workshops:

Choose from this selection of full and half-day seminars:

- Taxation of Dividends
- Estate Freezing
- Purchase, Sale and Succession in a Business
- Exit Strategies for the Owner-Manager: Avoiding the Profit and Distribution Trap

A distinctive and practical multi-tracked conference –

lots of choice in International Taxation, Owner-Manager Issues, Advanced Tax Planning Strategies, Practice Management Issues and core, bread and butter corporate and personal income tax issues – featuring 15 different sessions from which to choose:

- The Cross Border Employee
- Employee Stock Options in Private Companies
- Current GST Issues for the Income Tax Practitioner
- Inbound Foreign Investments
- Executive Compensation in Private Companies
- The Principal Residence Rules
- Professional Corporations
- Soft Issues of Succession Planning
- Charitable Gifting
- Employee Taxable Benefits
- Personal Succession Planning and Hiring/Retention for the Tax Practitioner
- Overview of Estate Freezing
- Knowing Life Insurance Tax for your Clients – Practical Issues
- Life Cycle of a Business – Tax Issues
- Tax Purposes Business Valuations

Plus: Bonus Feature –

the comedic styling of Glen Foster – “That Canadian Guy”



Networking events

where you'll be able to talk with other practitioners about the detailed tax knowledge you've gained at this conference

The highlight of Day 1's networking lunch on Monday, October 15 will be the presentation of the **CICA Award for Excellence in Income Tax Practice and Education**.

This award is presented annually to the professional who best exemplifies the highest qualities of a tax leader in Canada through public practice, corporate or other organizational work and through the promotion of tax education.

upcoming CICA TAXATION PROGRAMS

INCOME TAX

- **CICA In-depth Tax Course – Parts I & II**
Go to www.cica.ca/indepthtax for dates and locations
- **CICA Part 3 In-residence Tax Course**
August 25-29, 2007, Blue Mountain Resort, Collingwood, ON
- **The Annual CICA National Conference on Income Taxes**
October 15-17, 2007, Sheraton Centre Hotel & Towers, Toronto, ON
- **Income Tax Practice Course**
October 20-26, 2007, The Westin Calgary, Calgary, AB
November 24-30, 2007, Blue Mountain Resort, Collingwood, ON
- **Advanced International Tax Course**
November 3-7, 2007, The Pillar and Post, Niagara-on-the-Lake, ON
- **Corporate Reorganizations Course**
November 10-14, 2007, Tremblant, QC
- **Advanced Tax Issues for the Owner-managed Business**
November 17-21, 2007, Hilton Whistler Resort, BC

COMMODITY TAX

- **Commodity Tax Symposium**
October 1-3, 2007, Westin Ottawa Hotel, Ottawa, ON

ADVANCED GST TOPICS:

- **Financial Services and Corporate Transactions**
November 12-13, 2007,
Renaissance Toronto Airport Hotel
- **Cross Border Transactions**
November 14-15, 2007,
Renaissance Toronto Airport Hotel

Taxation

SESSION DESCRIPTIONS • Day 1 – Monday, October 15, 2007

■ 8:30-9:30 a.m.

OPENING KEYNOTE ADDRESS –

Rex Murphy – CBC political commentator and raconteur extraordinaire

Rex Murphy describes himself as a Newfoundlander biting at the heels of Canadian conservatism. The same establishment he playfully chides in his weekly CBC radio show *Cross Country Checkup* and frequent visits to *CBC's National Magazine*, regularly finds Rex to be an entertaining and fiercely witty speaker.

His endearing style showcases a sarcastic intellect and deep insight into issues affecting all Canadian individuals and businesses. Graced with his own brand of persuasion, no one walks away not knowing exactly what Rex Murphy thinks.

Rex will entertain and provide food for thought to everyone at the conference in this unique opening presentation. If nothing else, you will leave this keynote address with an increased awareness of national issues affecting all of us.



■ 9:30-10:30 a.m.

GENERAL SESSION:

An Update on Recent Tax Cases and CRA Assessing Positions

This review of current court cases and current CRA assessing trends will shed light on some current uncertainties in the interpretation of the *Income Tax Act*. Areas of interest that will be discussed include GAAR, aggressive tax planning, tax shelters and hedging losses. A number of interesting tax cases will also be highlighted to help in the understanding of current assessing trends.

It is extremely important that the tax practitioner understand how CRA will view treatment of various tax issues. This session will attempt to clear common misunderstandings that might occur when interpreting matters relating to the *Income Tax Act*.

Speaker: *Ed Kroft, McCarthy Tétrault LLP, Vancouver*

■ 10:30-11:00 a.m.

COFFEE BREAK

■ 11:00-12:15 p.m.

CONCURRENT SESSIONS – CHOOSE ONE OF THREE:

The Cross Border Employee

Retaining and maximizing the effectiveness of talented employees is crucial for organizational success. Companies that can manage international transfers are often rewarded with long-term competitive advantage. However, internationally mobile employees face a myriad of complicated tax rules with potentially hazardous consequences that if not understood and managed can be costly to both employee and corporation. This session will focus on Canadians working abroad and those coming into Canada (depending on the speaker, there may be a Canada/US focus rather than a broader international perspective).

Topics that will be explored include:

- When will you be considered a resident?
- What are the income and estate tax issues of residency?
- Which social security options are there?
- How do you manage cross-border employee stock options?
- What options are there for retirement savings?

Speaker: *Cathy McGill, PricewaterhouseCoopers LLP, Toronto*

OR

Employee Stock Options in Private Companies

Employee stock options are fairly common in public corporations but their use in private corporations is often overlooked. This session will help you rethink the possible use of options as tools for employee retention and even succession planning.

Speaker: *Michael J. Fremes, Vottero Fremes McGrath & Yee, Mississauga*

OR

Knowing Life Insurance Tax for your Clients – Practical Issues

This session reviews the basics of income tax treatment of life insurance policies in a corporate and personal setting. With only a brief review of life insurance products, this session will cover the taxation of life insurance policies including the taxation of dispositions, transfers, cash withdrawals from a policy, tax-free roll-overs available for life insurance, and valuation issues associated with the ownership of policies. It will also discuss the implications of using life insurance policies as collateral for a loan, the deductibility limitations with respect to premiums, and the implications of split dollar insurance arrangements where corporations and individuals share policies. Financial reporting with respect to corporate owned life insurance policies with cash surrender value will be reviewed. A discussion of the terminology associated with the adjusted cost basis of policies and other tax and industry terminology will be reviewed in the material but not in the session.

Speaker: *Gail Grobe, Manulife Financial, Waterloo*

■ 12:15-1:30 p.m.

NETWORKING

Presentation of CICA Award for Excellence in Tax Practice and Education

Sponsored by



FRASER MILNER CENTRE FOR EXCELLENCE

Register on-line at: www.cpd.cica.ca/NCIT

SESSION DESCRIPTIONS • Day 1 – Monday, October 15, 2007

■ 1:30-2:45 p.m.

GENERAL SESSION –

CICA's Annual CRA Roundtable

An extremely popular feature of the Conference is this roundtable where the CICA has invited senior government representatives from CRA to provide the latest report on major policy undertakings at the Agency. Significant issues confronting practitioners and industry today like the current T3 Trust return debate and CRA's proposals will also be addressed. A question and answer period will be included at the end of the roundtable where you can get a response directly from the policy makers on your most-pressing questions.

■ 2:45-3:00 p.m.

COFFEE BREAK

■ 3:00-4:15 p.m.

CONCURRENT SESSIONS – CHOOSE ONE OF THREE:

Inbound Foreign Investments

Foreign investment in Canadian businesses and properties continues to increase and can be seen in all sectors of the Canadian economy. This is the case in both the public company sector and private company sector. This session will review a number of issues and technical matters dealing with non-residents investing in Canada, either through acquisition or start-up, including:

- The Canadian taxation resulting from the use of different foreign entities investing in Canada
- Issues surrounding share acquisitions and related planning
- Dispositions by non-residents
- Canadian thin-capitalization rules
- Selected withholding tax issues
- Selected treaty issues

This session is intended to provide a general overview of the main issues to be addressed when advising non-resident clients on investing in Canadian businesses or property.

Speaker: James Creaser, Grant Thornton LLP, Halifax

OR

Executive Compensation Practices in Private Companies

Executive compensation is a key issue for not only the owner-manager but also for key senior management. In today's competitive environment, providing competitive and cost effective executive compensation strategies is extremely important. This session will cover some of the methods that private companies are using to compensate their executives and the tax implications of these strategies. This will include:

- Salary/bonus planning for owner managers
- Phantom stock option type plans
- Employee profit sharing plans
- Retirement compensation arrangements
- An overview of the salary deferral rules

Speaker: TBA

OR

The Principal Residence Rules

This session will cover the practical and impractical issues of dealing with the exemption from taxation of principal residences. Including a discussion on the management and practice administration complexity with unsophisticated clients in a non-business setting, the session will cover the definitions and special rules of the *Income Tax Act*, and consider 15 to 25 examples in a discussion format. The complexity of properties that are larger than are needed, multiple lot principal residences, properties that are partially used as residences over time, those which are never built or occupied, together with multiple owners will be considered. Practitioners will have an update on individuals who move offshore or who own multiple residences. The discussion will include comment on fees and the value of advice in these seemingly unique circumstances. Goods and Services Tax aspects will be raised but it is not the focus of the session.

Speaker: Ken Laloge, Mackay LLP, Kelowna

■ 4:15-5:30 p.m.

GENERAL SESSION –

The Taxation of Dividends

Significant changes to the taxation of dividends will have a major impact on compliance issues and remuneration strategies.

The concepts of the new regime appear straightforward but the specific rules in determining whether a dividend can qualify as an "eligible" dividend and be subject to a lower rate of tax can be complex.

This session will provide an overview of the new rules, discuss the complications in calculating what qualifies as an eligible dividend and go through tax planning strategies in working with the new rules.

Speaker: Bruce Ball, BDO Dunwoody LLP, Toronto

SESSION DESCRIPTIONS • Day 2 – Tuesday, October 16, 2007

■ 9:00-10:30 a.m.

GENERAL SESSION:

The 2007 Tax Update

This session will review the major tax changes that have occurred over the past year including a discussion of the Federal Budget and a discussion of some of the more significant CRA rulings and interpretations issued over the past 12 months.

This session will examine current changes and relevant issues in taxation that affect individuals and most businesses in the private sector. The proposals from the Federal Budget, as well as other sources of information from the Department of Finance and certain CRA technical interpretations of interest selected from a review of the documents published over the last twelve months will be discussed.

Speaker: Kais Aziz, BDO Dunwoody LLP, Mississauga

■ 10:30-11:00 a.m.

COFFEE BREAK

■ 11:00-12:15 p.m.

CONCURRENT SESSIONS – CHOOSE ONE OF THREE:

Professional Corporations

The growth of professional corporations over the last two years has been explosive and is this year's hot topic in tax.

This session will explore, analyze and explain the structures involving professional partnerships and professional corporations including recent CRA income tax rulings along with related tips and traps in their use and implementation.

Major features of the session will be a discussion of the use of professional corporations for the purposes of wealth accumulation and income splitting, a section contrasting practices in Ontario with those in other provinces as well as highlighting issues to be aware of including personal services businesses and the attribution rules.

When you leave this session, you will have a much better understanding of the tax issues surrounding the uses of professional corporations in your practice and for your clients.

Speakers: David Thompson, Thorsteinssons LLP, Vancouver, Dan Warren, Hendry Warren LLP, Ottawa

OR

Soft Issues of Succession Planning

Tax and business advisors are skilled at guiding clients through the complex structuring and financing associated with business succession planning. However, one of the most important areas that is often overlooked includes the management and family issues that face owner-managers as they attempt to plan for the succession of their business.

In this session, some of the non-technical dilemmas that face the owner-manager will be addressed. The session will look at ways to work with your clients to proactively identify these issues and assist in developing a plan to deal with them. The session will cover topics that will assist the practitioner in uncovering the true objectives and desires of the client, concerns regarding letting go of control and how/when this might occur, ensuring that the next generation have the appropriate support and training to run the company, dealing with expectations of the family and how to equate what is fair versus equitable in a succession plan.

Speaker: Grant Robinson, The SuccessCare Program, Guelph

OR

Charitable Gifting

Canadians have developed a passion for charitable giving, often making it a family affair including children of all ages in planning discussions. Income tax changes over the last few years have made giving extremely attractive. There are many ways to give:

- Alternative ways of structuring a gift
- Gift of cash (currently or in a will)
- In-kind gift of securities
- Gift via insurance
- Strategies to maximize the value of the donation tax credit in the year of death
- Cost and benefits of establishing a private foundation
- Tax effectiveness of international giving
- Donating through your private company

Speaker: Chris Dobbin, BMO Harris Private Banking, Halifax

■ 12:15-1:45 p.m.

NETWORKING LUNCH

featuring the unique comedic talents of Glen Foster

SESSION DESCRIPTIONS • Day 2 – Tuesday, October 16, 2007

■ 1:45-3:00 p.m.

CONCURRENT SESSIONS – CHOOSE ONE OF THREE:

Employee Taxable Benefits

With many sectors of the economy experiencing significant labour shortages, attracting and retaining employees has become more and more important to many businesspeople. Provisions of tax-effective benefits perceived as valuable by employees is a key means of retaining talent, and many clients and employers are interested in advice in this regard.

Are there some benefits you could be receiving to make your own remuneration package more tax-effective? Are there some benefits you could be providing to enhance your ability to attract and retain skilled and valuable employees? What are other employers doing?

This session will discuss the general rules of taxation of employee benefits. As well, the benefits employers commonly provide to their employees (such as company cars and car allowances, parking, life, medical and disability insurance), as well as some less common benefits, will be reviewed.

Speaker: Hugh Neilson, Veres Picton & Co. LLP, Edmonton

OR

Personal Succession Planning and Hiring – Retention for the Tax Practitioner

Human resource concerns are ever present in small and medium-sized accounting firms. The unique environment and sometimes lack of organization structure can result in difficult and uncomfortable situations around staffing, training and overall firm culture.

This session will explore strategies that the smaller firm can employ to handle staffing issues as well as look at the broader issues of succession planning within the firm. Some of the specific methods to be discussed include:

- Contemporary recruiting strategies and methods that work in today's fiercely competitive marketplace
- Signing and performance bonuses – do they really work?
- More competitive benefits packages
- Where are firms finding talented people?
- What is attracting them?
- What you need to know about retention strategies that work

Speaker: Carolyn Cohen, Training and Human Resource Consulting, Toronto

OR

Overview of Estate Freezing

The session is an introductory session dealing with the why, when and how to use an estate freeze in a variety of client circumstances. It will outline types of cases which support the use of an estate freeze. The focus is on the concepts and the practice will be reviewed in less detail. There is a discussion on timing to use an estate freeze and the problems of family issues and values. The use of the enhanced capital gains exemption crystallization, in conjunction with a freeze, and the importance of the subsequent redemption in retirement of the frozen shares are discussed. The problems associated with a freeze will be reviewed with a limited number of examples. The use of trusts to control outcomes and protect for changes in circumstances are outlined. The session is a refresher for experienced accountants and an introduction to current issues for younger professionals.

Speaker: TBA

■ 3:00-3:30 p.m.

COFFEE BREAK

■ 3:30-4:15 p.m.

CONCURRENT SESSIONS – CHOOSE ONE OF THREE:

Current GST and PST Issues for the Income Tax Practitioner

In many cases commodity taxation can be an area that is overlooked by a tax practitioner. This session will review common problem areas that can be faced by companies in the area of commodity taxes including a review of the areas that Canada Revenue Agency focuses on in the course of an audit.

The session will also review the commodity tax issues faced by non taxable entities as well as the real estate transactions.

Speaker: Kal Ruprai, BDO Dunwoody LLP, Toronto

SESSION DESCRIPTIONS • Day 2 – Tuesday, October 16, 2007

OR Life Cycle of a Business – Tax Issues to Consider

This session will cover, on a high level, the various tax and business issues that face clients at different stages in the typical life cycle of a business. Your clients grow from small, start up operations that are heavily financed into mature companies that often generate excess cash flow to, finally, the stage where the business is being sold or transitioned to family. At each stage in this cycle, it is important to recognize and advise on the needs and issues that your clients face.

The session will cover topics such as incorporation and acquisition planning, income splitting, creditor protection, purification methods, using holding companies for passive assets and real estate, and preparing a company for sale.

Speaker: Heath Moore, Grant Thornton LLP, Halifax

OR Tax Purposes Business Valuations

The Canada Revenue Agency will not provide advance tax rulings on matters relating to valuation. It states that each situation is dealt with on an individual basis, particularly for valuations regarding closely-held family businesses. What are the CRA's typical battlegrounds? How would you defend your valuation from CRA's challenges? How should the average practitioner deal with valuation problem areas and avoid the third-party civil penalties regarding "valuation activities"? This session will also discuss the many crucial new developments in the valuation of business interests.

Speaker: Richard Wise, Wise Blackman LLP, Montreal

SESSION DESCRIPTIONS • Day 3 – Wednesday, October 17, 2007

■ 9:00-12:00 p.m. WORKSHOPS – CHOOSE ONE OF TWO

Purchase, Sale and Succession in a Business

A significant number of private companies will be dealing with the purchase, sale and succession of their business over the next five to ten years as the current generation of business owners are looking to retirement. This workshop will deal with various key tax issues including the following:

- Establishing the wishes and needs of the parties
- Preparing for the purchase and sale including due diligence, maximizing value, asset vs. share considerations and non-tax considerations
- Sale/transfer to children covering traditional estate freezes, freezes using a family trust, sale for cash, non-arm's length issues, S 84.1 and gift of shares
- Valuing the business: Vendor vs. the purchaser, earnings vs. liquidation approaches, special purchasers and risk factors
- Sale to management/key employees including financing issues, use of insurance, use of the capital gains exemption, mixing sale vs. redemption strategies, control issues
- Sale to third party – tax deferral and price reduction strategies i.e. planning for the share sale, CDA and RDTOH accounts, transfer of assets prior to sale, use of separate corporations, S.55(2) considerations, capital gains exemption, purification strategies and multiplication of the capital gains exemption
- Inter-provincial planning
- Capital gains rollovers and reserves
- Retiring allowances
- Earn-outs
- Payments based on production or use
- Non-competition payments
- Issues around the allocation of the purchase price
- Leveraged buy-outs
- Interest deductibility
- Asset bumps
- Use of insurance products
- GST considerations

Workshop Leaders: Keith MacIntyre and Kevin Fraser, Grant Thornton LLP, Dartmouth

OR Estate Freezing

This optional workshop session is to review in more detail the practice issues of both estate and taxation associated with estate freezes. This session will include details with respect to techniques to estate freeze with the use of preferred shares, holding companies, and the use of partnerships. The necessary tax attributes of share rights, agreement and value conditions and the complications of share for share exchanges and their taxation are discussed. The considerations in using trusts in family estate freezes and the Trust Sandwich technique will be reviewed. This session is intended to give practitioners an opportunity to discuss matters they have experienced in practice, and consider solutions to the complications of estate freezes in a world of challenge from both tax and family issues.

Workshop Leaders: TBA

SESSION DESCRIPTIONS • Day 3 – Wednesday, October 17, 2007

■ 1:00-4:00 p.m.

WORKSHOPS – CHOOSE ONE OF TWO

The Taxation of Dividends

This workshop will provide an in-depth review of the changes to the rules dealing with the taxation of dividends. The session will include the following:

- An in depth review of the calculations of GRIP and LRIP
- Impact of paying intercompany dividends
- Treatment of losses
- Payment of “excessive” dividends
- Election not to be a CCPC
- Corporate reorganizations
- Impact on integration and remuneration strategies
- Income splitting strategies
- Impact of investment income
- Impact of new rules on traditional tax planning dealing with the sale of a business, post mortem planning
- Impact on safe income planning

Workshop Leader: Fred Richardson, BDO Dunwoody LLP, Toronto

OR

Exit Strategies for the Owner-Manager: Avoiding the Profit and Distribution Trap

During the last decade clients' needs have become increasingly varied and sophisticated, particularly so in the area of wealth accumulation, management and preservation. In the all too common annual “How shall we distribute/ allocate this year's corporate net income?” meeting, often the tax practitioner tends to focus on traditional salary/ bonus/ dividend mixes/ solutions. Here the tax practitioner tries to integrate corporate and personal tax rates to minimize current tax burdens and maximize disposable after-tax income. The question that tax practitioners are asking themselves in light of this litigious era we all operate in today is:

“Am I aware of alternative strategies and solutions that will achieve my client's short, medium and long-term financial goals, particularly if their goals are not necessarily tax driven?”

In order to successfully service your clients' needs in the 21st Century, this workshop is a must for tax practitioners to ensure that they are capable of considering a broader range of solutions to provide in the course of their practices such as: individual pension plans and retirement compensation arrangements; charitable donations; health and welfare trusts; utilizing corporately owned insurances; maximize executive and employee benefit plans. In this workshop, you will gain expert tools and insights to ensure your practice thrives in today's challenging marketplace.

Workshop Leader: Peter Merrick, IPP and Executive Benefit Consultant, Merrick-wealth.com, Toronto

**HOTEL INFORMATION:**

Sheraton Centre Toronto Hotel
123 Queen West Street
Toronto, Ontario M5H 2M9
Tel: (416) 361-1000

The Sheraton Centre is just steps away from Toronto's finest shopping, dining, theatres and attractions. Access is convenient, close to TTC, GO, valet parking plus connectivity to the largest underground public parking lot in Toronto, plus convenient pick-up/drop off (every 30 minutes, 24 hrs) of the Airport Express.

The 1,377 guestrooms and suites feature the Sheraton Sweet Sleeper Bed and award winning dining choices and unparalleled amenities. Conference participants can enjoy \$239.00 (plus applicable taxes) for a Main Room or \$299.00 (plus applicable taxes) for a Club Room based on single or double occupancy. Early reservations are recommended. After September 14, reservations are accepted on a space and rate availability basis. Contact the Sheraton Centre directly at 416-361-1000. Identify yourself as a CICA Participant for the special conference rate.

CANCELLATION POLICY:

If you are unable to attend the National Conference on Income Taxes for any reason, you may substitute, by arrangement with the registrar someone else from your organization, or, you may cancel up to Friday, October 5, 2007, 5:00 p.m. EDT for a full refund. If you cancel after Friday, October 5, 2007 a \$150 (plus GST) administration fee will apply. Please note that all cancellations must be received in writing, either by mail to CICA, Continuing Education, 277 Wellington Street W., Toronto, ON M5V 3H2, Attn: Crystal Wood, Continuing Education, faxed to 416-204-3415, or emailed to crystal.wood@cica.ca.

PROGRAM DISCLAIMER:

The speakers, topics, program format and events are correct at the time of printing. If unforeseen circumstances occur, CICA reserves the right to alter or delete items from the program, or cancel the Conference and refund all registration fees.

Register on-line at: www.cpd.cica.ca/NCIT



National Conference on Income Taxes Web Community

The Conference-exclusive Website
www.conferences.cica.ca/NCIT

Go to the Conference website to register on-line and to view any late-breaking news and added features.

As a registrant of the National Conference on Income Taxes '07, you will be emailed a password approximately two weeks before the conference to access the valuable reference materials submitted by the speakers as they are finalized! You can download and print material from the reference library, and begin planning your personal itinerary for this event to use your time more effectively at the conference.

Check back after the Conference for supplemental information and updates to the materials.

Ways To Register

Register On-line at the Conference-exclusive Web Community: www.cpd.cica.ca/NCIT

For on-line registration technical assistance, please contact Jane Gravel at HTG Meeting Solutions by e-mail at jgravel@htg.ca or by telephone at 1-800-692-1545, ext. 300

Mail Your Form and Payment to:

HTG Meeting Solutions
 200-815 Taylor Creek Drive
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Event Contact Information

For more information about this event, go to the NCIT Web Community at www.cpd.cica.ca/NCIT, or contact Crystal Wood by e-mail at crystal.wood@cica.ca or by telephone at 416-204-3342.



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Event Contact Information

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