Chartered Accountants of Canada
Comptables agréés du Canada

Join your colleagues at the 11th annual

CICA National Conference on Income Taxes

September 12-13, 2012 (optional workshops September 14) ■ **Toronto Congress Centre, Toronto, ON**

A tremendous tax development opportunity for high-performing owner-managed general practitioners, and professionals in industry and government who advise on income tax matters

Kick-start your day with our keynote address from:

Michael Hlinka
CBC Business Contributor and Finance Expert

CONFERENCE AGENDA

Day 1 – Wednesday, September 12, 2012

7:30 – 8:30	REGISTRATION AND CONTINENTAL BREAKFAST / EXHIBITS OPEN *Registration sponsored by* Teegarden Schiller	
8:30 – 9:30	**Opening Remarks and Keynote Address – Michael Hlinka** CBC Business Contributor and Finance Expert	
9:30 – 10:30	**Tax Developments – Year in Review** *Jim McConnery, Welch LLP*	
10:30 – 11:00	COFFEE BREAK / EXHIBITS OPEN	
11:00 – 12:00	**Trust Defence: A Practical Approach to CRA Audits** *Joan Jung, Minden Gross LLP*	**Impact of Recent SR&ED Changes and Practical Issues** *Dave Douglas, Deloitte & Touche LLP*
12:00 – 1:15	NETWORKING LUNCH **Presentation of CICA Award for Excellence in Income Tax Practice and Education**	
1:15 – 2:15	**U.S. Citizen Non-Compliance: The Canadian Resident Conundrum** *Dean Smith, Cadesky & Associates LLP*	**Special Session Set: Master the Capital Dividend Account and its Planning Potential** *Patrick Uzan, Canada Life*
2:15 – 3:15	**Taxpayer Migration** *Don Beadle, Brydon Chartered Accountants*	
3:15 – 3:45	COFFEE BREAK / EXHIBITS OPEN	
3:45 – 5:00	**CRA Roundtable** *Moderator: Gabe Hayos, Canadian Institute of Chartered Accountants* *Panelist: Jim Gauvreau, Canada Revenue Agency*	
5:00 onwards	NETWORKING RECEPTION HOSTED BY EXHIBITORS	

CONFERENCE AGENDA

Day 2 – Thursday, September 13, 2012

7:30 – 8:30	REGISTRATION AND CONTINENTAL BREAKFAST / EXHIBITS OPEN *Registration sponsored by* Teegee Schiller	
8:30 – 9:30	**Case Law Update** *Ed Kroft, Blakes LLP*	
9:30 – 10:30	**Tax Practice Operations and Risk Management – Best Practices** *Gabe Hayos, Canadian Institute of Chartered Accountants* *Brian Wilson, Wilson Vukelich LLP*	
10:30 – 11:00	COFFEE BREAK / EXHIBITS OPEN	
11:00 – 12:00	**Hot Topics in HST: Private Company Edition** *Cathy Kuhrt, Grant Thornton LLP*	**Joint Venture and Partnership Reporting Requirements and Related Issues** *Rachel L. Gervais, BDO Canada LLP*
12:00 – 1:15	NETWORKING LUNCH **Special session with Paul Dubé, Canada Revenue Agency's Ombudsman**	
1:15 – 2:15	**Personal Service Business: Handling the Issues**	**Special Session Set: Get a Grip on Mergers and Acquisitions** *Silvia Jacinto, Soberman LLP*
2:15 – 3:15	**Rectification and Other Remedies** *Robert Kepes, MKW Tax Lawyers*	
3:15 – 3:30	COFFEE BREAK / EXHIBITS OPEN	
3:30 – 4:30	**CRA Demo: Increasing Efficiency of Tax Administration – New Online Services for Business** *Mark Mayer, Canada Revenue Agency*	

Day 3 – Friday, September 14, 2012 (Optional Workshops)

9:00 – 12:00	**Tax Planning for Private Enterprises: Business Succession** *Manu Kakkar, The Kakkar Group*	**Investment in U.S. Real Estate: Canadian and U.S. Tax Implications** *Jason Ubeika and Megan Sultani, BDO Canada LLP*

The conference information is correct at time of printing. For the most current information on agenda items, speaker bios, sponsors, etc., visit the conference web community at: www.cpd.cica.ca/NCIT

Attend the **National Conference on Income Taxes** and receive unparalleled insights and practical tools to help you deal with the most pressing issues faced by Canadian private companies, and their owners today!

Don't miss our exciting programming, specifically designed to provide maximum benefit to high-performing general practitioners, government, and other professionals employed in private companies, who advise or work on income tax matters throughout the year.

Join us for our annual networking reception where you'll be able to engage other practitioners about the detailed tax knowledge you've gained at this conference.

Why You Need to be Here!

The **CICA National Conference on Income Taxes** is the must-attend conference for tax, accounting, and legal professionals – and here's a glimpse of just a few of the reasons why:

1. Perfect balance of practical guidance and technical subject matter that can be immediately applied to your client situations.
2. Learn from an accomplished faculty roster, including legal and accounting authorities with plenty of experience and knowledge, sharing perspective on complex tax planning strategies and interpretations.
3. Experience our special two-hour session sets, designed to help you hone and apply your tax expertise even further.
4. It delivers 15 hours of verifiable CPD – and even more with one of our exceptional post-conference workshops.
5. Seize this opportunity to hear the latest news on three important topics from the Canada Revenue Agency.

Who Should Attend

This conference is for professionals who are serious about working in, advising, or planning in the area of income taxation: Chartered Accountants, lawyers, and other tax professionals in industry or government that advise or work with Canadian private corporations and their owners.

2012 National Conference on Income Taxes

ADVISORY COMMITTEE

Michael Atlas, CA
Michael Atlas Chartered Accountant, Toronto

Armando Iannuzzi, CA
Kestenberg Rabinowicz Partners LLP, Markham

Ken Laloge, CA
MacKay LLP, Kelowna

Patrick Uzan, CA
Canada Life, Calgary

Karen Yull, CA
Grant Thornton LLP, Toronto

Stefan Mihailovich, CA
CICA, Toronto

Session Descriptions

DAY 1 – WEDNESDAY, SEPTEMBER 12, 2012

7:30 am REGISTRATION AND CONTINENTAL BREAKFAST / EXHIBITS OPEN

Registration sponsored by Teeger Schiller

8:30 am **Opening Keynote Address – Michael Hlinka**

Join CBC Business Contributor and Finance Expert, Michael Hlinka, as he shares his keen insights into the world of business, economics and world events. The passionate yet grounded journalist and award-winning George Brown College professor trims the fat of economic discourse to deliver ever-energized, highly engaging and surprisingly funny talks on everything from taxation to political economic interventions.

9:30 am **Tax Developments – Year in Review**

Speaker: Jim McConnery, Welch LLP

The 2012 Federal Budget contains a number of proposals and changes that will impact taxpayers and their advisors. This session will provide insights and analysis on each of the most pressing changes, and how they will impact your business and your clients. It is extremely important for tax advisers to be aware of each and every one of these latest developments.

10:30 am COFFEE BREAK / EXHIBITS OPEN

11:00 am CONCURRENT SESSIONS – CHOOSE ONE OF TWO:

Trust Defence: A Practical Approach to CRA Audits

Speaker: Joan Jung, Minden Gross LLP

Trusts can be a valuable and flexible tool for tax and estate planning but the nature of the relationship must be respected. Failure to do so can result in tax issues and legal complications running from: an invalidly constituted trust, attribution problems, control and residency issues, amounts paid or payable, management fees, the spectre of s.75(2), and the "sham trust."

CRA has displayed increasing interest in such trust technicalities. This session will provide a practical overview of the above with specific discussion of structuring considerations and traps to avoid.

OR **Impact of Recent SR&ED Changes and Practical Issues**

Speaker: Dave Douglas, Deloitte & Touche LLP

Attend this insightful session to learn about the latest changes to the SR&ED system and how they will impact you and your clients going forward. Dave will use his vast experience in this area to walk you through common pitfalls of the claim process, and he will also provide you with tips to help smooth out the process and how to identify and overcome potential issues and processing delays.

12:00 pm NETWORKING LUNCH

Presentation of CICA Award for Excellence in Income Tax Practice and Education

Session Descriptions

1:15 pm CONCURRENT SESSIONS – CHOOSE ONE OF TWO:

U.S. Citizen Non-Compliance: The Canadian Resident Conundrum (1:15 – 2:15 pm)

Speaker: Dean Smith, Cadesky & Associates LLP

As a result of the UBS and Liechtenstein Global Trust scandals involving U.S.-based taxpayers, Congress has significantly increased the compliance burden for Canadian resident U.S. taxpayers with offshore investment vehicles. While these rules may be targeted at U.S.-based tax evaders, many innocent filers have been caught up in these rules.

This session will discuss the options available to U.S. taxpayers who are not compliant and what they need to do on a go-forward basis. The session will also discuss selected areas where U.S. taxpayers may have unintended results because of the utilization of Canadian planning vehicles such as TFSAs and RESPs.

AND

Taxpayer Migration (2:15 – 3:15 pm)

Speaker: Don Beadle, Brydon Chartered Accountants

As the Canadian work force becomes more mobile, and retiring baby boomers look to move outside of Canada, employers and service providers must develop a greater awareness of the cross border tax implications of such actions.

This session will review the legislation, CRA's interpretation and court rulings regarding establishing and ceasing residency. It will also review the foreign reporting filing requirements for all Canadian taxpayers, and even the specifics of Canada's "departure tax" rules, such as reviewing which assets are subject to the deemed disposition rules, how to defer payment of the departure tax, unwinding the deemed disposition and how these rules apply to short-term residents of Canada.

OR

Special Session Set: Master the Capital Dividend Account and its Planning Potential (1:15 – 3:15pm)

Speaker: Patrick Uzan, Canada Life

The CRA has moved towards greater centralization of its processing of CDA elections. It has become increasingly important to exercise care when preparing elections in order to properly manage tax practice risk and avoid excessive elections. This session will focus on the following aspects of the capital dividend account and related planning:

- misconceptions relating to the calculation of the CDA
- common errors and traps when computing the CDA balance
- practical problems and solutions in "capturing" the CDA balance
- utilizing resources available from CRA
- understanding CRA's current practices when processing CDA elections
- planning techniques using the CDA: going beyond a simple dividend declaration
- preparing the CDA election and documentation requirements
- late filing penalties and dealing with excessive elections
- CDA anti-avoidance rules

3:15 pm COFFEE BREAK / EXHIBITS OPEN

3:45 pm

CRA Roundtable

Moderator: Gabe Hayos, Canadian Institute of Chartered Accountants

Featuring: Jim Gauvreau, Canada Revenue Agency

Senior government representatives from CRA have been invited by CICA to give a timely report on policy initiatives of the day and an update on the administrative and practical issues that have arisen over the last year. This session will provide CRA an opportunity to communicate directly to Canadians, and allow for some Q&A time in response to pre-submitted questions collected by CICA prior to the conference.

Session Descriptions

DAY 2 – THURSDAY, SEPTEMBER 13, 2012

7:30 am REGISTRATION AND CONTINENTAL BREAKFAST / EXHIBITS OPEN

Registration sponsored by Teeger Schiller

8:30 am **Case Law Update**

Speaker: Ed Kroft, Blakes LLP

This session examines current court cases and some areas of current CRA audit scrutiny and assessing practices broken down by various topics, including: tax avoidance and the general anti-avoidance rule, waivers of arrears interest, director's liability, income vs. capital, deductibility of business expenses, allocation of purchase price, collection of tax debts, valuation issues, administration and enforcement, and international and cross-border issues.

9:30 am **Tax Practice Operations and Risk Management – Best Practices**

Speaker: Gabe Hayos, Canadian Institute of Chartered Accountants, and Brian Wilson, Wilson Vukelich LLP

The session will help practitioners effectively and efficiently complete tax engagements by highlighting useful tools and best practices that minimize risk of error. It will also help practitioners protect themselves by reviewing common missteps that can give rise to claims against them. The session will illustrate alternatives to these ineffective and risky strategies that can help you achieve the desired result without the risk of adverse tax consequences.

10:30 am COFFEE BREAK / EXHIBITS OPEN

11:00 am CONCURRENT SESSIONS – CHOOSE ONE OF TWO:

Hot Topics in HST: Private Company Edition

Speaker: Cathy Kuhrt, Grant Thornton LLP

In this session, Cathy will examine some of the most critical HST issues she and her colleagues have been dealing with over the past 12 months relating to private companies, and discuss their implications for your business and clients.

OR **Joint Venture and Partnership Reporting Requirements and Related Issues**

Speaker: Rachel L. Gervais, BDO Canada LLP

This session will dive into the new reporting requirements for joint ventures, while also looking at some of the current conflicts clients are facing with the CRA. Other areas of focus will be: taxation on real estate developments, a comparison of JV and partnership issues, and when a JV is actually a partnership.

12:00 pm NETWORKING LUNCH

Featuring a special session with Paul Dubé, Canada Revenue Agency's Ombudsman

Session Descriptions

1:15 pm CONCURRENT SESSIONS – CHOOSE ONE OF TWO:

Personal Services Business: Handling the Issues (1:15 – 2:15 pm)

Speaker: TBA

Join this session to learn about the important changes impacting Personal Service Businesses, and what to do next. The new legislation has left many taxpayers scrambling to determine what the most tax effective course of action is under this new regime, which effectively raises the PSB tax rate to 13% higher than the general corporate rate. This session will help you understand the changes, and how to deal with its far-reaching impacts.

AND

Rectification and Other Remedies (2:15 – 3:15 pm)

Speaker: Robert Kepes, MKW Tax Lawyers

This session will provide practitioners with an interesting arsenal of legal remedies to help them and their clients correct past oversights. Robert will leverage his great experience from encounters with the CRA at various levels of court, including application for rectification orders before the Ontario Superior Court of Justice - to provide the audience with awareness and comfort around the potential remedies available to taxpayers.

OR

Special Session Set: Get a Grip on Mergers and Acquisitions (1:15 – 3:15 pm)

Speaker: Silvia Jacinto, Soberman LLP

This detailed session on mergers and acquisitions will provide you with the breadth of knowledge and technical understanding needed to confidently advise your clients through such a complex transaction. During this special two-hour session, Silvia will lead the group through the common issues faced by companies working through a merger or acquisition, as well as focusing on the tax planning and technical steps necessary for a successful result. By attending this session, you will be better prepared to successfully work through the tax implications of a transaction, and identify tax risks early in the process to provide your clients with a more profitable and tax-efficient outcome.

3:15 pm COFFEE BREAK / EXHIBITS OPEN

3:30 pm

CRA Demo: Increasing Efficiency of Tax Administration – New Online Services for Business

Speaker: Mark Mayer, Canada Revenue Agency

Don't miss this exciting opportunity to have Mark Mayer from the Canada Revenue Agency showcase the latest features of their new online services for businesses. From making an online request, submitting enquiries and even uploading accounting data, the CRA is making a leap into the technology era by helping increase the efficiency of tax administration through more robust online services.

Session Descriptions

DAY 3 – FRIDAY, SEPTEMBER 14, 2012 – OPTIONAL WORKSHOPS

9:00 am CHOOSE ONE OF TWO

Tax Planning for Private Enterprises: Business Succession

Workshop Leader: Manu Kakkar, The Kakkar Group

This workshop will provide an in-depth look at the income tax planning strategies and issues surrounding business succession. Manu will leverage both lecture materials and hands-on examples to cover off important topics such as: estate freezes and post-mortem planning, intra-family transfers, arms-length sale of shares, purification, and financing considerations. By the end of the workshop, participants should have acquired the technical knowledge to help them successfully complete a business succession.

OR

Investment in U.S. Real Estate: Canadian and U.S. Tax Implications

Workshop Leaders: Jason Ubeika and Megan Sultani, BDO Canada LLP

This workshop will dive into the tax implications of both business and personal investment in U.S. real estate, to help you prepare for potential buying or selling opportunities that you or your clients identify. This extensive workshop will provide you with the tools you need to understand the tax impacts from both sides of the border, including: forms of ownership, U.S. and Canadian tax during the ownership phase, tax on disposition, foreign tax credits, withholding tax, U.S. net rental election, passive activity rules, AMT, filing requirements and more.

Sponsorship Opportunities

CICA CPD events provide you with an excellent opportunity to build credible exposure with a carefully targeted audience of decision makers, while building and reinforcing one-to-one business relationships.

For information on **sponsorship and exhibitor opportunities**, please contact Manuela Downey at manueladowney@rogers.com.

CA Learning Centre

For a full range of **CICA Continuing Education products** and **sponsorship** information, visit the CA Learning Centre at www.calearningcentre.ca

Registration Information and Conditions:

CONFERENCE LOCATION:

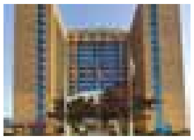
Toronto Congress Centre
South Building
650 Dixon Road Toronto, ON M9W 1J1

Phone (416) 245-5000
www.torontocongresscentre.com

Toronto's newest, largest and most innovative trade show and premier convention complex featuring more than one million square feet of exhibit space and the industry's best project managers. The Toronto Congress Centre prides itself on continually redefining excellence and staying ahead of the curve. This world-class infrastructure creates environments for clients that fulfill their visions, expectations and suit their corporate culture.

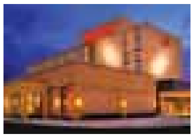
CONFERENCE ACCOMMODATION:

Attendees are responsible for making their own hotel room reservations. CICA has reserved a limited block of guest rooms at a guaranteed rate at the following hotels listed below. Book early to avoid disappointment.



Radisson Suite Hotel Toronto Airport
640 Dixon Road, Toronto, ON M9W 1J1
Phone: 416-242-7400 / 1-800-333-3333 (reference "CICA")
Online: www.radisson.com/ncit

Enjoy guaranteed room rates from $127 to $157/night plus applicable taxes and fees, available until late August or when rooms are sold out.



Sheraton Toronto Airport Hotel
801 Dixon Road, Toronto, ON M9W 1J5
Phone: 1.800.325.3535 (reference "NCIT")

Guaranteed room rates of $157/night for a Traditional Room will be available until late August or when rooms are sold out.

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.

CANCELLATION POLICY:

If you are unable to attend the event for any reason, you may substitute, by arrangement with the Participant Coordinator, someone else from your organization, or, you may cancel up to 14 calendar days prior to the event start date for a full refund. Cancellations received within 14 calendar days of the event start date will be subject to a $150 administration fee (plus applicable taxes).

PLEASE NOTE: All cancellations must be received in writing, either by mail to: CICA Continuing Education, 277 Wellington Street West, Toronto, ON M5V 3H2, Attn: Liliia Dubko, Participant Coordinator, faxed to (416) 204-3415, or emailed to registration@cica.ca

REGISTRATION FORM

YES! I would like to attend the **2012 National Conference on Income Taxes**. Please register me for the following:

❑ **CONFERENCE* ONLY** (12 - 13 September 2012) $995.00 $ ____________

CONFERENCE* AND ONE WORKSHOP (September 12-14) – ***Select one***:

❑ Tax Planning for Private Enterprises: Business Succession $1,290.00 $ ____________

❑ Investment in U.S. Real Estate: Canadian and U.S. Tax Implications $1,290.00

ONE WORKSHOP ONLY (September 14) – ***Select one***:

❑ Tax Planning for Private Enterprises: Business Succession $595.00 $ ____________

❑ Investment in U.S. Real Estate: Canadian and U.S. Tax Implications $595.00

****Conference registration includes BONUS FREE post-conference CD-ROM***
(The CD-ROM will be available approximately 6-8 weeks post-event.)

HST #106861578RT0001

Sub Total **$** ____________

Plus 13% HST $ ____________

TOTAL **$** ____________

First Name (preferred) ____________ Middle Initial(s) ____________

Badge Name (If different than First Name) ____________

Surname ____________

I am a: ❑ CA ❑ Other Accounting Designation (please specify): ____________

❑ Lawyer ❑ Other (please specify) ____________

Title ____________

Firm/Employer ____________

Department ____________

Business Address ____________

City ____________ Province ____________ Postal Code ____________

Business Phone ____________ Business Fax ____________

Email ____________

Special dietary or other requirements (needs, not preferences): ____________

PAYMENT:

(Note – registration cannot be processed until payment is received.)

❑ Cheque *(payable to The Canadian Institute of Chartered Accountants)*

Credit Card: ❑ Visa ❑ MasterCard ❑ AMEX

Card No. ____________

Expiry Date ____________

Name of Cardholder ____________

YOU MUST HAVE AN ACCOUNT TO REGISTER

Before you can register for a CICA event using one of the methods below, please ensure you have an active account and profile. Visit the CA Store at **www.castore.ca** and click on “my account” (top right-hand side), and either login and ensure your profile information is current, or, create a profile if you do not have an account.

WAYS TO REGISTER:

MAIL REGISTRATION FORM AND PAYMENT TO:
CICA Continuing Education
277 Wellington Street West, Toronto, ON M5V 3H2

FAX REGISTRATION FORM AND PAYMENT INFORMATION TO:
416-204-3415
Attn: Liliia Dubko

REGISTER ONLINE AT:
www.cpd.cica.ca/NCIT

REGISTER BY PHONE:
416-651-5086 or toll-free 1-888-651-5086