Corporate Tax: An Introduction (YLD)
Young Lawyers Division, Business Law and Taxation Law

Date: Monday, December 8, 2014 | 9:00 am to 12:30 pm
Location: Twenty Toronto Street Conference and Events Building, 2nd Floor, Toronto
Program Chairs: Lucinda Main, Associate, Beard Winter LLP
Chris Markou, Lawyer, Lawrence, Lawrence, Stevenson, LLP

Do tax issues pop up in your corporate transactions? Are you interested in expanding your understanding of corporate taxation concepts? Our panel of seasoned professionals will arm you with the most effective tools to address a compliment of tax-related challenges.

8:30 am Registration and Coffee

9:00 am Welcome and Opening Remarks

9:10 am Overview of Tax Attributes
Rebecca Potten, Thorsteinssons LLP
Do you have to decipher tax terms as part of a corporate deal? Gain an overview of basic corporate tax concepts and definitions, to provide you with a starting base, including:
- stated capital;
- paid up capital;
- adjusted cost base; and
- disposition.

9:30 am Tax Considerations For Different Business Structures
Catherine Nicholson, Senior Associate, Torys LLP
Each type of business structure has different tax implications. Review tax consequences of different business set ups, including, sole proprietorships, partnerships, joint ventures and corporations. Analyze key tax elements for each form of business.

9:50 am Corporate Distributions in Owner-Manager Businesses
Mac Killooan, Tax Accountant, Friston Kates LLP
Focused on owner-manager businesses, gain insight into the different methods an owner-manager can remove funds from his or her company, through dividends, bonus, salary and other mechanisms. Explore tax treatments afforded to each sort of distribution.

10:10 am Asset vs. Share Sales
Peter Clark, Partner, Baker & McKenzie LLP
A business can be bought or sold through the sale of assets or through the sale of shares. Obtain an overview of tax treatments involved of each type of transaction. Acquire a comparative analysis of these differences as well as a brief review of hybrid transactions.

10:30 am Networking Break

10:45 am Rollovers in Estate Freezes and Corporate Reorganizations
Richard Lewin, Partner, Wildeboer Delleece LLP
The Income Tax Act permits the transfer of assets and shares on a tax-deferred basis in some cases. Section 85 rollovers are used regularly. Gain a detailed review of the use of section 85 rollovers in the context of estate freezes and other corporate reorganizations. Investigate implications of the requirements essential to obtain a tax-deferred rollover.

11:05 am Share Exchanges in Corporate Reorganizations
Katy Pitch, Senior Associate, Stikeman Elliott LLP
Compare the different types of share exchanges used in a corporate reorganization, such as sections 51, 85.1, 86 and 86.1 of the Income Tax Act. Procure a comprehensive analysis of when and why each share exchange should be used, and distinguishing key characteristics of each option.

11:25 am Tax Litigation and Dispute Resolution
John Sorenson, Senior Associate, Gowling LaFleur Henderson LLP
Brush up on fundamentals of tax dispute resolution and the latest types of tax dispute resolution techniques. Most importantly, decipher the intricacies of:
- how to managing audits to notices of objection;
- important tax considerations in the litigation process;
- collection issues;
- how and when to seek settlements; and
- penalty risks.

11:45 am Professionalism and Ethical Issues in Corporate Tax Practice
John Tobin, Partner, Torys LLP
Lucinda Main, Associate, Beard Winter LLP
John Sorenson, Senior Associate, Gowling LaFleur Henderson LLP
With the new Rules of Professional Conduct now in effect, gain insight into common professionalism and ethical issues a junior corporate tax lawyer may face, including:
- request to backdate documents;
- dealing with audit request letters;
- complying with know your client requirements;
- differentiating between tax avoidance vs. tax evasion; and
- handling conflicts of interest.

Fill your toolkit with these essential resources to help you effectively address tax concerns on your next transaction.

12:15 pm Q&A Session

12:30 pm Closing Remarks and Program Concludes

PROGRAM REGISTRATION IS ONLINE www.oba.org/pd

Questions? pd@oba.org

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