

Section 85, 86 and 51 Rollovers - What You Need to Know

Business Law



Webcast

Date: Thursday, October 05, 2023 | 12:30 pm to 3:30 pm

Location: Webinar Only

Chair: **Michael D. Segal**, Loopstra Nixon LLP

This program contains:
3hr 0m of Substantive Content

Overall Program Description: Working with start-ups? Or business owners looking to transition their business structures or prepare for a sale? Then you need to understand rollover possibilities and risks. Join us for a refresher course on ITA section 85, 86 and 51 rollovers. Which section should you use and when? What are the legal and tax implications and requirements for each? In other words, everything you wanted to know about sections 85, 86 and 51 of the ITA, but were afraid to ask.

Sections 86 and 51 of the ITA are most commonly used in estate and/or sale planning for private-company shares. We'll discuss the following: What are the requirements for each? Why might it be beneficial to use one over the other in certain situations? What are the implications of each type of rollover for your client?

Section 85 commonly referred to as the rollover section of the Act can be used in a multitude of ways. Amongst a few are you can turn a proprietorship or a partnership into a corporate entity; you can transfer shares to a corporate entity as part of a family business re-organization or you can use this section to move surplus cash, exposed in an operating company, into a holding company away from creditors. The best part, all with no direct tax consequences. Join us to increase your ability to spot opportunities to further your client's business interests.

12:30 pm	Welcome and Opening Remarks by the Program Chair
12:35 pm	Business aspects of Section 85 Michael D. Segal , Loopstra Nixon LLP
1:30 pm	Tax Aspects of Section 85 John Grummett , Taylor Leibow LLP
1:45 pm	Break
2:00 pm	Business Aspects of Sections 86 & 51 Andreea Muth , Pallett Valo LLP
2:55 pm	Tax aspects of Sections 86 & 51 John Grummett , Taylor Leibow LLP
3:10 pm	Questions and Closing Remarks
3:30 pm	Program Concludes