



Pacific Business & Law Institute

Approved by the Law Society of BC for 6.5 hours of professional development credits



TAXATION OF COMMON BUSINESS STRUCTURES

Chaired by
David Christian
Thorsteinssons LLP

February 22nd, 2017 • UBC Robson Square • Vancouver, BC

Live Webinar also available!

R P G / P R G	CANADA		POSTES
	POST		CANADA
		Postage paid	Port payé
		Addressed Admail	Médiaposte avec adresse
	4551907		
RETURN POSTAGE GUARANTEED PORT DE RETOUR GARANTI			

CHAIR



David Christian, Partner, Thorsteinssons LLP, Vancouver, BC. Mr. Christian's practice covers all taxation matters, with a particular focus on corporate reorganizations and taxation of owner-managed businesses. He is a former adjunct professor of taxation law at the University of British Columbia, and has served as a member of the Joint Committee on Taxation of the Canadian Bar Association and the Canadian Institute of Chartered Accountants. Mr. Christian has lectured on tax matters at conferences for the Canadian Tax Foundation and for various professional organizations including the Certified General Accountants Association of British Columbia, the Institute of Chartered Accountants of British Columbia, the British Columbia Medical Association and the Canadian Bar Association.

FACULTY



Asif Abdulla, Associate, Thorsteinssons LLP, Vancouver, BC. Asif practises in the area of domestic and international tax planning for individuals, trusts, corporations, and other private enterprises. Asif's practice is focused on advising individuals and businesses in respect of succession and estate planning, tax-driven corporate reorganizations, immigration/emigration tax planning, business structuring, and cross-border tax planning. Asif acts for a number of clients who are in dispute with the Canada Revenue Agency and provides advice in respect of applying under the Voluntary Disclosure Program. Asif is an instructor and co-author for the CPA course entitled "Tax Planning for Private Enterprises on Business Succession". He is also a contributor to Canadian Tax Foundation publications and has completed all three years of the In-Depth Tax Course offered by CPA Canada.



Michael Coburn, Partner, Fasken Martineau DuMoulin LLP, Vancouver, BC. Michael Coburn's practice focuses on a broad range of corporate and personal tax matters. He regularly advises clients on the most tax-efficient means of completing a transaction, and he has extensive experience with respect to the tax implications and structuring of mergers and acquisitions, corporate reorganizations, financings, and other business transactions. Mike also regularly assists clients in disputes with the Canada Revenue Agency and other taxing authorities. Mike was included in the Canadian "Best Lawyers" list for the past three years, and he has previously presented at professional development courses provided by CLE BC and CPA Canada.



Stephanie J. Daniels, Partner, Farris, Vaughan, Wills & Murphy LLP, Vancouver, BC. Stephanie is a tax and estate-planning lawyer in the Tax and Private Wealth Group at Farris. Since her call to the bar in 2004, Stephanie has practised in the areas of taxation, wealth management, and trust and estate planning. Stephanie creates tax-effective estate plans (including wills, estate freezes and all types of trusts) and corporate structures for families and high-net-worth individuals. Stephanie frequently works in collaboration with family law lawyers, accountants, and financial advisors and has experience in cross-border estate planning. She is a frequent presenter and author, a member of the Canadian Tax Foundation, the Society of Trust & Estate Practitioners, and the Canadian Bar Association's Tax, Wills & Trusts (Executive member) and Charities & Not-For-Profits Sections, and a past director of the Association of Women in Finance. She has completed Parts I and II of the Canadian Institute of Chartered Accountants In-depth Tax Course and the Minerva Foundation of British Columbia's Women Leading the Way course. In 2016 Stephanie was voted by her peers one of the *Best Lawyers in Canada* in the area of Trusts & Estates.



Ron Dueck, Partner, Farris, Vaughan, Wills & Murphy LLP, Vancouver, BC. Ron's practice focuses on tax planning for private and public businesses and funds, particularly in the context of reorganizations, acquisitions and divestitures, and cross-border investment and growth. Ron also advises owner-managers regarding tax-efficient growth, transition, and estate strategies, and assists companies with navigating complex audits and CRA disputes. Ron regularly presents on business and corporate income-tax topics, most recently at the BC Tax Conference in October of 2016 on the topic of tax-free inter-corporate dividends under the newly amended subsection 55(2) of the Income Tax Act. Ron is a member of the Canadian Tax Foundation, Canadian Bar Association, and the Law Society of British Columbia.

Taxation of Common Business Structures: Comparing Forms and Optimizing Results

The way a business is structured has substantial implications for its various tax burdens and benefits. Understanding the differences in taxation of different business structures allows business owners, managers, or advisors to manage the taxation of income and profits efficiently. Whether a business is just starting out or is long-established, important decisions made every day can have tax implications down the road. Foresight and knowledge about potential issues allows a business to take steps now to structure itself to obtain optimal results in the future.

At this conference, our expert faculty will cover the key considerations when comparing the taxation of various business forms, including applicable anti-avoidance rules. Our faculty will highlight common and important issues affecting the taxation of closely held corporations, partnerships, and trusts. You will learn how to avoid common traps effectively, and to organize a business so as to reduce tax burdens and increase after-tax income.

KEY AREAS TO BE COVERED:

- Key issues in the taxation of business income, investment income, and corporate capital gains
- Taxation of inter-corporate dividends, deemed dividends, benefits, and other corporate distributions of profits
- Comparative issues in the taxation of general and limited partnerships
- Important rules for the taxation of trusts, including attribution rules, income-splitting, and graduated-rate estates
- Understanding the anti-avoidance rules that apply to common business structures
- A deep-dive into complex business structures as our faculty discusses a fact pattern that addresses the tax implications of various business forms

WHO SHOULD ATTEND?

- Lawyers who practise in the areas of business law, estate planning, or taxation
- Accountants practising in the areas of corporate taxation or advisory services for privately held businesses
- Owners and managers of businesses
- Financial planners and business consultants

TAXATION OF COMMON BUSINESS STRUCTURES

FEBRUARY 22ND, 2017

9:00 Welcome and Introduction by PBLI

9:05 Chair's Welcome and Introduction

David Christian
Thorsteinssons LLP

9:15 Closely Held Corporations: Taxation of Corporate Income

Asif Abdulla
Thorsteinssons LLP

- Outline of corporate taxation
- Taxation of business income
- Taxation of investment income
- Taxation of capital gains

10:05 Questions and Discussion

10:15 Refreshment Adjournment

10:30 Closely Held Corporations: Taxation of Corporate Distributions

Michael Coburn
Fasken Martineau DuMoulin LLP

- Shareholder and inter-corporate dividends
- Benefits, salary, and bonuses
- Capital transactions and deemed dividends
- Return of capital

11:20 Questions and Discussion

11:30 Taxation of Partnerships

Ron Dueck
Farris, Vaughan, Wills & Murphy LLP

- Taxation of partnerships generally
- Differences in taxation of general and limited partnerships (at-risk and negative ACB rules)
- Acquisitions and dispositions of partnership interests
- Cross-border tax issues
- Winding-up partnerships

12:20 Questions and Discussion

12:30 Networking Lunch

1:30 Taxation of Trusts

Stephanie J. Daniels
Farris, Vaughan, Wills & Murphy LLP

- Rules of taxation of personal trusts
- Taxation of graduated-rate estates
- Taxation of *inter vivos* trusts
- Attribution rules and the "kiddie" tax

2:20 Questions and Discussion

2:30 Refreshment Adjournment

2:45 Anti-Avoidance Rules for Common Business Structures

David Christian
Thorsteinssons LLP

- Tips for navigating section 84.1 of the *Income Tax Act*
- Tips for navigating section 55 of the *Income Tax Act*

3:35 Questions and Discussion

3:45 Panel Discussion: Analyzing and Exploring a Complex Fact Pattern

- A discussion between the faculty and delegates on a mind-bending fact pattern that incorporates the taxation of all common business structures

4:45 Chair's Closing Remarks

4:50 Program Concludes

INFORMATION

Four Ways to Register:

1. Telephone us: 604-730-2500 or toll free 877-730-2555
2. Fax us: 604-730-5085 or toll free 866-730-5085
3. Mail your registration form with payment
4. Register at www.pbli.com/1327

Registration: The registration fee is \$770.00 plus GST of \$38.50 totalling **\$808.50** covering your attendance at the program (in person or by live webinar), written materials, a light breakfast, a networking lunch and refreshments throughout the day.

Early Bird Discount: Register by January 23rd, 2017 and receive a \$100 discount on registration fee (\$670.00 plus GST).

Group Discount: Register four persons from the same organization at the same time and you are entitled to a complimentary fifth registration. Early Bird and Group Discount cannot be combined.

Payment: You may pay by VISA, MasterCard or cheque. Cheques should be made payable to the Pacific Business & Law Institute. Registration fees must be paid prior to the program.

When and Where: Check-in begins at 8:30 a.m. The program starts at **9:00 a.m.** UBC Robson Square is located at the basement level of 800 Robson Street in Vancouver, BC. Please visit <http://www.robsonsquare.ubc.ca/find-us/> for directions.

Materials: The faculty will prepare papers and/or other materials explaining many of the points raised during this program. Materials will be available for pick-up at the program. Please contact us at registrations@pbli.com if you are unable to attend the program and wish to purchase a set of materials.

Your Privacy: We will keep all information that you provide to us in strict confidence, other than to prepare a delegate list containing your name, title, firm and city for our faculty and the program delegates. We do not share our mailing lists with any non-affiliated organization.

Cancellations: Full refunds will be given for cancellations (less a \$60.00 administration fee) if notice is received in writing five full business days prior to the program (**February 15th, 2017**). After that time we are unable to refund registration fees. Substitutions will be permitted. We reserve the right to cancel, change or revise the date, faculty, content, availability of webinar or venue for this event.

Course Accreditation: Attendance at this course can be listed for up to **6.5 hours** of continuing professional development with the Law Society of BC.

Registration Form Pacific Business & Law Institute

Unit 2 - 2246 Spruce Street
Vancouver, BC Canada V6H 2P3
Telephone: 604-730-2500; Fax: 604-730-5085
E-mail: registrations@pbli.com

TAXATION OF COMMON BUSINESS STRUCTURES

February 22nd, 2017
UBC Robson Square • Vancouver, BC

In person Live webinar

Salute	First Name	Last Name	Position/Title
Firm/Company			
Address			
City	Province/Territory	Postal Code	
Telephone	Fax		Email
Paid by:	<input type="checkbox"/> VISA	<input type="checkbox"/> MasterCard	<input type="checkbox"/> Cheque payable to Pacific Business & Law Institute
Card Number	/	/	Expiry Date

Please indicate your areas of interest for future notifications (select all that apply):

Banking Wealth Management Business Law Financial Planning Tax Other _____

How did you hear about this program?

Brochure Email Colleague PBLI Website Other _____

Register today at www.pbli.com/1327

Please recycle