

# 2020 TSG CONFERENCE HILTON TORONTO

145 Richmond St. West, Toronto, ON M5H 2L2 Tel: (416) 869-3456 Fax: (416) 869-3187

## JANUARY 19 - 21, 2020 *P R O G R A M*

<b>SUNDAY, JANUARY 19, 2020</b> <b>MEETING ROOM: OSGOODE ROOM, 3<sup>rd</sup> FLOOR</b> <b>MEAL ROOM: RICHMOND ROOM, 3<sup>rd</sup> FLOOR</b> <b>(SAME LOCATION FOR DURATION OF CONFERENCE)</b>		
TIME	TOPIC/ITEM	PRESENTERS
8:00 AM – 9:00 AM	<b>BREAKFAST</b> <i>Buffet</i>	
9:00 AM – 10:30 PM	1. TOSI, the unanswered questions, CRA’s contradictory positions and what may be the correct answers.	<b>Sunny Jaggi</b> <b>Kenneth Keung</b> <b>Henry Shew</b>
10:30 AM – 11:00 AM	<b>BREAK</b>	
11:00 AM – 12:30 PM	2. Multi-lateral Instrument, what are the key points to know and how do you find out about them.	<b>Nadia Rusak</b> <b>Nancy Yan</b>
12:30 PM – 1:30 PM	<b>LUNCH</b> <i>Buffet Lunch</i>	
1:30 PM – 2:20 PM	3. Owner-Manager tax practice, is there a “best” structure	<b>Kim Moody</b> <b>Peter Lewis</b>
2:20 PM – 3:00 PM	4. Passive income rules, tax planning ideas	<b>Alex Ghani</b>
3:00 PM – 3:40 PM	5. Capital gains strips, how to do it and how risky is it?	<b>Hugh Woolley</b> <b>Shelagh Rinald</b>
3:40 PM – 4:00 PM	<b>BREAK</b>	

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4:00 PM – 5:00 PM	6. Taxation at death, 10 special rules you need to know	<b>Grace Chow</b> <b>Matthew Cho</b>
5:00 PM – 5:20 PM	<b>Open Session</b>	
7:30 PM	<b><i>DINNER</i></b> <b><i>Biffs Bistro</i></b> 4 Front St E, Toronto, ON M5E 1G4 <b>Website:</b> <a href="http://biffsbistro.com">biffsbistro.com</a> <b>Phone:</b> (416) 860-0086	

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## JANUARY 19 - 21, 2020 PROGRAM

MONDAY, JANUARY 20, 2020		
TIME	TOPIC/ITEM	PRESENTERS
8:00 AM – 9:00 AM	<b>BREAKFAST</b> <i>Buffet</i>	
9:00 AM – 10:40 AM	7. GAAR Cases, what are the trends where taxpayers win and lose on bona-fide non-tax purpose and no misuse or abuse.	<b>Jonathan Richler</b> <b>Ian Pryor</b> <b>Nancy Thandi</b> <b>Michael Cadesky</b>
10:40 AM – 11:00 AM	<b>BREAK</b>	
11:00 AM – 11:40 AM	8. The hole in subsection 15(1), how big is it, and is it filled by paragraph 15(1.4)(c)? If so how? What about subsection 56(2)? Can you tax a non-resident (subsections 15(7) and 214(3))?	<b>Manu Kakkar</b> <b>Kenneth Keung</b>
11:40 AM – 12:30 PM	9. Family Law, do trusts provide protection. If not, what does?	<b>Nathalie Boutet</b> <b>Sebastian Desmarais</b>
12:30 PM – 1:30 PM	<b>LUNCH</b>	
1:30 PM – 2:30 PM	10. Cases of Interest in 2019, a fast paced review	<b>David Sherman</b>
2:30 PM – 3:40 PM	11. U.S. tax changes from 2017 have changed how Canadians approach U.S. structures, a panel discussion about how and why.	<b>Galia Antebi</b> <b>Cassandra Lopes</b> <b>Peter Weissman</b> <b>Marco Jotic</b>
3:40 PM – 4:00 PM	<b>BREAK</b>	

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4:00 PM – 5:00 PM	12. U.S. Inversions, what are they and what are the results	<b>Andreas Apostolides</b> <b>Michael Cadesky</b>
5:00 PM – 5:20 PM	<b>Open Forum</b>	
7:30 PM	<b>DINNER</b> <b>Lena Restaurant</b> 176 Yonge St, Toronto, ON M5C 2L7 <b>Website:</b> <a href="http://lenarestaurante.com">lenarestaurante.com</a> <b>Phone:</b> (416) 507-3378	

### TUESDAY, JANUARY 21, 2020

TIME	TOPIC/ITEM	PRESENTERS
8:00 AM – 9:00 AM	<b>BREAKFAST</b> <b>Buffet</b>	
9:00 AM – 10:00 AM	13. Technical interpretations of interest in 2019	<b>Hugh Woolley</b> <b>Nathan Wright</b>
10:00 AM – 11:00 AM	14. CTF Roundtable, highlights of past few years.	<b>Peter Weissman</b> <b>Kim Moody</b>
11:00 AM – 11:30 AM	<b>BREAK AND CHECKOUT</b>	
11:30 AM – 12:30 PM	15. Dealing with the new CRA; has CRA changed, in what ways, what are the implications?	<b>Open Discussions</b>
12:30 PM	<b>LUNCH</b> <b>Grab and Go</b>	
	<b>CONFERENCE ADJOURNS</b>	