Contributors to the Tax Risk Management Guide

The authors wish to thank the many contributors to this edition of the *Tax Risk Management Guide*:

- Dan Jakubowicz and Helen Lakkotrypis, CPA, CA (Chapter 2, Self-Assessment Tools: Tax Risk Questionnaire)
- Sandra Bussey, CPA, CA, CFA, TEP (Chapter 12, Deceased Taxpayers)
- Margaret Riggin, BA, CPA, CA (Chapter 11, Tax Return Preparation portion)
- Maureen Vance, BComm, CPA, CA (Chapter 11, CRA Electronic Services portion)
- Diane Gaudon, FCPA, FCGA (Chapter 15, GST/HST Issues)
- Marilyn Hayre, CPA, CA. BComm (Hons), (Chapter 18, U.S. Corporate Income Tax Issues)
- Ray Kinoshita, CPA, CA (Chapter 18, U.S. Personal Income Tax Issues).

For more information, see About the Authors in this *Guide*.

Practice Aids on Our Website

The Practice Aids in this Guide can be found on the *Tax Risk Management Guide* webpage at www.knotia.ca

The engagement letters included in this *Manual* may not be suitable for all types of engagements. In each case, carefully consider what should be in the engagement letter. For example, a paragraph regarding compliance with the *Personal Information Protection and Electronic Documents Act* (*PIPEDA*) may be recommended.

TRMG Landing Page

For the online user, a landing page will pop up once they log in to their Knotia account. This landing page highlights and provides quick links to several important topics of the *Guide*, such as:

- risk areas pertaining to preparation and filing of income tax returns and forms, information returns and forms, and GST/HST related returns and forms
- risks associated with tax planning / advice services
- risks to be considered while providing tax appeal and litigation services.

The landing page also contains links to many other useful tax resources from CPA Canada, the CRA, and the leading accounting firms, in an effort to build a comprehensive information centre to facilitate practitioners' needs on tax information updates and research.

We Welcome Your Comments

We hope that *CPA Canada Tax Risk Management Guide* will continue to meet your practice needs. The authors, Brian J. Wilson, BComm, LLB, CPA, CA, TEP, Nancy Jane Bullis, BA, LLB, LLM, and the publisher, CPA Canada, appreciate hearing from subscribers and we will continue to respond to your valued comments and suggestions. Your feedback is important to us as it enhances our ability to meet our goals in making the *Guide* a practical and useful reference tool for you.

Please send your comments to our attention by e-mail at trmg@cpacanada.ca.

Except where otherwise noted, the legislation is current to June 30, 2017.

Yours very truly,

Brian J. Wilson Nancy Jane Bullis

About the Authors

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Primary Author

Brian is a partner in the law firm Wilson, Vukelich in Markham, Ontario. He provides domestic and international tax planning for individuals and businesses. He is a past lecturer and co-coordinator of the CPA Canada In-Depth Tax Course and the Wealth Preservation and Accumulation for Canadians Tax Course. Brian also writes and speaks extensively to various business and professional groups, including CPA Ontario, CPA Canada, the Canadian Bar Association, the Law Society of Upper Canada, The Society of Trust and Estate Practitioners, the Canadian Tax Foundation and York University.

Brian is the co-author of several CPA Canada publications, including:

- *Professional Services Checklists Collection*
- *Model Agreements, Resolutions and Contracts*
- *Tax Planning Using Family Trusts*
- *The Family Trust Guide*, and
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Nancy is the co-author of several CPA Canada publications, including:

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She is also a contributor to CPA Canada's *A Guide to Financial Decisions Planning for the End of Life*.

Prior to attending law school, Nancy worked as an editor and journalist. During that time she earned her Certificate in Magazine Journalism from Ryerson Polytechnic Institute. She entered the research and writing Master of Laws program in Tax Law at Osgoode Hall, York University in 2001, which she completed in 2004. Nancy is a member of the Law Society of Upper Canada, League of Canadian Poets, Canadian Coalition for the Rights of Children and the Canadian Tax Foundation.

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Co-Author of Chapter 11: Tax Return Preparation and CRA Electronic Services

Margaret is a sole practitioner in Mississauga, Ontario, practising solely in taxation. She provides tax consulting services to small CPA firms and sole practitioners without specialized tax expertise. She also provides tax planning and compliance services to individuals and businesses. Margaret presents many taxation professional development courses for Chartered Professional Accountants of Ontario and has also authored and mentored such courses. She is a part-time faculty member in the Administrative Studies Program, Faculty of Liberal Arts and Professional Studies, York University, Toronto. She speaks regularly to various business and professional groups.

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As one of the original Taxprep® employees, Maureen has been involved with all aspects of tax software development and support, including managing various software products. She has completed the CPA Canada In-Depth Tax Course and currently acts as a consultant to Wolters Kluwer Canada on tax and compliance issues. Maureen researches and writes material for training and program documentation and presents seminars and webinars on various tax and software topics to accounting firms across Canada. She is a member of the CRA-CPA Canada Technology Working Group and has been a frequent contributor to the Wolters Kluwer Canada publication *Tax Topics*.

Diane Gaudon, FCPA, FCGA

Author of Chapter 15: GST/HST Issues

Diane Gaudon has her own business providing GST, HST, QST and provincial sales tax advice and training to companies of all sizes across North America. For more than 30 years she has gained extensive accounting and taxation expertise spanning many industries.

She is a very popular speaker who frequently presents commodity tax-related material to numerous professional organizations. Diane has authored numerous publications and courses. In addition, Diane was a member of the Ontario provincial government HST Implementation Committee.

Sandra Bussey, CPA, CA, CFA, TEP

Author of Chapter 12: Deceased Taxpayers

Sandra Bussey is a Chartered Professional Accountant, Chartered Accountant and a former tax partner at a national CA firm with over 25 years of experience in the area of tax and estate planning for individuals and tax planning for privately held corporations. She is currently working with a financial institution providing financial, tax and estate planning for investment clients. Sandra holds a Bachelor of Commerce degree from the University of Alberta and is a member of the Society of Trust and Estate Practitioners. She has co-authored several editions of the CCH publication, *Death of a Taxpayer*, with Suzanne Hanson, the most recent being the 10th edition published in November 2012.

Marilyn Hayre, CPA, CA, BComm (Hons)
Grant Thornton LLP: Partner, U.S. Tax Services

Co-Author of Chapter 18: Taxation in the United States

Marilyn is a partner and leader of the U.S. Corporate Tax Services team for Grant Thornton, LLP in Atlantic Canada. Marilyn spent the first 16 years of her career with a Big Four accounting firm in New Brunswick and then transferred to Grant Thornton LLP in 1997.

Marilyn specializes in advising Canadian companies on their U.S. operations and business activities. She assists her clients with structuring their U.S. operations in a tax-efficient manner, the use of U.S. branches and subsidiaries, financing U.S. operations and business acquisitions. She advises her clients on U.S. federal and state filing tax requirements, and she and her team prepare U.S. tax returns for corporations, partnerships and limited liability companies.

Marilyn is a CPA, having obtained her CA in 1984.

Ray Kinoshita, CPA, CA
Grant Thornton LLP: Senior Manager, Tax

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A U.S. tax partner in the Toronto office of Grant Thornton, LLP from 2007 through his official retirement from the partnership at the end of 2015, Ray is continuing with Grant Thornton as a full-time employee. Ray has practised in the area of Canadian and U.S. personal and corporate cross-border taxation since 1983.

Ray was previously a U.S. tax partner with a Big Four firm in Toronto and has worked in the areas of U.S. expatriate taxation for U.S. citizens in Canada and elsewhere outside the United States, particularly in Europe, having begun the U.S. expatriate tax practice in the Netherlands with his former firm, and also in Australia, Asia and Africa in his practice today. In the expatriate realm, Ray's clients have included real estate companies, mining companies, manufacturers, software and hardware vendors and companies providing services in the United States, ranging from large public companies to small owner-managed businesses and start-ups. Ray has also provided advice on cross-border financing and holding structures, acquisitions and divestitures and restructuring to improve tax efficiency. He continues to provide advice regarding structures for holding U.S. real estate and other matters of interest to Canadians investing, working or otherwise spending time in the United States.

A graduate of Yale University and the University of Windsor, Ray obtained his CA designation in 1983. Ray has been an instructor at the CPA Canada In-Depth Tax Course, written articles for the *Canadian Tax Journal*, spoken at the Canadian Tax Foundation Annual Conference and for CPA Ontario on various aspects of U.S. taxation that are of significance for Canadians.

Dan Jakubowicz

Co-creator of the Task Risk Questionnaire (TRQ)

Dan is a senior tax advisor with 40 years of service in the public accounting industry. For the last six years, Dan has been self-employed, advising small and medium-sized professional practices, and providing services to owner-managed businesses. Prior to this, Dan was a tax partner with KPMG for 21 years.

In his last six years at KPMG, Dan was the national risk management partner for taxation services. As a result, he has extensive experience in the design, implementation and monitoring of risk management and quality control policies and procedures in professional firms.

Dan is also an experienced educator at university and industry levels.

Helen Lakkotrypis, CPA, CA

Co-creator of the Tax Risk Questionnaire (TRQ)

Helen is an income tax practitioner with 24 years of experience. The first 18 years of her career were spent at a large multi-national CA firm, advising clients on matters of income taxation. During the last six years, she has been practising as a self-employed advisor to small and medium-sized businesses as well as other public accountants.

Her vast experience includes, among other matters, tax education and tax risk management. She has served as a part-time lecturer at the University of Toronto and facilitated a number of professional tax courses offered by CPA Canada and CPA Ontario during her career. In addition, she was responsible for tax risk management matters and tax education for the GTA tax group at the firm at which she was employed. Helen has served as a consultant to CPA Canada for the last six years in matters related to tax risk management including the "Best Practices in Tax" initiative.