

December 11, 2013
St. Andrew's Club and Conference Centre, Toronto, ON

TAX LITIGATION FORUM

What You Have Not Heard This Year

www.insightinfo.com/TaxLit

PROGRAM CO-CHAIRS:



David W. Chodikoff
Partner
Miller Thomson LLP



David E. Spiro
Counsel
Dentons LLP



Dear Colleague,

As the Canada Revenue Agency becomes increasingly aggressive in pursuit of perceived domestic and offshore tax avoidance, it is more important than ever to be familiar with recent developments in legislation, policy and procedure. Both of us are, therefore, delighted to chair this tax litigation conference – the first organized by Insight Information. Since we started practicing law, we have looked to Insight conferences as one of the most current and reliable sources of information on any particular area of the law – and this conference will be no exception.

We've gathered leading litigators and clients to participate in lively panel discussions covering a wide range of challenging issues - from how to deal with CRA requirements and misconduct to making successful voluntary disclosure applications and fairness requests. You'll learn about the latest developments in transfer pricing and the GAAR and will find out how project management can help you win your case. Finally, for those cases that can be resolved before trial, we'll explore when and how to take advantage of the opportunities for settlement. In short, we'll give you the tools to resolve tax controversies more confidently than ever!

David W. Chodikoff

Partner
Miller Thomson LLP

David E. Spiro

Counsel
Dentons LLP



DISTINGUISHED FACULTY:

Peter Aprile

Principal, ATX Law

Jacques Bernier

Partner, Baker & McKenzie LLP

Alexandra Brown

Partner, Laishley Reed LLP

James (Jim) Grundy

Chief Financial Officer, NRT Technology Inc.

Robert Kepes

Partner, Morris, Kepes, Winters LLP

Sabina Mexis

Director, Tax & Estate Planning, Zeifmans LLP

David Muha

Partner, Deloitte Tax Law LLP

Alan Schwartz

Partner, Fasken Martineau LLP

Curtis Stewart

Partner, Deloitte Tax Law LLP

Mark Tonkovich

Associate, Baker & McKenzie LLP

Richard Tremblay

Partner, Osler, Hoskin & Harcourt LLP

Alan Wheable

Former Senior Vice President, Taxation, TD Bank Group

Who Should Attend

- Law Firms:
 - Partners
 - Junior Partners
 - Associates
- Areas of Practice:
 - Tax
 - Tax Litigation
 - Corporate Tax
 - Dispute Resolution
 - Transfer Pricing
- Industry:
 - Counsel
 - In-house counsel
 - Head of Tax
 - Tax Director
 - Head of Corporate Tax
 - Tax Accountant
 - Tax Advisor

December 11, 2013

7:45 | Registration and Continental Breakfast

8:20 | Welcome Remarks from Insight Information

8:25 | Co-Chairs' Opening Remarks

8:30 | **Project Management in Tax Litigation**

David Spiro

Counsel, Dentons Canada LLP

Alan Wheable

Former Senior Vice President, Taxation, TD Bank Group

- Dealing with Tax Directors and General Counsel
- Cost estimates and cost containment
- Alternatives to the traditional hourly fee

9:15 | **Requirements and Their Enforceability**

David Muha

Partner, Deloitte Tax Law LLP

- Domestic and foreign-based requirements
- Enforcement tools and defences
- Current cases

10:00 | Networking Coffee Break

10:15 | **Settlements**

James (Jim) Grundy

Chief Financial Officer, NRT Technology Inc.

David Chodikoff

Partner, Miller Thomson LLP

- What is a "principled" settlement?
- The role of the settlement conference
- Settlements and costs awards

11:00 | **CRA Misconduct**

Jacques Bernier

Partner, Baker & McKenzie LLP

Mark Tonkovich

Associate, Baker & McKenzie LLP

- Internal controls within the CRA
- The role of the Federal Court and provincial superior courts
- The role of the Tax Court

11:45 | **Fairness Requests: Relief from Interest & Penalties**

David Chodikoff

Partner, Miller Thomson LLP

Peter Aprile

Principal, ATX Law

- The guidelines
- Presenting a persuasive case
- Recent policy changes

12:15 | Networking Luncheon

1:15 | **Collections Issues**

Sabina Mexis

Director, Tax & Estate Planning, Zeifmans LLP

Robert Kepes

Partner, Morris, Kepes, Winters LLP

- Section 160 assessments
- Director's liability assessments: where are we now?
- Dealing successfully with CRA collections

2:15 | **Litigating the General Anti-Avoidance Rule**

Alexandra Brown

Partner, Laishley Reed LLP

Alan Schwartz

Partner, Fasken Martineau LLP

- The role of pleadings
- Examinations for discovery
- Evidence and argument

3:00 | Networking Coffee Break

3:15 | **Transfer Pricing Disputes**

Richard Tremblay

Partner, Osler, Hoskin & Harcourt LLP

- Preparing the cases
- The role of the expert(s)
- The changing transfer pricing landscape

4:15 | **Voluntary Disclosures**

Curtis Stewart

Partner, Deloitte Tax Law LLP (Tentatively Confirmed)

- Best practices
- Recent developments
- Future directions

5:00 | Conference Concludes

Register Online at www.InsightInfo.com/TaxLit

Conference Code: TXC13937 PROMO CODE:

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REGISTRATION FEE: Includes meals, documentation and **InConference**, fully searchable online access to this conference's papers. Please allow 2 weeks after conference for activation of login and password.
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Early Bird Price (Register and pay by November 1st, 2013) \$1,195.00 +HST (\$155.35) = \$1,350.35

Conference Price \$1,395.00 +HST (\$181.35) = \$1,576.35

Dietary Restrictions: Do you have any dietary restrictions?

No Yes

If yes, please indicate: _____

Special Needs: Do you have any special needs that require accommodation?

No Yes

If yes, please indicate: _____

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