In-Depth Tax Course

Producing tomorrow’s most highly skilled and confident tax professionals

Superior academic rigour
Contemporary business application

“Advancing Tax Excellence in Canada for over 35 years”

Distinguished faculty of tax experts and trusted advisors to bridge theory and practice
“Chartered Professional Accountants of Canada's (CPA Canada) In-Depth Tax Course has a deep history and has been endorsed by professionals in accounting and legal firms, corporate Canada, and regulatory and government agencies for the extensive benefits that it has provided for over 35 years. Rich in content, the In-Depth Tax Course has a well-balanced educational structure with a proven blend of learning methodologies including elearning, self-study ebooks, problems and case studies, online discussions, lectures from leading authorities and interactive small-group tutorials. The In-Depth Tax Course continues to be Canada's leading and most comprehensive on-the-job tax training program.”

IAN SHERMAN, FCPA, FCA
Tax Partner, Ernst & Young
Ottawa, ON
Chair – CPA Canada Income Tax Education Committee
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Participation at the In-Depth Tax Course (In-Depth) is a career accelerator – a truly transformational learning experience. In-Depth was recently re-designed to deliver the optimal balance of academic rigour and real-life business application. The three-year program will be delivered using a blended learning methodology with the latest in education delivery technology, incorporating the ideal mix of self-study, elearning, online discussion forums, technical lectures and group sessions with context-rich case studies.

“A"In my view, CPA Canada’s In-Depth Tax Course is an absolute must for any tax practitioner. It has allowed me to hone my technical skills in a number of areas of tax that I would never have otherwise been exposed to, and perhaps even more importantly, has given me the opportunity to build my professional network and to reach out to other practitioners with different backgrounds and areas of expertise.”

MARK DUMALSKI, CPA, CA
Senior Manager, Deloitte Ottawa, ON
Course Benefits

In today’s complex global economy, advisory firms, corporations and regulators are demanding a new kind of tax professional. The successful Tax Professional is one with a strong, sound level of technical knowledge and well-developed skills in research, communication, interpretation and creative thinking.

Participation at In-Depth will provide you with many benefits....

1. Experience a multidimensional approach to learning, with technical lectures, small/large group sessions, real-life case studies, ebooks and elearning modules, and online discussion groups.

2. Learn from lecture and tutorial leader teams with extraordinary technical tax knowledge and a wealth of real-world business experience.

3. Follow the most current, and marketplace-ready curriculum in Canada – a competency based curriculum built to create the most highly valued professionals in the tax community.

4. Build a valuable peer network with some of the brightest and most promising tax professionals from public practice, from industry and from regulatory environments.

5. Begin to build a library of comprehensive tax reference materials, annotated with your personal insights and perspectives from In-Depth – a valuable asset you will use many times in the future.

Participation at In-Depth will provide your organization with many benefits....

1. See immediate impact as your student progresses through In-Depth.

2. Receive relevant, timely and useful reports on your student’s progress throughout the three-year program.

3. Provide a unique setting in which to accelerate the development of your new tax professionals.

4. Discern quick, out-of-the-gate value from your student after the In-Depth kick-off orientation session focused on tax research, statutory interpretation and communication skills.

5. Leverage your training investment by realizing an increased return on your investment with noticeable increases in productivity from your students each time they return from sessions to integrate their new knowledge and skills into real-life client and corporate work.

Certificate Of Achievement

Students who successfully complete CPA Canada’s In-Depth Tax Course will receive a CPA Canada Certificate of Achievement in Tax Education, a recognized symbol of excellence in continuing education for tax practitioners in Canada.
Course Overview

Always Current, Always Relevant, Always Practical Content....

*In-Depth* provides the most comprehensive, practical and relevant income tax training in Canada! *In-Depth* is the training ground of choice for Canada’s professional accountants and other qualified professionals who are serious about working and excelling in today’s complex tax environment, and completion of *In-Depth* has become essential for many seeking senior tax positions in advisory firms and corporate Canada.

The *In-Depth* curriculum is extensive and complete, and delivers the fundamental tax knowledge you need to kick-start a long and successful career as a tax professional.

*In-Depth*, CPA Canada’s flagship taxation training program, has left a lasting impact on over 15,000 young professionals and their employers over three decades.

"I would recommend the *In-Depth Tax Course* to anyone who is interested in becoming a tax practitioner or in advancing their career in the tax profession. It provided me with the skills and knowledge I needed to further my career in becoming a trusted tax advisor and gave me the opportunity to expand my network with other professionals from various practice areas. It has increased my awareness in identifying potential tax issues and new opportunities to better serve my clients’ needs.”

LING NGAN, CA
Manager, Tax, KPMG LLP
Edmonton, AB
Who Attends *In-Depth*?

*In-Depth* provides an incomparable learning, sharing and networking opportunity for Canadian tax professionals working full time in Canadian income tax, in a public accounting firm, a legal firm, a corporate setting, a regulatory or a government environment.

More than 15,000 young professionals have benefited from *In-Depth*. Here are some of the organizations that supported them.

3M Canada Company  
ADP Canada  
Air Canada  
Alberta Ministry of Finance  
Algota Steel Inc.  
American Express Canada Inc.  
AT&T Enterprises Canada Co.  
Atomic Energy of Canada Ltd.  
Baker & McKenzie LLP  
Bank of Montreal  
Bayer Inc.  
BC Hydro  
BDO Canada LLP  
Bell Canada  
Bennett Jones LLP  
Berger Belanger  
Bessner, Gallay, Kreisman LLP  
Best Buy Canada Ltd.  
Blake, Cassels & Graydon LLP  
Borden Ladner Gervais LLP  
BP Canada Energy Company  
Bridgestone/Firestone Canada Inc.  
Brookfield Asset Management Inc.  
Bull, Housser & Tupper LLP  
Cadesky and Associates LLP  
Camacho Corporation  
Canada Broadcasting Corporation  
Canada Revenue Agency  
Canadian Pacific Railway Co.  
Canadian Tire Corporation Limited  
CanWest Limited Partnership  
Cassels Brock & Blackwell LLP  
Catalyst LLP Chartered Accountants  
CCH Canadian Limited  
Celestica  
CGI Information Systems and Management Consultants  
CHC Helicopter Corporation  
Chrysler Canada Inc.  
CIBC  
Citibank Canada  
City of Calgary  
City of St. John’s  
City of Winnipeg  
Coca-Cola Bottling Company  
Confederation Des Caisses Populaire  
ConocoPhillips Canada  
Costco Wholesale Canada Ltd.  
Couzin-Taylor LLP  
Davies Ward Phillips & Vineberg LLP  
Deloitte LLP  
Department of Finance Canada  
Enbridge Inc.  
Encana Corporation  
Ernst & Young LLP  
Federal Court of Appeal  
Felesky Flynn LLP  
Fraser Milner Casgrain LLP  
General Electric Canada  
General Mills Canada  
General Motors of Canada  
George Weston Ltd.  
Giant Tiger Stores Limited  
Ginsberg Gluzman Fage & Levitz LLP  
Grant Thornton LLP  
Hudson’s Bay Company  
Husky Oil  
Hyundai Auto Canada  
IBM Canada Ltd.  
J.D. Irving Limited  
J.S. Redpath Limited  
KPMG LLP  
Kraft Canada Inc.  
Lafarge Canada Inc.  
Lang Michener LLP  
MacKay LLP  
Mallette SENC  
Manulife Financial Corporation  
McCain Foods Limited  
McCarthy Tetrault LLP  
MNP LLP  
Miller Thomson LLP  
Ministere du Revenu du Quebec  
Ministere Finances du Quebec  
Molson Canada  
Nortel Networks Limited  
Office of the Auditor General of Canada  
OMERS  
Ontario Ministry of Finance  
Ontario Ministry of Revenue  
Osler, Hoskin & Harcourt LLP  
Oxford Property Group Inc.  
Philips Electronics Ltd.  
Potash Corporation  
Pratt & Whitney Canada Corporation  
PricewaterhouseCoopers LLP  
Raymond Chabot Grant Thornton LLP  
Research In Motion  
Rio Tinto Canada  
Rogers Communications Inc.  
Royal Bank of Canada  
RSM Richter Chamberland LLP  
Schwartz Levitsky Feldman LLP  
Scotia Bank Ltd.  
Shell Canada Limited  
Shoppers Drug Mart  
Siemens Canada Limited  
SNC-Lavalin Group Inc  
Sobeys Inc.  
Sun Life Financial  
Tax Court of Canada  
Thorsteinssons LLP  
Tim Hortons Inc.  
Toronto Dominion Bank  
TSX Group  
University of Calgary  
University of Toronto  
Walmart Canada Corp.  
Weyerhaeuser Company Limited
Your Three-Year Study Plan

Schedule Begins in September 2014

The underlying philosophy of In-Depth is one of integration - an essential blend of ebook reference materials and elearning modules with assessments, of social media interaction between students and Group Leaders, of traditional classroom lectures, context-rich case studies and exercises in facilitated small-group tutorial sessions – AND tying it all together with a strong link to on-the-job experience.

In-Depth is an unparalleled learning and professional development experience for progressive professionals who are serious about a career in taxation. It demands a major commitment and delivers unrivaled results to students and their organizations.

Student Schedule
Integrating elearning, social media, classroom and small group tutorials

<table>
<thead>
<tr>
<th>YEAR</th>
<th>SEPTMBER/OCTOBER 2014</th>
<th>FALL/WINTER 2014/15</th>
<th>SUMMER/FALL 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Orientation, Research and Communications Skills for Today's Tax Professional.</td>
<td>Group Study 1 • elearning • facilitated online discussion forums • facilitated group meetings</td>
<td>In-Residence 1 • seven-day in-residence classroom sessions • small, facilitated group workshops</td>
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<tr>
<td></td>
<td>• three-day interactive classroom session</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Group Study 2 • elearning modules • facilitated online discussion forums • facilitated group meetings</td>
<td>In-Residence 2 • seven-day in-residence classroom sessions • small, facilitated group workshops</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Group Study 3 • elearning modules • facilitated online discussion forums Year 3 Project</td>
<td>In-Residence 3 • seven-day in-residence classroom sessions • small, facilitated group workshops</td>
<td></td>
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Orientation, Research and Communications Skills for Today's Tax Professional (ORC)

September/October, 2014

Presentations will be held in Toronto, Calgary, Montreal and Vancouver.

ORC SnapShot
- In-Depth Orientation
- Tax Case Analysis and Statutory Interpretation
- Comprehensive Tax Research and File Processes
- The Canadian Tax Environment

Group Study 1

Fall and Winter, 2014-2015

Access to Group Study 1 elearning modules, ebook self-study content, and case studies will be available immediately after ORC sessions have been completed. Group Study 1 will begin in October 2014.

Group Study 1 consists of three elearning modules including self-assessment checkpoints. Completion of each elearning module is followed by scheduled online discussions, then local, facilitated group sessions that feature a series of case studies and exercises designed to illustrate the application of technical knowledge to contemporary business scenarios. The objective of the sessions and activities is to provide valuable continuity in your learning between self-study, elearning and group sessions.

Group Study 1 SnapShot
- Individual Taxation
  - Residency of an Individual
  - Emigration and Immigration
  - Employment Income
  - Taxable Benefits
  - Deferring Income Plans
- Business and Property Taxation
  - Residency of a Corporation
  - Business Income for Tax Purposes
  - Income vs. Capital
  - Taxation of Professionals
- Capital Gains
  - Adjusted Cost Base Calculation Rules
  - Principal Residence Designations
  - Change in use Designations
  - Capital Gains Exemption

In-Residence 1

Sessions presented in July, August, and September 2015

In-Residence 1 completes your first year of In-Depth. Presentations will be held regionally, in British Columbia, Ontario and Quebec.

In-Residence 1 includes 14 technical lectures, two large-group comprehensive case-study sessions and smaller, facilitated group tutorials where you will learn how to develop new approaches to solving complex tax problems and capitalize on tax planning opportunities for your clients and your organization.

A major commitment is demanded from each student at In-Residence 1, and lectures and tutorials are scheduled to allow opportunities and downtime in the evenings to reflect and re-energize by networking with other students, tutorial leaders and lecturers, and participate in local activities.

In-Residence 1 SnapShot
- Revisiting Statutory Interpretation and Case Law Analysis
- Losses
- Acquisition of Control Rules
- Corporate Taxation – The Basics
- Shareholder Taxation
- Compensation Planning
- Interest Deductibility – An Introduction
- Taxation of Partnerships
- Taxation of Trusts
- Tax Administration

Note: Tutorial Leaders will be submitting feedback on your performance at In-Residence sessions, years 1 to 3, including level of interaction, participation and communication during tutorials, attendance and general engagement during the week. Feedback will be taken into consideration for assessing successful completion of the course.

Group Study Components

ELEARNING MODULES
SOCIAL MEDIA
IN-PERSON SESSIONS

ON THE JOB EXPERIENCE

Note: Group Study Leaders will be submitting feedback on your performance during Group Study, years 1 to 3, including level of interaction, participation and communication during discussion boards and in-person sessions, quality of case study submissions, and attendance. Feedback will be taken into consideration for assessing successful completion of the course.
Group Study 2

Fall and Winter, 2015-2016

Access to Group Study 2 materials will be available in the early Fall of 2015. Group Sessions will begin in October 2015.

Group Study 2 will consist of four elearning lessons including self-assessment checkpoints, four scheduled online discussions, and three local, facilitated in-person sessions.

Group Study 2 SnapShot
- Affiliated Parties and Stop-Loss Rules
- Non-Arm’s-Length Transfer and Other Rules Affecting Corporate Reorganizations
- Paid Up Capital and Surplus Stripping Anti-Avoidance Rules
- Rollover/Reorganization Basics
- Accounting for Income Taxes

In-Residence 2

Summer and Fall, 2016

In-Residence 2 sessions will be presented regionally, in British Columbia, Ontario and Quebec. In-Residence 2 includes 13 technical lectures, two large-group comprehensive case-study sessions and smaller, facilitated group tutorials where you will learn how to develop new approaches to solving complex tax problems and capitalize on tax planning opportunities for your clients and your organization.

In-Residence 2 SnapShot
- Principles and Objectives of Corporate Reorganizations
- Business Combination Basics: Amalgamations and Winding up
- Section 85 Rollovers
- Section 86/51 Reorganizations
- Capital Gains Stripping
- Post Mortem Planning
- Estate Freezes
- International Taxation – Basics
- International Taxation – Inbound Issues
- Cross-border Financing
- GAAR
Year 3 Project

The In-Depth Tax Course features a group project. This project is a cumulative assignment that you will complete in your final year of the Course. The objectives of the Project are to demonstrate that you:

- Understand the subject chosen and its relevance to the course and to taxation;
- Can assess and analyze aspects of the subject;
- Can provide original insights, observations and recommendations; and
- Can communicate findings in written format in a professional manner.

- Each project will be evaluated and assessed and will contribute towards your overall qualification for the Certificate of Achievement at the end of the In-Depth Tax Course.

Group Study 3

Fall and Winter, 2016-2017

Access to Group Study 3 elearning modules and ebook self-study content will be available in October 2016.

Group Study 3 will consist of six elearning lessons including self-assessment checkpoints, and features a series of activities, case studies and exercises designed to illustrate the application of technical knowledge to contemporary business scenarios. Following the completion of each elearning lesson will be an optional online discussion with the Group Study Leader.

These online discussions provide opportunity for issue analysis, discussion and collaboration between students and Group Study Leaders and students.

Group Study 3 SnapShot

- Immigration and Emigration
- Transfer Pricing
- U.S. Tax for the Canadian Practitioner
- SR&ED
- Safe Income and Safe Income on Hand
- Introduction to Indirect Tax Issues

In-Residence 3

Summer and Fall, 2017

In-Residence 3 sessions will be presented regionally, in British Columbia, Ontario and Quebec. In-Residence 3 includes 14 technical lectures, two large-group comprehensive case study sessions and smaller, facilitated group tutorials where you will learn how to develop new approaches to solving complex tax problems and capitalize on tax planning opportunities for your clients and your organization.

In-Residence 3 SnapShot

- Butterfly Reorganizations
- Purchase and Sale of a Business (advanced topics)
- Partnership Formation, Dissolution and Reorganizations
- Debt Forgiveness Rules
- Tax-loss Planning
- Foreign Affiliates
- Foreign Accrual Property Income
- Corporate Reorganizations (specialized topics)
“The In-Depth Tax Course provides us with an excellent source of tax training that can be coordinated with practical hands-on work at BDO. The content, timing and delivery of the course is well suited to our firm and is the cornerstone of our educational program for new tax specialists.”

BRUCE BALL, FCPA, FCA
National Tax Partner, BDO Canada LLP
Toronto, ON

**Locations**

*Orientation, Research and Communications* will be presented in a number of urban centres across Canada.

*Group Study Sessions* are provided in over 20 locations across Canada.

*In-Residence Sessions* will be presented in resort settings in British Columbia, Ontario and Quebec. These centres have been chosen to provide you with a functional and relaxed setting away from your hectic workplace, deadlines and personal responsibilities. It’s the optimal learning environment.
Faculty

The faculty members of In-Depth bring a wealth of technical expertise and direct real-world business experience to the group sessions, classroom and tutorials. The lecturers include some of the most knowledgeable and recognized tax experts in Canada, servicing the most successful individuals and corporations, governments and regulators. They love to teach, have superb platform skills and a genuine desire to share their knowledge and experience with others. The carefully chosen group study and tutorial leaders are experienced professionals with facilitation skills who work exclusively in tax.

The NEW In-Depth Tax Course will feature an unparalleled roster of tax professionals, including:

**BRIAN J. ARNOLD** a senior adviser at the Canadian Tax Foundation. He is a graduate of Harvard Law School (J.D., 1969) and taught tax law at a Canadian law school for many years. He has been a consultant to various governments, the OECD, and the United Nations, and a Visiting Professor at several universities including Harvard Law School from 2005 to 2011, New York University School of Law in 2005 and 2012 and for many years at Sydney and Melbourne Law Schools in Australia.

**EDDY R.A. BURELLO, CPA, CA** who has 28 years of experience in public accounting with Deloitte LLP and specializes in the areas of corporate and personal taxation. Eddy has a broad range of experience in advising private companies and their shareholders on a variety of domestic and international taxation issues. He has advised on acquisition/divestiture strategies, alternative financing arrangements and maximizing shareholder wealth.

**DAVID DOWNIE, CPA, CA** is a partner in the Financial Services Tax group in Toronto and specializes in International Corporate Tax. David's current practice focuses on serving large multinational clients in the financial services sector in Toronto. David has 18 years of experience in public accounting with the last thirteen years as a member of KPMG Canada’s International Corporate Tax Group.

**DAVID GRANT DUFF** Professor and Director of the Graduate Tax Program of the Faculty of Law at the University of British Columbia. David is a graduate of Harvard Law School and taught law at the University of Toronto before joining UBC Law in 2008. David is the author of numerous books and articles on tax issues, including Canadian Income Tax Law and Tax Avoidance in Canada after Canada Trustco and Mathew. We was cited in the Supreme Court of Canada's most recent decision on the General Anti-Avoidance Rule (GAAR): Copthorne Holdings Ltd. v. Canada.

**MARK KAPLAN, CPA, CA** a partner with Ernst & Young’s International Tax/Transaction Advisory Services Practice based in Toronto and specializes in Canadian tax planning for cross-border transactions with a particular focus on Canadian inbound transactions. Mark is a regular instructor for the Canadian Institute of Chartered Accountants’ In-Depth Tax Program. He has also guest lectured for both Osgoode Hall Law School’s Graduate Program in Law and the University of Western Ontario’s Faculty of Law.

**TORRAN JOLLY, CA** is a partner in our Energy Tax group, focusing on energy industry companies. He has participated in tax reorganizations associated with resource acquisitions, dispositions, consolidation and financing. He has extensive knowledge of Canadian income tax legislation related to domestic and international operations and financing (both inbound and outbound investments). Torran has successfully participated with several tax dispute planning and resolution engagements. He has assisted many corporate clients with their tax compliance requirements, and has extensive knowledge regarding deferred income tax accounting standards and tax process controls. Torran has provided assistance regarding the implementation and adoption of various tax accounting standards and is a member of the KPMG’s National Accounting Standards Team.

**KAREN POWER, CPA, CA** a partner with Deloitte LLP and has been providing tax services since 1992. Karen has worked in public accounting and taxation services assisting clients in a variety of tax matters. Karen spent 8 years as a Senior Rulings Officer of the Canada Revenue Agency (CRA) issuing advance income tax rulings and technical interpretations on a broad range of tax matters.

**BARRY F. TRAVERS, FCA** the Business Unit Leader of KPMG LLP’s Western Canada Regional Tax Practice and is based in Edmonton. Barry is a specialist in domestic Corporate Reorganizations and tax planning for large Enterprise business. Barry works with numerous organizations to assist them with tax optimization and efficiency in the areas of stock option planning, corporate divestitures, asset protection planning and estate planning.

**RYAN THULIEN, CPA, CA** a tax partner in the Toronto office of PricewaterhouseCoopers LLP and is the leader of PwC Canada’s Retail and Consumer Product tax practice. His clients include several of Canada's largest retailers in categories such as home improvement, office products, apparel and home goods. Ryan specializes in advising multinational corporations on Canadian corporate income tax matters.

**RONNIE DE ZEN, CPA, CA** a partner in the Tax Services practice of PricewaterhouseCoopers LLP working in the Vancouver office. He specializes in mergers and acquisitions, with a focus on Canadian domestic acquisitions, divestitures and reorganizations as well as the income trust market. Ronnie has served a range of clients in the growing public private partnership industry, as well as the real estate and financial services industries.
Applications for 2014 Orientation, Research and Communications Course and Group Study 1 will be accepted from July 7, 2014 to August 29, 2014. Upon acceptance of your application, CPA Canada will confirm your participation and send you login information for the In-Depth Learning Management System (LMS) where all course materials and information will be posted as they become available.

Orientation, Research and Communications Course (ORC)
ORC will be offered in five centres in 2014 (dates and locations to be confirmed). Location preferences are fulfilled on a first-come, first-served basis. Students are encouraged to register for the location closest to their place of employment.

Group Study 1
Each Group Study 1 Lesson consists of three components: eLearning, online discussion and an in-person group session. After the last ORC session, you can begin working on Group Study 1, Lesson 1. The materials will be available on the In-Depth LMS in mid-October, 2014.

Registration Information and Conditions for the In-Depth Tax Course
Registration for the In-Depth Tax Course opens July 7, 2014 and closes on August 29, 2019. Online registration will be accessible from: www.cpd.cica.ca/incometax.cfm

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Assigned Groups
CPA Canada will assign you to a group based on your location and weekday evening preference. Please note that the assignment of specific evenings will depend on the number of students in a location, the preferred evening of the majority and the necessity to maintain an appropriate mix of students in each group.

CPA Canada will confirm your final registration details, including group, location and specific evening, in mid-October, 2014.

Group Study Dates
Your Group Study Leader will provide you with a schedule of dates for the scheduled online discussion sessions, as well as the in-person group sessions. The first in-person group session may be held as early as late November 2014. You are expected to have successfully completed eLearning Lesson 1, participated in the scheduled online discussion, and completed and submitted the solutions for all the assigned problems before attending your first In-Person Session.

For complete course policies and other information, please visit www.cpd.cica.ca/incometax.cfm
Cancellation Policy

- Application deadline for 2014 students entering In-Depth is August 29, 2014
- Cancellation requests must be received in writing by CPA Canada
- Refunds, less a $300.00 (plus applicable taxes) administrative fee will be issued on written cancellation requests received up to September 30, 2014 for Group Study 1, and up to 15 days prior to the commencement of the Orientation, Research and Communications Course
- No refunds will be issued after these times.

Contact CPA Canada for Additional Information

For general information regarding In-Depth, please call Liza Cruz, Program Administrator – Tax Courses at: 416-204-3378 (or taxcourses@cpacanada.ca). Or, visit our website: www.cpd.cica.ca/incometax.cfm
In-Depth Tax Course

Producing tomorrow’s most highly skilled and confident tax professionals

“Advancing Tax Excellence in Canada for over 35 years”