

VIDEO TAX NEWS

Monthly Tax Update Newsletter

July 2026 — ISSUE 539

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1 Government Releases

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FINANCE RELEASES

1. **June 19, 2026** – The Department of Finance issued a News Release (Legislation passes to implement measures from the Spring Economic Update 2026) announcing that [Bill C-30, Spring Economic Update 2026 Implementation Act](#), received **Royal Assent** on June 18, 2026. Numerous **tax and other measures** from the **Spring Economic Update 2026** and **previous announcements** were included, such as **temporarily suspending** the application of the **federal fuel excise tax on gasoline**, diesel fuel and aviation fuels, effective April 20, 2026 until September 7, 2026 (inclusive), providing temporary **immediate expensing** for eligible **greenhouse buildings**, **denying accelerated CCA** for **zero-emission vehicles** that benefit from the **electric vehicle affordability program** and **reducing** the **base CPP** contribution rate from 9.9% to 9.5%, effective January 1, **2027** (see VTN [537\(8725\)](#)).
2. **June 3, 2026** – The Department of Finance launched a **consultation** on **extending** the **Canadian journalism labour tax credit** to **audio** and **audiovisual news production**. Comments can be submitted to Journalism-Journalisme@fin.gc.ca by July 31, 2026.

whether the journalism labour tax credit should be broadened

CRA RELEASES

1. **June 23, 2026** – CRA released a Tax Tip (Businesses: **Changes** are coming to the way you access **Business Registration Online**) stating that as of **July 14, 2026**, **Business Registration Online** (BRO; see VTN 531(8430)) will **only** be **accessible** through **CRA's online accounts**. This means that all **business numbers** and **CRA program account registrations** must be completed **online** through CRA's account using BRO. **BRO cannot** be used in certain circumstances, including the following:
 - **reactivating** a previously **closed program account**;
 - **registering** a business **owned by another business**, for example, where the partner is a corporation or partnership;
 - **registering** a business when the **owner** or **director** is **deceased**, for example, when an estate needs to file business taxes; and
 - **registering** a Canadian **business** with **only non-resident owners**.
2. **June 18, 2026** – CRA released a Tax Tip (Can't pay your **tax debt** right away? We have options to help you – including the **Manage balance service**) reminding individuals with a **personal income tax** or **COVID-19 benefit debt** of **\$1,000 or more** that they can use the **manage balance service** in My Account to make a full or partial payment, **schedule a series of payments**, **contact a collections officer** or **request a callback**. CRA noted that individuals can now see the **contact information** of the **agent** or officer **assigned** to their account. CRA also noted that balances with an existing payment arrangement will no longer be shown.
3. **June 16, 2026** – CRA updated their **first-time home buyers' (FTHB) GST/HST rebate** webpage to announce that **applications** for the enhanced **Ontario rebate** of up to **\$80,000** can now be filed (see VTN 532(8514)).
4. **June 16, 2026** – CRA released a Tax Tip (Help **speed up** your **disability tax credit application**), reminding taxpayers that **online applications** through **My Account** allow both the taxpayer and medical practitioner to access the form, streamlining the process. In addition, the online form ensures that the most recent version is used.

using CRA's online accounts to obtain new business numbers and program account numbers

collections agents' contact information online

applications for enhanced Ontario rebate can now be submitted

online application submissions to streamline the process

Starting **July 14, 2026**, all disability tax credit **applications** will be required to be filed using the **online application** or by **paper mail** and not through the "submit documents" option in online CRA accounts. If CRA requires additional information, they will contact taxpayers and provide a case reference number to use when submitting supporting documents.

CRA also stated that, as of **September 8, 2026**, **paper applications** submitted using **older versions** of Form **T2201, Disability Tax Credit Certificate** (from before 2023) will **no longer be accepted**.

older versions of the form would not be accepted

5. **June 15, 2026** – CRA released a Tax Tip (The **Voluntary Disclosures Program**: Your second chance to set things right) that discussed some of the **basics** of the **updated VDP** (see VTN **530(8405)**). CRA also addressed **concerns** that **taxpayers may have** regarding program, as follows:

- *I'll be **flagged** for **future audits** if I come forward.* CRA noted that coming forward through the program does **not trigger** increased surveillance of future tax filings.
- *The **process** is **too complex**, I need a tax professional to apply.* CRA noted that a representative can assist with an application but that it is not required.
- *It's probably **not worth it financially**.* CRA noted that the savings on penalties, up to 100%, and significant interest relief for approved applications can be helpful (taxpayers must still pay the underlying tax).
- ***Not sure what to expect**, the outcome feels uncertain.* CRA stated that the updated program was designed to provide greater clarity regarding the relief taxpayers can expect. Taxpayers may also request a pre-disclosure discussion to better understand their situation before applying.

addressing these concerns that clients may have

6. **June 12, 2026** – CRA emailed stakeholders announcing that the **administrative relief** from **penalties** and **interest** relating to **Regulation 105 withholding on certain non-resident subcontractor fee reimbursements** has been **extended** from June 30, 2026 to **March 31, 2027**. In 2024, CRA revised their position to require Regulation 105 withholding on certain subcontractor fee reimbursements (see VTN **515(7732)**). CRA also stated in the email that they are continuing their work to reduce processing times related to the Regulation 105 waiver process (see VTN **537(8726)** for a link to feedback from their consultation). See this LinkedIn **post** by Ryan Minor, Director of Tax at CPA Canada for additional comments.

7. **June 12, 2026** – CRA updated their filing a registered charity information return (T3010) webpage to state that the Charities Directorate is aiming to have **all registered charities** and registered national arts service organizations and/or their representatives **file the T3010, Registered Charity Information Return online beginning in 2027**.

shift to online-only filing by 2027

OTHER RELEASES

1. **June 16, 2026** – The Office of the Taxpayer's Ombudsperson (OTO) announced the release of their **annual report**. The OTO noted a **surge in complaints**, including **delays** and **poor information** from **telephone contact centers**, in **processing T1 adjustments** and in responding to **service complaints**. Other common areas of complaint related to **collections action** and difficulties **accessing online accounts** after being locked out. The **recommendations** included **greater transparency in processing times**, broader access to **callback** and **online chat services** and expansion of **automatic tax filings**.

whether these recurring issues will be addressed and improved

CRA's response to the report indicated **agreement in principle** with most of the OTO's recommendations. They disclosed a **plan to update** their **processing times tool** by March 31, 2027. CRA also indicated that a **new contact centre platform** will be launched in **June 2026** for **business** enquiries and **September 2026** for **individual** and benefits enquiries, after which they will be in a better position to explore expanded service options including callbacks and expanded online chat capabilities. CRA noted that any expansion of automatic tax filings would be determined and communicated by the Minister of Finance and National Revenue.

2. **June 11, 2026** – The Office of the Taxpayer's Ombudsperson (OTO) announced a **systemic examination of delays** in processing **complex T1 adjustments** (47 weeks compared to the service standard of 20 weeks). The OTO also noted that they had sent a **service improvement request** to CRA to change their **T1-ADJ T1 Adjustment Request** webpage to encourage **online submission** rather than **paper adjustment requests**.
3. **June 2, 2026** – The Office of the Taxpayer's Ombudsperson (OTO) announced a **systemic examination of options** for resolving **disputes** with CRA. The announcement expressed concerns that the **options** for resolving **service-related** complaints and **tax disputes** are **not well communicated**, making it **difficult** for taxpayers **to identify the appropriate option** for their situation.

online filing of T1 adjustments

2 Canada's COVID-19 Response

539(2)

COVID-19 BENEFIT ELIGIBILITY ROUND-UP

As CRA continues their **post-payment reviews** related to the **Canada Emergency Response Benefit (CERB)**, **Canada Recovery Benefit (CRB)**, **Canada Recovery Caregiving Benefit (CRCB)**, **Canada Recovery Sickness Benefit (CRSB)** and related programs, the Federal Court also continues to consider applications for judicial review of the reasonableness of CRA's decisions to deny benefits.

Presence in Canada

A May 27, 2026 **Federal Court** case ([Patterson vs. AGC, T-4378-25](#)) found that CRA's **denial** of CRB was **reasonable** as the taxpayer was **not present** in Canada **during** the **benefit period** as legislatively required (Paragraph 3(1)(c) of the CRB Act). While the taxpayer received benefits for the period from September 27, 2020 to October 9, 2021, **information** provided **from** the **Canadian Border Services Agency** indicated that the taxpayer **left Canada** on March 31, 2021 and did not return until June 28, 2021. The fact that the taxpayer **maintained** her **Canadian residency** for tax purposes was irrelevant.

must have been in Canada during benefit period

12-month prior period earnings test

A May 26, 2026 **Federal Court** case ([Green vs. AGC, T-2749-25](#)) found that CRA's **denial** of CERB was **reasonable** as the **\$5,000** prior period earnings test, which was based on the **12-month period** before the date of the initial application, had **not been met**. As the taxpayer's **application** was filed on **September 15, 2020**, only the **period from September 15, 2019** through September 14, 2020 was considered for this "12-month" test. The taxpayer unsuccessfully argued that all income from September 2019 should be considered in the test. The court agreed with CRA's determination of the relevant period, so their conclusion that the taxpayer was ineligible was reasonable.

12-month period test requires a day-by-day calculation

Change in CRA concern – not communicated to the taxpayer

A May 28, 2026 **Federal Court** case ([Ji vs. AGC, T-4861-25](#)) found that CRA's **denial** of CERB was **unreasonable** as the decision was **procedurally unfair**. CRA's initial correspondence indicated that the issue was whether the taxpayer **earned more** than **\$1,000** during the CERB application **periods**. However, the **reviewing officer** developed a **different concern**: that self-employment income reported for all of 2020 may have been earned during the CERB periods. This effectively **changed the case** the taxpayer needed to address, but **CRA did not notify** the **taxpayer** of the **change**.

whether the taxpayer is aware of CRA's specific concern

Foreign documents and CRA record review

A May 21, 2026 **Federal Court** case ([Fazio vs. AGC, T-3431-25](#)) found that CRA's **denial** of CRB and CRSB benefits was **reasonable**. The court stated that the jurisprudence that **tax returns, notices of assessment** and **similar tax documents** are **not conclusive proof of income** for COVID-19 benefit eligibility purposes **applies equally** to similar **foreign tax documents**. The taxpayer's Swedish and Norwegian tax records showing reported income were insufficient on their own to establish eligibility. In addition, the court noted that **CRA reviewers** are **not obligated** to **search** their **records** to locate potentially relevant documents; taxpayers must provide supporting evidence when requested.

CRA not required to search their records to establish eligibility

3 Personal Tax

539(3)

PERSONAL SUPPORT WORKERS (PSWs) – PAYMENT INITIATIVES

In a January 22, 2026 **Technical Interpretation** ([2025-1078871E5](#), Shiri Trop), CRA opined that the **tax treatment** and **reporting requirements** related to **payments** to eligible **PSWs** under a provincial government program depend on the structure and delivery of the program payments.

depends on how the program is structured

Where the program is designed to have **employers deliver** the **payments directly to PSWs**, the amount received by PSWs is included in their **employment income** (Subsection 5(1)). The employer is required to **withhold income tax, CPP contributions** and **EI premiums** and report such amounts on the employee's **T4** slip.

In contrast, where the program is designed to deliver the **payments directly to PSWs**, the amount received by PSWs is included in their **income** as **financial assistance** (Subparagraph 56(1)(r)(i)). The province is required to **withhold income tax** and report the gross payments and withholdings on a **T4A** slip for each recipient.

CRA opined that the **specific program** by the **Government of Ontario** to **attract PSWs** to work in **long-term care homes** and **home and community care organizations** was structured such that the funding is provided to the employer, who then **delivers payments directly to PSWs**. As such, the payments are subject to withholdings and should be reported on a T4 slip.

4 Employment Income

539(4)

EMPLOYMENT INSURANCE – LATE APPLICATION

A May 12, 2026 **Federal Court of Appeal** case ([Musani vs. AGC, A-182-25](#)) reviewed an application for judicial review of the EI Commission's **refusal** to **antedate** the taxpayer's **application** for **maternity benefits** because she had **applied** for EI benefits past the period for which benefits could be obtained. The taxpayer was **working outside Canada** as a diplomat and only applied **16 months after** the **birth** of her child.

the importance of timely application for EI benefits

Taxpayer loses

The EI Commission **decision acknowledged** that the taxpayer experienced a **difficult pregnancy, birth and postpartum period** and that her **absence from Canada** added **challenges** to **accessing information** on the EI program. It was unfortunate that this also resulted in the loss of both EI benefits and top-up benefits from her employer, which required application for EI benefits. The EI commission's **conclusion** that these challenges "were **not so severe** as to **absolve** her of her **basic duties** to make inquiries" was **not unreasonable**. The application was therefore dismissed.

5 Business/Property Income

539(5)

FEES PAID TO INVESTMENT COUNSEL – COMMISSIONS

In a May 20, 2026 French **Court of Quebec** case ([Maurice vs. QRA, 2026 QCCQ 2205](#)), the taxpayer **deducted fees** annually ranging from \$107,000 to \$130,000 from 2018 to 2022 **paid to corporations providing specialized flow-through share tax-planning services**. The fees generally ranged from 8% to 11% of the flow-through share purchases. Only the deductibility of the related fees was challenged, not the taxpayers' flow-through share tax benefits themselves.

Revenu Québec (RQ) argued that the **fees paid** were **commissions** and therefore were specifically **precluded** from deduction (Quebec Taxation Act Section 157, which parallels the federal Income Tax Act Paragraph 20(1)(b)). RQ also argued that the fees paid were **not for consulting or management services**.

no immediate deduction for commissions

Taxpayer loses

To deduct investment counselling fees, all of the following conditions must be met:

- the amounts paid were **not commissions**;
- the amounts were **paid** for either:
 - **advice** on the advisability of **buying or selling certain shares**, or
 - services for the administration or management of the taxpayer's shares; and
- the amounts were paid to a person whose **principal business** activity was either:
 - advising others on the advisability of **buying or selling certain shares**, or
 - included the provision of services in the administration or management of shares.

The Court stated that the term **commission** is **not defined** in the Income Tax Act nor in the Quebec Taxation Act and therefore relied on **case law** to determine its meaning. After reviewing the jurisprudence, the court held that a fee **calculated** as a **percentage of a transaction** is a **strong indicator** that the payment is a commission. In observing the 8% to 11% fee and the fact that the firms earned compensation only upon a transaction, the court concluded the fees were **commissions** and therefore were **not deductible**.

In addition, the court found that the **services provided extended well beyond the limited activities** that allow for a deduction; they were for designing and implementing an entire tax strategy, not simply for advising on buying or selling shares.

*tax planning facilitators
and not investment
advisors*

The court noted that this provision is an **exception** to the **general rule** that **capital expenditures** are **not deductible** and therefore should be **interpreted narrowly**.

The court left open the **possibility** that **some portion** of the fees could **potentially qualify** for a deduction if the fees were not commissions and the invoices separately identified reasonable amounts for qualifying investment advice or security administration services.

The court finally noted (without deciding the issue) that the **fees may not** have been **incurred** for the purpose of earning income because the transactions were **undertaken** primarily to **obtain tax benefits** rather than **investment returns**.

*whether the fees were
incurred to obtain tax
benefits or investment
returns*

SPECIFIED LEASING PROPERTY

The **specified leasing property** rules (Regulations Subsections 1100(1.1) to (1.3)) can restrict a lessor's CCA claim so that they receive **no greater tax benefit** from **leasing equipment** than they would from providing financing to the lessee. Without this restriction, the lessor could include lease revenue in income while claiming CCA on the equipment, potentially generating losses. Specified leased property is **depreciable property, other than exempt property**, that meets all of the following conditions:

- it is used **principally to earn rent or leasing revenue**;
- it is **leased** to an **arm's length person** under a lease for a term of **more than one year**; and
- the leased tangible property has an aggregate **fair market value exceeding \$25,000** at the time the lease is entered into.

CCA limits on rental assets go beyond real estate

There are **many types** of **exempt property** that would not be subject to these rules, including **residential-use furniture**, appliances, television receivers, radio receivers, telephones, furnaces, hot-water heaters and **other similar properties** (Regulations Subparagraph 1100(1.13)(a)(ii)).

A February 4, 2026 French **Technical Interpretation** ([2025-1083931E5](#), Éric Paquin) opined that "other similar properties" in this context include **residential-use heat pumps** (wall-mounted and central), **air conditioners** (wall-mounted and central), **furnaces, boilers** and **equipment and accessories** (such as electric baseboard heaters and convectors, water heaters, humidifiers, generators, electrical panels and entrances). As such, these assets could be exempt property and not subject to the limitations of the specified leasing property rules.

broad interpretation of certain residential-use property

6 Capital Gains/Losses

539(6)

CAPITAL TO INVENTORY CONVERSION – TIMING

A May 29, 2026 **Tax Court of Canada** case ([Wilson 555 Avenue Inc. vs. HMK, 2021-1383\(IT\)G](#)) reviewed whether two **real estate** properties were held on **account of income or capital**, and if there was a **change in how** they were **held prior** to their **sale** in 2017 that resulted in gains of \$13.25 million.

The properties were originally acquired in 1996 and 1998 and were used for many years as **income-producing commercial rental** properties. While **discussions to convert** the properties to residential **condominiums** for sale began in **2005** and 2006, the first development agreement was not signed until 2008, rezoning was approved in 2010 with **financing** approved in **2011** and demolition and construction began in 2012. In **2008**, the **properties** were

rolled into a new corporation (Subsection 85(1)) that **sold them in 2017**.

The **taxpayer** argued that the properties were **acquired and held as capital assets**, resulting in \$13.25 million of capital gains. The taxpayer paid a **\$6.45 million capital dividend** based on the expected capital dividend account balance. The **taxpayer** argued that **development planning** activities did **not**, by themselves, **change the character** of the **properties** from capital to inventory.

CRA argued that **all gains** on both properties were **business income**. As a result, the **entire \$6.45 million capital dividend** was **excessive** and subject to Part III tax. **CRA** relied on the **2008 rollover date** as the relevant **acquisition date** for **determining the taxpayer's intention** (income or capital) rather than the 1996/1998 acquisition dates by the ultimate ownership group.

how rapidly to pay capital dividends

Taxpayer wins, mostly

The **court disagreed** with **CRA's approach** in determining that the gains were business income.

The court found that the **original intention** was to hold the properties on account of **capital**, based on the **ultimate ownership group's intention** when they acquired the properties in 1996/1998, **rather than** on the **specific taxpayer's intention** on the date when it **acquired** the property (the rollover date in this case), as asserted by **CRA**. The question was then whether, and if so, when, the properties were **converted from capital property to inventory**.

The court **accepted the taxpayer's testimony** that, although they were **exploring the possible conversion** of the commercial rental properties to residential condos for resale, including entering into development agreements beginning in 2008 and obtaining rezoning approval in 2010, they had **not decided** whether they would **proceed** with that project, even if it was possible. The court accepted that these steps were **exploratory** and **preparatory** in nature and that the **taxpayer retained the ability to abandon the project** and continue holding the properties as capital property.

exploring development opportunities was not the same as deciding to develop

The **court** found that the properties were **converted from capital property to inventory** on September 16, **2011** when financing was secured, as this was the point that the taxpayer became **irrevocably committed to the condominium project** based on the terms of the development agreements. This was the point in time that the **taxpayer's unilateral right to terminate the development project ceased**.

at what point the taxpayer became irrevocably committed

The court noted that the parties had agreed that this **conclusion** would also **resolve their disputes** regarding related issues including the portion of the **capital dividend** that would be **excessive**, eligibility for the **small business deduction** and entitlement to a **dividend refund**.

other impacts of an income vs. capital dispute

The court also noted that **CRA did not contest** the 2008 **rollover** (under Subsection 85(1)). Since a valid **rollover requires** that **real property be capital property** at the time of the rollover, real estate inventory is not eligible property. The court viewed this as inconsistent with CRA's own argument that the properties were inventory at the time.

the risk of an invalid rollover of real estate if it is found to be inventory

The court did **not rule** on **how or if** the **\$13.25 million gain** should be divided between capital gains and business income, **nor** did it **comment** on the **fair market value** of the **properties** on the date that they were converted from capital property to inventory. **CRA's previous administrative comments** indicate that the gain on the sale of property should be reported entirely in the year the property is disposed of and apportioned between income and capital gains based on the value when the nature of the property changed if the property was converted from capital to inventory (see VTN [526\(8231\)](#) and [477\(5905\)](#)).

The court also did **not rule** on **whether** there would be a **deemed disposition** at the time that the property was converted from income to capital (Subsections 13(7) and 45(1)), contrary to CRA's administrative position.

INCOME VS. CAPITAL – REAL ESTATE

A January 29, 2026 French **Court of Quebec** case ([Vullapah et al. vs. QRA, 2026 QCCQ 1478](#)) considered whether the **profit** realized on the 2012 disposition of **four buildings** was on account of **income or capital**. The taxpayers **acquired** the buildings in 2008.

The taxpayers argued that the **buildings** were **acquired** as a **long-term capital investment**. However, **significant challenges** arose shortly **after** the **acquisition**. **Extensive repairs** were required, **vacancy rates** were very **high** and there was a poor quality of tenants, including some who were engaged in **criminal activity**. The tenant list also appeared to have been falsified. In addition, the **individual originally expected to manage the properties**, who was also one of the **owners**, quickly realized that he **lacked the necessary experience** and was **unable to do so**.

Although an acquaintance temporarily assisted, the taxpayers ultimately sought a **permanent solution**. Only **one individual** was willing to assume management responsibility, but **only** on the condition that he receive an **option to purchase** the buildings. As such, the taxpayers' solution was to enter into a triple-net lease with that property manager and grant them an option to purchase the buildings. This **arrangement** was implemented **within six months** of the taxpayers' original **acquisition** of the properties. The taxpayers argued that the purchase option was **negotiated** as a **practical response** to operational difficulties and did **not** reflect an **original intention to resell the properties**.

evidence that the original intention of acquiring a long-term investment was frustrated

In reassessing the taxpayers on the basis that the **gain** was **business income**, **Revenu Québec** (RQ) argued that the taxpayers intended, from the outset, to quickly **resell the buildings at a profit**. RQ emphasized that the **purchase option** was granted to the new manager only six months after the acquisition of the buildings. In addition, several taxpayers had **real estate experience** and the **lease terms resembled a sale arrangement**. For example, there was a non-refundable \$450,000 security deposit if the option was not exercised within 47 months, additional non-refundable monthly payments of \$8,900 were required to maintain the option and the manager was responsible for all operating costs, including insurance, property taxes, management fees, mortgage payments, maintenance and repairs. RQ also noted that the **manager** assumed substantial **operational risk**, completed significant renovations and that the arrangement allegedly facilitated financing for a future purchaser.

Taxpayer wins

The **court** found that the transaction was **not** of a **commercial nature** and the resulting gain was on account of **capital**, as the taxpayers' intention was to acquire a long-term capital investment.

The court noted that it was **clear** that the **buildings** and **rental operation** were in a **poor state**. The manager was **credible** in explaining that, while the lease provided a **purchase option**, it did **not guarantee the sale** of the **buildings**, especially given the significant effort required to rehabilitate the buildings. For example, the 50% vacancy rate would need to be reduced, significant renovations would need to be undertaken, the surrounding environment and cashflow would need to be improved and the value of the building would need to be increased to allow a banker to finance the individual to exercise the purchase option.

whether a purchase option indicates an initial intention to resell the property

Within this **context**, the court found it **understandable** for the taxpayers to **engage a third party** to manage the property **without overriding** the taxpayers' **original intention**.

7 Partnerships

539(7)

LOSSES – MANDATORY OR DISCRETIONARY

A March 20, 2026 **Technical Interpretation** ([2025-106152117](#), Steve Pannozzi) discussed whether a **partnership loss** was **required** to be **deducted** by the partner. CRA indicated that a taxpayer has **discretion** to **claim** an expense or a **loss** only where this is **explicitly provided** in the legislation, citing the example of **losses carried back or forward** (Subsection 111(1)). **No similar discretion** is provided in respect of a **partner's share** of a current-year **partnership loss**. Therefore, the **taxpayer cannot choose** whether to claim such a loss.

whether the legislation provides discretion to make a claim

8 Owner-Manager Remuneration

539(8)

GROSS NEGLIGENCE PENALTIES – SHAREHOLDERS AND THEIR CORPORATION

A May 14, 2026 **Tax Court of Canada** case ([Malek et al. vs. HMK, 2022-69\(IT\)G](#)) considered a **net worth assessment** on two shareholders of a trucking corporation. CRA assessed the **individual shareholders** with **unreported income** for 2014, 2015 and 2016, and assessed the **corporation** with **unreported income** in 2015 and 2016 on the basis that the shareholders' unreported income came from the corporation. CRA also assessed the **shareholders** and the **corporation** with **gross negligence penalties** (Subsection 163(2)).

Taxpayers largely lose

The court largely **upheld** the **personal** and **corporate assessments** of **unreported income**, subject to a few small adjustments conceded by CRA before trial.

The court also **upheld** the **gross negligence penalties** assessed on the **shareholders** on the basis that they had **substantial** and **repeated omissions** from income over several years and the discrepancies were so **significant** that they amounted to gross negligence. The **income reported** over the three-year period from 2014 to 2016 represented only **23.7%** of the assessed amount for one shareholder (\$55,169 reported, \$232,555 assessed) and only **37.9%** of the assessed amount for the other shareholder (\$108,141 reported, \$285,561 assessed).

However, the court **vacated** the **corporation's gross negligence penalties** as **CRA failed to prove** that the corporation made **false statements** in its returns and acted with **gross negligence**. CRA had **not adequately analyzed** the **corporation's books and records** to establish false statements or omissions. Instead, the corporation's reassessments and penalties were based largely on the shareholders' net worth assessments. The court also noted that the corporation had retained **professional accountants**. Although the gross negligence penalties were reversed, the **additional income** reflecting the **shareholder's unreported income** remained **taxable** to the corporation and was therefore **fully taxable** both **personally** and **corporately**.

gross negligence penalty analyzed separately for shareholders and their corporation

SHAREHOLDER BENEFITS – CORPORATION'S OFF-RECORD PAYMENTS

In a March 17, 2026 French **Quebec Court of Appeal** case ([Estate of Mergl et al. vs. QRA, 2026 QCCA 358](#)), **shareholders** of a corporation were assessed with **shareholder benefits** outside of the normal reassessment period based on the assumption that **proceeds** the corporation received **from a false invoicing scheme** were **distributed** to the **shareholders**. The false invoicing scheme itself was not at issue in this case. **Neither cash** received **from the scheme nor the disbursements** from the corporation were **recorded** in the corporation's **books**.

The taxpayers argued that the **cash** from the scheme was used to **pay bribes and kickbacks** to local municipal representatives to **obtain public contracts** and that they did not receive the cash. Due to the nature of bribe and kickback payments, the taxpayers were **unable to prove the precise amounts** of such payments.

difficulties when corporate transactions are not recorded in their books

A Quebec public inquiry (the Charbonneau Commission) revealed a **system of corruption** in the awarding of **public contracts** by the municipality in which the **corporation participated**. While the taxpayers could not prove the precise amounts paid, the former mayor of the municipality acknowledged receiving payments but did not recall the exact amounts.

Taxpayers lose – statute-barred period

The court found that the **taxpayers** made **false representations** in their **personal tax returns** as they did **not report any income** from the corporation related to the proceeds from the corporation's false invoicing scheme. The court noted that, even if it accepted all of the taxpayers' explanations, there was still **no explanation** for **\$341,599** that the corporation received from the scheme and thus the shareholders were considered to have appropriated the amounts. **Failing to report** such an amount was sufficient to demonstrate a **misrepresentation**, allowing Revenu Québec (RQ) to assess the taxpayers **outside the normal reassessment period**. The court then reviewed the amount of the assessed shareholder benefits.

failure to report any benefit

Taxpayer wins, sort of – computation of shareholder benefit

The court found that, once the **shareholders demonstrated** that the **corporation paid bribes or kickbacks**, RQ **must estimate** the amount disbursed by the corporation in this regard, by an alternative method if necessary. Distributions of bribes must then be deducted from the shareholders' benefits assessed against the taxpayers. The court allowed the appeal, sending the file back to **RQ** to **prepare a reasonable estimate** of the amounts of **bribes** paid which would reduce the shareholder benefit. In taking this approach, the court ensured that the **bribes** to the public officials were **not deducted** (Section 67.5) by the corporation but only reduced the shareholder benefit.

The court also noted that **RQ's mandate** is limited to **collecting taxes that are actually owed** and that, when a taxpayer disputes an assessment, **RQ's goal should not be to "win"** the appeal by collecting as much tax as possible, but rather to collect the amount owed. Tax law should not be punitive, except for penalties. In this case, RQ knew that its assessments were causing taxpayers to pay taxes on amounts they did not personally benefit from.

9 Corporate Reorganization

539(9)

DISSENT PAYMENTS – DEEMED DIVIDENDS?

In a May 13, 2026 **Technical Interpretation** ([2026-1087881C6](#), Tania Ng), CRA considered whether a **payment** received by a shareholder exercising **dissent rights** under the relevant corporate law would be a **deemed dividend** (Subsection 84(2)). This provision applies on the **distribution** or appropriation of **funds** or property of a Canadian-resident corporation **in any manner whatever** to or for the **benefit** of its **shareholders** on the discontinuance, winding-up or reorganization of the business of the corporation.

whether the dissent payment would be a deemed dividend

CRA examined the topic in the context of the Federal Court of Appeal (FCA) decision in the Foix case (see VTN [500\(7001\)](#)), which opined on the **broad scope** of this **anti-avoidance provision** on the **discontinuance**, winding-up or reorganization of the business of the **corporation** (Subsection 84(2)). CRA noted that the FCA stated that the words "in any manner whatever" are "**far-reaching**" and "anchored in history as they have always been part of this provision, and they faithfully **reflect** its **anti-avoidance purpose**." The FCA also noted that a set of **structured transactions** must be viewed as a **whole** and confirmed that it is **possible** for this provision to **apply** even when a taxpayer is **no longer a shareholder** at the time funds or property are received.

potentially broad application of Subsection 84(2)

Typically, when a corporation resolves to **amalgamate**, shareholders who **exercise** their **dissent rights** are **entitled** to receive **fair value** for their **shares** under the applicable corporate law. Generally, a **payment** made to a **dissenting shareholder** would not be a negotiated amount, but rather, a **statutory remedy** available when the shareholder **disagrees** with **certain fundamental corporate changes**. Accordingly, CRA stated that they would **not generally** apply Subsection 84(2) in circumstances where an **amalgamation**, the **exercise** of the shareholders' **dissenting rights** and subsequent dissent **payments** are undertaken for **bona fide non-tax reasons**. However, given the **broad scope** of this anti-avoidance provision and the court's **warning against** an **overly formalistic and restrictive approach** that would be contrary to a textual, contextual and purposive

interpretation, CRA stated that they **could apply** Subsection 84(2) to a situation that includes the **exercise** of a shareholder's **dissent right** when a corporation resolves to amalgamate, depending on the facts of the particular situation.

10 CRA

539(10)

STATUTE-BARRED ISSUE – RELIANCE ON INTERNAL ACCOUNTANTS

An April 9, 2026 French **Tax Court of Canada** case ([3278735 Nova Scotia Limited vs. HMK, 2023-2329\(GST\)G](#)) reviewed whether CRA was entitled to **reassess** the taxpayer **beyond** the **normal reassessment period** and whether the taxpayer was subject to **gross negligence penalties**. The taxpayer's GST/HST return was upwardly adjusted to **increase GST/HST** by \$41,240 and to **reduce input tax credits** by \$141,320 (the computation of these adjustments was not at issue). CRA previously pursued, then abandoned, a criminal investigation of a related corporation.

The owner of the taxpayer testified that he **relied** on the **taxpayer's accounting department** to **file accurate returns**, but he did **not personally review them** or ensure that they were correct, despite some of his old corporations having **faced audit issues**. The court observed that the **owner** had a **strong understanding** of the **GST/HST** system and was a **competent businessperson** but was content leaving responsibility for tax obligations in the hands of his accounting staff.

Taxpayer losses – statute-barred issue

The court stated that **reliance on accountants** does **not protect** one from **negligence** or carelessness. **Filings** with the **errors** constituted a **misrepresentation** attributable to **neglect** and carelessness as the owner **failed to make reasonable efforts** to comply with the taxpayer's tax obligations.

delegating work to accounting staff without review is insufficient

Taxpayer wins – gross negligence penalty

The court further stated that there was **no evidence** to support a finding that the taxpayer **avoided the truth**. Rather, the evidence indicated that the **owner delegated tax matters** to his accounting staff. While the owner should have ensured that the filings were correct, there was **no evidence** that there were **"flashing red lights"** in respect of the reporting periods at issue. The court also found that there was **no evidence connecting CRA's abandoned criminal investigation** to the taxpayer's **false statements**. The court also expressed concerns about a computational error in the CRA-prepared chart demonstrating the calculation of penalties. The court **dismissed the gross negligence penalties**.

abandoned criminal investigation not relevant for assessing gross negligence penalties

TAXPAYER RELIEF ROUND-UP

The **taxpayer relief** measures allow **CRA discretion** to **waive penalties and interest** (Subsection 220(3.1) and Excise Tax Act Section 281.1), to accept **certain elections** being **filed or amended** after their **due dates** (Subsection 220(3.2)) and to **reassess statute-barred tax returns for individuals** and graduated rate estates to grant refunds (Subsection 152(4.2)). No **objection** or **appeal** can be filed in respect of **CRA's exercise of discretion**, but taxpayers can apply for **judicial review** of CRA's decisions (see VTN [530\(8410\)](#)).

Personal hardship

In an April 22, 2026 **Federal Court** case ([Talbot vs. AGC, T-2235-25](#)), the court considered whether CRA reasonably denied **additional taxpayer relief** from penalties and interest despite significant **personal hardship**.

The taxpayer argued that **serious health problems**, multiple motor **vehicle accidents**, the **breakdown of his marriage**, **cancer** and the alleged **theft of nearly \$1 million** by his bookkeeper **prevented** him from **complying with his tax obligations**. CRA had previously granted partial relief related to his 2015 cancer diagnosis and delays attributable to CRA processing.

The court found **CRA's decision reasonable** as many of the events relied upon by the taxpayer did **not prevent** him from **filing or remitting taxes**. For example, the court noted that during these periods he **continued operating** his construction business, managing financial affairs and engaging in transactions of comparable complexity.

whether the circumstances actually prevented filing and payment

The court also considered the **bookkeeper fraud**, **agreeing with CRA** that business owners **retain responsibility** for maintaining adequate books and records and supervising their financial affairs. CRA's conclusion that the taxpayer **failed to exercise sufficient diligence** was also reasonable.

Charitable donation shelter

An April 22, 2026 **Federal Court** case ([Lafleur vs. AGC, T-3540-24](#)) reviewed CRA's **denial of interest relief** in respect of a **charitable donation tax shelter**. The court noted that the audit of the shelter and the taxpayers' subsequent objection and appeal to the Tax Court took **many years**, during which interest accumulated. CRA had concluded that the taxpayers had been **repeatedly advised of ongoing interest accruals** so the **interest was within their control**.

The court noted that the Tax Court had **commented** that the taxpayers had a **donative intent** based on their **history** of other significant donations. CRA's decision did **not reflect consideration** of this nor of their **history of compliance**. Rather, CRA had relied on a **generalization of participants in the tax shelter** that **failed to consider the unique facts** of these specific taxpayers. In failing to consider these elements, their **decision was unreasonable** and granted judicial review, ordering a **new review** by CRA.

whether factors unique to the taxpayer were fully considered

Missing slips

A June 1, 2026 **Federal Court** case ([Huang vs. AGC, T-4867-25](#)) reviewed CRA's **denial of penalty and interest relief** in respect of **unreported income**. The taxpayer **failed to include** two **T5 slips** from her **2021** tax return because they were **received after filing**. She was **reassessed by CRA without penalty**. She then **failed to include T5 slips** in her **2022** tax return because they were **unavailable** through the **auto-fill service** and was reassessed with a penalty. **Both returns** were filed in **March**.

the risks of missing slips when filing early in the personal tax season

CRA **denied penalty relief**, noting that **CRA received** the **slips** before the end of **February** and **processed** them prior to the end of **April**, so they would have been **available** before the **filing deadline**. The **taxpayer did not** request an **adjustment** to add the **missing income** in the **six subsequent months** before CRA reassessed her return, despite **requesting other adjustments** during that period. The taxpayer also had an **obligation to estimate** the missing **income** based on her **statements** from her financial institution if the slips were not received prior to the filing deadline. The court noted that the **T5 slips** would have been **available** to the taxpayer through the **financial institution's portal** even if they were not available from CRA. In addition, the **taxpayer remains responsible** for ensuring that **all of their income is reported**. It was **reasonable to expect** that the **taxpayer** had **knowledge** of her sources of **income**. Based on all of these facts, **CRA's decision was reasonable**. **Judicial review** was therefore **denied**, and costs of \$250 were ordered against the taxpayer.

slips not being available from CRA is not a reason for income to be unreported

LATE OBJECTION – INCORRECT ADDRESS

A **notice of objection** is required to be filed within **90 days** of the **date of the applicable assessment** (Subsection 165(1) and Excise Tax Act Subsection 301(1.1)). The assessment is deemed to have been made on the date that it was sent (Subsection 244(15)). As such, many disputes focus on whether, in fact, the assessment was sent (either by mail or electronically; Subsection 244(14)) by CRA. Where this deadline is missed, a taxpayer can **apply for an extension** to file a notice of objection within **one year** of the original deadline to file it (Paragraph 166.2(5)(a) and Excise Tax Act Paragraph 303(7)(a)). Where **CRA refuses** to allow the extension, their decision can be **reviewed by the courts**.

An April 9, 2026 **Tax Court of Canada** case ([Shaker vs. HMK, 2023-512\(IT\)G](#)) considered whether **notices of reassessment** were validly mailed when sent to an incomplete address.

The following events occurred:

- **February 26, 2013** – Federal Court issued a compliance order **requiring** the taxpayer to **file** his 2008 and 2009 tax returns.

- **June 2013** – The **taxpayer filed** their 2008 and 2009 tax returns, which listed an **incomplete address** in London, UK (lacking a unit number and postal code).
- **June 2015** – CRA obtained the taxpayer's **passport application** from Immigration Canada (related to a review of the taxpayer's residency) which contained the taxpayer's **complete address**.
- **July 2015 to August 2016** – CRA sent a **proposal letter** (and other correspondence) to the complete second address and copied the authorized representative (a law firm assisting the taxpayer).
- **March 2017** – Citing delivery concerns, CRA faxed the taxpayer's representative **requesting an updated mailing address** before issuing the final audit letter. The representative was not able to contact the taxpayer so could not provide updated information. Notices of reassessment were **sent to the incomplete** first address.
- **July 2022** – The taxpayer **received** copies of the **reassessments** during legal proceedings and noted this was the first time he had received them. He filed notices of objection shortly after (within 2 months).

ensuring complete addresses are provided to CRA, especially if living outside of the country

keeping contact client information and address current, especially if client is moving

CRA argued that the notices of reassessment were **validly mailed** in **March 2017** as they had used the **last address** the **taxpayer** had **provided** to them. As such, CRA stated that the taxpayer had **missed** the June 2018 **deadline** to request an extended period in which to object.

Taxpayer wins

The court referenced previous cases that set the **test** for determining whether assessments were validly sent as the following:

1. Was the notice mailed to the wrong address through no **fault** of the **taxpayer**?
2. Was it mailed to the **address "properly on file"**?

what address CRA had on file

The court acknowledged that, although the taxpayer had been uncooperative during the audit (not responding to certain CRA requests), it held that this conduct did **not amount to fault** regarding the **mailing address**. CRA had independently obtained the complete address from a passport application and **consistently used that address** for audit correspondence. There was no indication that CRA still considered his mailing address incomplete.

While taxpayers generally bear responsibility for maintaining current addresses with CRA, this case differed in that **CRA** had **knowingly switched** to using the **more complete** and deliverable **address** for prior communications, yet **reverted** to the **incomplete address** when issuing reassessments. Both parties had effectively treated the complete address as the operative address; therefore, the March 2017 assessments were not mailed to the address properly on file. As they were not validly sent, the **objection could proceed**.

ensuring CRA has complete addresses to avoid these issues

LATE OBJECTION – GST/HST

A **notice of objection** in respect of **GST/HST** is required to be filed within **90 days** of the **date of the applicable assessment** (Excise Tax Act Subsection 301(1.1)). The assessment is deemed to have been made on the date that it was sent (Excise Tax Act Subsection 335(11)). As such, many disputes focus on whether, in fact, the assessment was sent by CRA in the manner required. Where this deadline is missed, a taxpayer can **apply for an extension** to file a notice of objection within **one year** of the original deadline to file it (Excise Tax Act Paragraph 303(7)(a)). A **CRA decision** to refuse to allow the extension can be **reviewed by the courts** (Excise Tax Act Subsection 304(1)).

A May 22, 2026 **Tax Court of Canada** case ([Web Listings Inc. vs. HMK, 2024-423\(GST\)APP](#)) reviewed these requirements in detail. The **timelines** can be summarized as follows:

- a. **notices of assessment** were issued in May and July **2021** for various reporting periods;
- b. the taxpayer filed a **notice of objection** on **July 24, 2023**;
- c. CRA **rejected** the objection as it was **past the 90-day deadline** in a **decision letter** dated **September 13, 2023**;
- d. CRA also stated in their decision letter that **no extension of time** could be granted as the objection was filed **more than one year** after the **expiration** of the 90-day **objection period**; and
- e. the **taxpayer applied** for a court review on **January 22, 2024**.

Timing of application for court review

The court first addressed whether the **application** could be **reviewed** at all, which requires that the following **three conditions** be met:

- the taxpayer **applied** for an **extension of time to object**;
- that **application** was **refused**, or the taxpayer was **not notified** of a decision more than **90 days** after applying for the extension; and
- the taxpayer **applied to the court** within **30 days** after the date on which notification of the **decision** was **mailed**.

these requirements for a court review of refusal to extend time to object

Although the **application** was filed **more than 30 days** after the **decision letter** was mailed, the court noted that the legislation (Excise Tax Act Subsection 303(5)) requires that CRA **notify the taxpayer** of their decision by **registered or certified mail**. As the decision letter was sent by **regular mail**, the **30-day deadline** did **not apply**.

decisions on extension of time for GST/HST objections must be sent by registered mail

The court noted that **CRA could provide evidence** that notification by a method **other than registered mail** was **received by the taxpayer**. However, in this case, the notification sent by **regular mail** was **returned to CRA**, and there was **no evidence** that a copy sent to the **taxpayer's representative** had been **provided** to the taxpayer. As a result, the **30-day**

deadline never commenced.

Application to income tax objections

The court noted that the provisions for **extension of time to object to income tax** assessments (Subsections 165(3) and 166.1(5)) had **no requirement** that the **decision** be sent by **registered mail** as this requirement was removed many years ago.

replies in respect of income tax objections need not be sent by registered mail

Application for late objection

CRA argued that the taxpayer had **only** filed an **objection** and did **not apply** for an **extension** of time to object. The court held that, as CRA may **accept applications** that do **not conform** to the **legislative requirements**, their practice of **pre-emptively considering** whether an **extension** was available and **including** their **decision** in their response indicated that they **accepted** that the notice of objection was also an **application for extension** of time to object. The court noted that this resulted in CRA failing to inform the taxpayer about the 30-day deadline to apply for a court's review of the decision.

ensuring that objections filed late explicitly request an extension of time to object to avoid reliance on CRA applying this approach

The **taxpayer** was therefore **considered** to have **requested an extension** of time **because CRA** had **treated the objection as if** an **extension** had been **requested**.

Notice of assessment

The taxpayer **argued** that he had **never received** the notices of **assessment**. However, the evidence showed that the **taxpayer** had **registered his business** for **electronic notifications** using his **accountant's email address**. CRA provided evidence that the **assessments were posted** to the taxpayer's online account and were **accessed by the accountant**. Because the **accountant did not testify**, the court drew an **adverse inference** that the accountant **received the notifications** at the **email address authorized** by the taxpayer.

careful consideration of the implications of agreeing to be the client's CRA email contact

It was **possible** that the **accountant ignored** the notifications; however, this would **not impact CRA's position**. The **notices** of assessment were therefore **sent** on the **dates asserted by CRA** and the **objection and extension request** were filed **too late** to be accepted.

The court noted that, since the facts of this case, the legislation had been amended to **broaden** CRA's use of **electronic communication** on **business accounts** (see VTN 526(8238)). The court expressed **concern** that this created an **increased risk** that **important communications** would go **unnoticed**. The court further noted that **only Parliament** can **amend** the manner in which **CRA may communicate** and only Parliament can **extend the deadlines** for objecting to assessments.

courts are bound by the legislation related to electronic communications, despite concerns that deadlines will more easily be missed

Additional case – deadlines binding

In a second May 22, 2026 **Tax Court of Canada** case ([Xu vs. HMK, 2025-2156\(GST\)APP](#)), the court **dismissed** an application for review of a similar **denial** of an **extension of time to object** because the **taxpayer** did **not file** an application for review **within the 30-day period**. The court noted concerns that **neither** the **decision letter** nor the **CRA webpage** referred to therein ([objections, appeals, disputes, and relief measures](#)) mentioned that deadline. However, the **court** was **bound** by the legislated **time limits** regardless of how little information CRA provided to the taxpayer.

lack of timely filings can eliminate appeal rights

ADDITIONAL ASSESSMENT VERSUS REASSESSMENT

In an April 14, 2026 French **Tax Court of Canada** case ([Toutain vs. HMK, 2025-1697\(IT\)APP](#)), the court considered whether a **taxpayer** could **appeal a penalty reassessment** after a **later reassessment** for the **same taxation year** had been issued. The history of events included the following:

- April 6, 2023 – CRA issued the **original assessment** for the 2022 taxation year.
- July 11, 2024 – CRA issued a **second assessment**, adding a **late-filing penalty** and interest related to **Form T1135, Foreign Income Verification Statement**. The taxpayer filed an objection to this assessment.
- February 10, 2025 – CRA confirmed the second assessment.
- March 17, 2025 – CRA issued a **third assessment, adding foreign dividend income** but not **referencing the T1135 penalty**. The taxpayer filed an objection to the third assessment, which CRA confirmed.
- August 14, 2025 – Taxpayer filed documents to obtain an **extension to appeal the second assessment**, as well as to appeal the third assessment.

The parties then **filed a consent to judgment** that would **allow** the taxpayer an **extension of time to appeal the second assessment** while **waiving appeal rights** regarding the **third assessment**. The **court agreed** with the consent to judgment.

The court noted that **not every later assessment** automatically **replaces all earlier assessments**. Rather, the **facts of the situation** must be examined to determine whether the later assessment **entirely supersedes** the earlier one, constituting a reassessment **or** merely **adds another adjustment**. In this situation, the court found that the **second assessment** was an **additional assessment** rather than a reassessment because it only added the T1135 penalty without altering the taxpayer's income tax calculations. The **third assessment** only **added the foreign dividend income** and did not eliminate or replace the second assessment. Rather, it modified (and therefore replaced) the first assessment without modifying (or replacing) the second assessment. As such, the second assessment, which included the

whether a subsequent assessment replaces, or is an addition to, an earlier assessment

T1135 penalty, coexisted with the third assessment in respect of the additional tax on the dividends.

See VTN [415\(2498\)](#) for a discussion of a similar case that influenced this decision.

11 Estate Planning

539(11)

TRUST TO TRUST TRANSFERS – 21-YEAR PLANNING

In a 2025 French **Advance Tax Ruling** ([2024-1036051R3](#)), CRA ruled that a **discretionary family trust** (Trust1) that would **transfer all** of its **assets to a newly created trust** (Trust2) for no consideration would **not trigger** a **disposition** (Paragraph (f) of the definition of disposition in Subsection 248(1)). **Trust2** would have the **same trustees, beneficiaries and nearly identical terms** as Trust1, **except** that the trustees of **Trust2** would have the **discretion** to make an **irrevocable allocation** of the interests to one or more of the beneficiaries of Trust2. CRA ruled that Trust2 would be deemed to be the same trust and a **continuation** of Trust1, and therefore, the **original 21-year clock** of Trust1 would continue and **not reset** in Trust2 (Subsection 248(25.1)). In other words, the 21-year deemed disposition in Trust2 would occur on the 21st anniversary of the settlement of Trust1. Before the 21st anniversary, the trustees of Trust2 would cause **all income and capital interests to vest indefeasibly** in one **beneficiary**, so that Trust2 would not be subject to the 21-year deemed disposition rule (Subsection 104(4)).

reorganization to avoid the 21-year deemed disposition rule

CRA also ruled that there would be **no loss restriction event** with respect to **three private corporations** whose **ownership changed** as a result of the transaction, as **legal control** of the corporations **remained** with the **same trustees**. CRA further ruled that **GAAR** would **not apply**.

ensuring legal control does not change

See VTN [449\(4421\)](#) for CRA comments on what constitutes vesting indefeasibly, as this is not defined in the Income Tax Act.

TAXPAYER RELIEF – ONLINE MAIL

A May 11, 2026 French **Federal Court** case ([Haddad vs. AGC, T-3376-24](#)) reviewed the taxpayer's application for **judicial review** of CRA's **denial of a waiver of penalty taxes** on his **excess TFSA contributions** for the 2020, 2021 and 2022 taxation years (1%/month during which the excess contributions remained in the TFSA; Section 207.02) as CRA found that the excess contribution did **not** result from a **reasonable error**.

The taxpayer made **automatic monthly transfers** to his **TFSA** starting in 2015 and **regularly verified** with his bank that he did **not exceed** the contribution **limit**. In **2020**, CRA sent the taxpayer an **email notification** informing him that he had a message in his **My Account**. It was **unclear how or when** the **taxpayer signed up** for **online mail**. However, because the **taxpayer** was **locked out** of his **account** and unable to unblock it after several attempts due to CRA phone wait times and his work schedule during the COVID-19 pandemic, he was **unaware** of the **excess contribution** for **several years**. The taxpayer's **tax returns** continued to be prepared and **filed** by his **accountant**, who did **not mention any issues** related to the taxpayer's **TFSA**. The taxpayer also continued to receive his **annual tax refunds**. CRA posted **notices of assessments** indicating the amount of **tax** on the **excess contributions** to My Account with **email notification**. In May **2024**, the taxpayer **contacted CRA** regarding withdrawing the TFSA funds to purchase a home and was **informed** of the **excess contributions**. As soon as he was informed, he **withdrew the excess contributions**.

risk of excess contributions for several years, even with the help of an accountant

Taxpayer wins

The court stated that **case law** clearly **demonstrates** that acting in **good faith, not being aware** of the TFSA **rules** or having **received bad advice** do **not** cause **reasonable errors**. On the contrary, **reasonable errors** can be caused by **banking errors, physical disasters, civil unrest, serious illness** or accident or **distress**.

Consistent with well-established case law, the court **rejected** the taxpayer's **argument** that a **third-party error**, including the accountant's mistake or failure, constituted a valid ground for judicial review. The court noted that it was possible to bring an **action against this third party**, but **not** to obtain a **remedy** against **CRA**.

risk of claim against the accountant

The taxpayer also **argued** that he believed the **online messages** were **unimportant** as he had always received important letters from CRA through other means and had **never authorized CRA** to send notifications **only through My Account**. The court found that **CRA's decision** not to provide relief did **not analyze** whether **this argument** indicated a reasonable error. As such, CRA's decision was **unreasonable** and the file was referred to another agent for reconsideration.

TFSA AND RRIF DESIGNATIONS – ESTATE MATTERS

A March 26, 2026 **Ontario Superior Court of Justice** case ([Kunka Estate vs. Giasson, 2026 ONSC 1842](#)) reviewed **whether beneficiary designations** of a **deceased's RRSP and TFSA** should stand or whether the assets should **revert** to the **deceased's estate**.

The deceased (K) was in a **common-law relationship** with **M** for over thirty years. K received **M's TFSA and RRIF** as her designated beneficiary upon **M's death**. K then named **M's children** as **beneficiaries of his will**. However, shortly after M's passing, **K** rekindled a relationship with a friend (G), resulting in **K naming G** as the **designated beneficiary** of his TFSA and RRIF.

complexities with blended families

Relying on the Supreme Court decision in Pecore (see VTN [312\(8762\)](#)), the **trustee** (one of M's children and a beneficiary) argued that a presumption of a resulting trust would apply to the TFSA and the RRIF, thereby causing **both the TFSA and RRIF to revert to the estate**. This would mean the onus would be shifted to G to establish that K intended to gift the TFSA and RRIF to her on his death.

The court **rejected** the **trustee's argument**, stating that **Pecore** dealt with an individual adding their daughter as a **joint account holder** on a **bank account** (providing immediate access to the funds during his lifetime). In contrast, this case deals with a **TFSA and RRIF beneficiary designation** that **operates entirely differently**, as the designated person has neither interest in nor access to the account until the holder dies. As such, the court found that there was no resulting trust, and that the trustee did not prove that K intended for the TFSA and RRSP to form part of the estate.

The court further stated that the **fact** that the **funds came from M's estate** and thus **morally** should have **passed to her children** had **no basis in law**. Once K inherited the assets, they became his and he chose to re-designate them to G.

The court's reasoning was based on an analysis of [Ontario's Succession Law Reform Act](#).

An April 2026 Sorbara Law article ([Kunka Estate V Giasson: Ending the uncertainty on beneficiary designations](#), Apeksha Jain) further discussed this case, noting the following four lessons:

- an **individual's designation is their decision** and the courts will generally honour it even if family members are unhappy with the outcome;
- an individual's **will** does **not automatically** govern their **registered accounts: TFSAs and RRIFs** are separate instruments, and **beneficiary designations** must be **reviewed** and **updated independently** to ensure there are no conflicting instructions;
- **major life events** such as separation, divorce, a new relationship or the death of a spouse should prompt an individual to **review their beneficiary designations** to confirm they still reflect their wishes; and
- if an individual **intends** for funds from a **registered account to flow** through their **estate**, they must **expressly designate the estate** as beneficiary, since the default is for the named individual to receive the proceeds directly.

reviewing beneficiary designations

12 Charities/NPOs

539(12)

TAX SHELTER – ABUSE OF PROCESS

A March 19, 2026 **Tax Court of Canada** case ([Kelly et al. vs. HMK, 2021-3156\(IT\)G](#)) considered whether **eleven taxpayers' appeals** relating to a **tax shelter donation scheme** (Global Learning and Gifting Initiative; GLGI) should be struck as an **abuse of process**.

The court did not **strike** the appeals but rather indicated that it was **strongly leaning** that way but was giving one final opportunity for the parties to make written submissions. The **court highlighted** that the program has been **exhaustively litigated** (approximately 1,500 cases) where it was consistently determined that participants **lacked donative intent** due to the scheme's structure. The court noted that the appellants in this group presented **no new facts**, legal **arguments**, or distinguishing **features**, making their appeals effectively duplicative and contrary to the integrity of the judicial system.

similar cases may not be eligible for judicial consideration

Although donative intent is typically subjective, the court reaffirmed that, in the GLGI context, **the scheme's design** (where participants expected benefits exceeding their contributions) legally **precluded such donative intent**. This removed any individualized basis for relitigation. The court also underscored **systemic concerns**: repeated litigation **wastes judicial resources**, risks **inconsistent outcomes** and **undermines public confidence** in the courts.

In late May and June 2026, the **Tax Court of Canada** released several rulings addressing this matter. The court stated that **one taxpayer withdrew** their **appeal** and **another taxpayer conceded** the **GLGI portion** of their appeal but was allowed to file an amended notice of appeal in respect of other adjustments they argued should be made for the related tax years. A **third taxpayer provided no written submissions**, so their **appeal was struck**.

The court **struck** the **appeals** of the remaining **eight taxpayers** (see, for example, [Hassall vs. HMK, 2022-1109\(IT\)G](#)) for the reasons noted above, with costs being awarded against the taxpayer in most cases. One of those taxpayers had **included other issues** in his notice of appeal, and those other issues were **bifurcated** (Subsection 171(2)) with the **non-GLGI component** proceeding separately.

the likelihood of similar appeals also being struck

13 International

539(13)

CAPITAL DISTRIBUTIONS TO NON-RESIDENT BENEFICIARIES

In a recently released June 12, 2023 **Technical Interpretation** ([2022-0956461E5](#), Ann Kippen), CRA confirmed that **capital distributions** from an **estate or trust** are **deemed** to be **income** to the **beneficiary**. However, **Part XIII withholding tax** (25% subject to treaty reduction; Subsection 212(2)) is required **only** in respect of **income** of the **estate or trust** that is **distributed** to a **non-resident beneficiary**, so **no withholding tax** applies on **capital distributions**.

no withholding tax on capital distributions from an estate or trust

CRA also discussed the **process** for **recovering** any Part XIII **tax withheld in error** (see VTN [513\(7644\)](#)) and the **requirement** to **report** the **capital distributions** on **NR4 Statement of Amounts Paid or Credited to Non-Residents of Canada slips annually** (see VTN [432\(3631\)](#)).

disclosure requirements even if there is not Part XIII tax on capital distributions

Editors' comment

CRA did not discuss the possibility of disclosure and remittance requirements in respect of taxable Canadian property (Section 116; see VTN [533\(8556\)](#)).

NON-RESIDENT'S SHARES REDEEMED – WITHHOLDING ISSUES

A May 13, 2026 **Technical Interpretation** ([2026-1087931C6](#), Vicky Liu) discussed two separate tax consequences that may arise when **shares held by a non-resident** that are **taxable Canadian property** (defined in Subsection 248(1)) and not excluded property (Subsection 116(6)) are **redeemed** by a **corporation** resident in Canada.

Upon **redemption** of the shares, a **dividend** would be **deemed** to have been paid to the extent that the redemption proceeds exceeded the paid-up capital of the shares (Subsection 84(3)). The **deemed dividend** would be subject to **Part XIII tax** (25% subject to treaty reduction; Subsection 212(2)). At the same time, if **no certificate of compliance** was issued, the **purchaser** (redeeming corporation) would be required to **remit 25%** of the redemption proceeds (Subsection 116(5)).

CRA confirmed that **concurrent remittance obligations** may arise on the **deemed dividend** where a **certificate of compliance** requested is **not issued** before the purchaser's remittance deadline (30 days after the end of the month in which the shares are redeemed; Subsection 116(5)).

potential multiple withholding requirements in respect of a single redemption

CRA may, upon request, **confirm** in writing that they will **not apply penalties and interest** that would otherwise arise from a **failure to remit** under Subsection 116(5), **provided** that the **purchaser** (redeeming corporation) **holds** the amount required under that provision in a **fiduciary capacity until CRA** completes their review and **advises** of the **amount required** to be **remitted**. While this policy may be helpful to the purchaser (redeeming corporation), the vendor does not benefit as the withholdings are still held by the purchaser.

CRA acknowledged the burden created by delays in the issuance of Section 116 certificates and stated that they are working to improve processing times.

The Income Tax Act **prevents** the **same amount** from being **included** or deducted **more than once** in computing a taxpayer's income, taxable income, taxable income earned in Canada, or income or loss from a particular source or place for a taxation year (Paragraph 248(28)(a)). CRA opined that this provision does **not resolve** the **concurrent application of Part XIII tax** on the deemed dividend and **purchaser liability** under Subsection 116(5), because there is no double inclusion of the same amount in income, but rather a concurrent operation of a withholding and a remittance mechanism under Parts I and XIII of the Act. Any remittance under Subsection 116(5) should ultimately be recoverable by the non-resident vendor.

no legislative relief for cashflow issues

CRA stated that the **Department of Finance** is **aware** of the potential for concurrent remittance obligations and that **discussions** on this matter are **ongoing**.

SHARE EXCHANGE AND CERTIFICATE OF COMPLIANCE

In a May 13, 2026 **Technical Interpretation** ([2026-1091151C6](#), Grace Tu), CRA opined that a **share exchange** (Section 51) by a non-resident does **not** trigger a **Section 116 purchaser liability**.

A **share exchange operates to defer recognition** of a **capital gain** or loss on the **conversion** or **exchange** of a share, bond, debenture or note of a corporation (in that subsection referred to as a "convertible property") **into shares** of one or more classes of the capital stock of that corporation. The taxpayer who converts or exchanges convertible property may be a non-resident.

A **purchaser** must **withhold 25% tax** on the acquisition of any **taxable Canadian property from a non-resident person** if the non-resident does **not** obtain a **certificate of compliance**. CRA stated that these provisions do **not apply** where there is an **exchange of shares** that are taxable Canadian property, as such exchanges are generally deemed not to be a disposition of the convertible property (Paragraph 51(1)(c)), including for purposes of

no purchaser liability for Section 51 share exchange by non-resident

Section 116. This is consistent with CRA's previous comments in Technical Interpretations 9631575 and 2001-0070415.

That is, where an **exchange of shares** is **deemed not** to be a **disposition**, there is no person to whom the non-resident person disposed of the property; therefore, there is also **no purchaser** for these purposes.

In Paragraph 40 of [IC72-17R6 - Procedures Concerning the Disposition of Taxable Canadian Property by Non-Residents of Canada - Section 116](#), CRA stated that although Section 116 purchaser liability would not technically apply to a share exchange because there is no "disposition" of the property, this purchaser liability would still apply to an "acquisition" of the taxable Canadian property. CRA stated that their prior position on this matter, noted in IC72-17R6, would be amended.

DEEMED RESIDENT TRUST

Generally, a **non-resident trust** (NRT) will be **deemed** to be **resident in Canada** throughout any year in which the NRT has either (Section 94):

- a **resident contributor**, being a Canadian resident who has, at any time, contributed property to the NRT; or
- both a **resident beneficiary** and a **connected contributor**, being as follows:
 - a **resident beneficiary** is a **Canadian resident** who is a **beneficiary** of the NRT, **other** than a **successor beneficiary** (generally a beneficiary whose entitlement to income or capital of the NRT will only arise in the event of the death of one or more current beneficiaries); and
 - a **connected contributor** is any person who **made contributions** to the NRT and **was a resident of Canada** at any time **within 60 months before or after** making the contribution.

the complex and onerous rules for non-resident trusts with either a Canadian beneficiary or a Canadian contributor

In a March 24, 2026 **Technical Interpretation** ([2025-1061181E5](#), D. Dannehl), CRA opined that an **NRT** could **still be a deemed resident trust** if the **relevant contribution** was made to the trust in a year that **predated** the **effective date** of these rules (taxation years of trusts that end after 2006), provided that all other conditions were otherwise met.

tainting of trust due to contributions many years ago

Editors' comment

Even if a non-resident trust is not a deemed resident trust, there may still be disclosure and remittance requirements (see VTN [503\(7137\)](#)). For example, Form [T1141, Information Return in Respect of Contributions to Non-Resident Trusts, Arrangements, or Entities](#), is required to be completed for Canadian residents that are contributors, connected contributors or resident contributors of non-arm's length transfers or loans to non-resident trusts. Also, Form [T1142, Information Return in Respect of Distributions from and Indebtedness to a Non-Resident Trust](#), is required to be completed for

Canadian residents who receive distributions from, or are indebted to, non-resident trusts during the year.

14 GST/HST

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PURPOSE-BUILT RENTAL HOUSING (PBRH) REBATE – QUICK SALES

The **PBRH** rebate provides a **100% GST rebate** for **certain rental housing projects** that begin construction between September 14, 2023 and December 31, 2030 inclusive, and complete construction by December 31, 2035 (see VTN [534\(8594\)](#), [527\(8311\)](#) and [506\(7331\)](#)). One eligibility criterion is that the first use of the **residential unit** is, or can reasonably be expected to be, as the **primary place of residence** of an individual who will **occupy the unit continuously** for a **period of at least one year**.

A March 25, 2026 **Technical Interpretation** (248618, Denis Mazerolle) discussed whether the **PBRH rebate** must be **repaid** if the property was **sold within a year** of the individual commencing to live in the property.

There is a rule that can **require repayment** of a new residential rental rebate (which includes the PBRH rebate) where the property is **sold** within that first **one-year period**; however, the specific rule does **not apply** to sales of a unit in a **multiple unit residential complex** (Excise Tax Act Subsection 256.2(10)). As the PBRH rebate is **only available** in respect of units in a **multiple unit residential complex**, CRA opined that this **required repayment** does **not apply**.

sale within the first year of occupation would not require repayment of the rebate

GST/HST ROUND-UP

CRA provided some **recent interpretations on GST/HST** matters as follows:

- In a January 10, 2025 **Technical Interpretation** (246890, Kina Lynch), CRA reviewed a **membership arrangement** and charge which included a **mandatory component** for **insurance coverage** and other benefits. CRA opined that a **single supply** was being made and that the supply was **taxable membership services**.
- In a March 10, 2025 **Technical Interpretation** (222354, Frankie Fenton), CRA considered an **agent** acting for a third party to **facilitate equipment financing arrangements** (loans and leases), invoicing the lessor or lender for their services. For **leases**, the lessor would purchase the equipment and then lease it to the lessee. For **loans**, the equipment purchaser would acquire the equipment using a loan from the lender. The **agent** also **facilitated business loans** not directly related to any specific asset purchase. The **agent's services** included

whether membership arrangement is a single supply

investigation of **credit worthiness**, **negotiating terms** of the financing arrangement, **registering security** and **other administrative services**. The lessor or lender retained final approval over each financing arrangement. CRA stated that the **agent** was making a **separate supply** for **each financing agreement** (not a single supply of administrative services to each issuer of leases or loans). **Arranging** for the **issuance** of a **loan** would be an **exempt financial service**. **Arranging** for a **lease** would be a **taxable supply**, as arranging a lease does not fall within the financial service definition.

- In a March 11, 2025 **Technical Interpretation** (247629, Sungjin Kim), CRA considered whether **delivering goods** ordered from an **online platform** would be a **zero-rated** supply. Where the **merchant or customer contracts** with the **platform** to provide the delivery services, and the **platform subcontracts the duty** to a third party, the **platform** would be providing a **taxable supply** and the **third party** would be **providing a zero-rated freight transportation** service (Excise Tax Act Schedule VI, Part VII, Subsection 1(2) and Section 11). Where the **platform itself** fulfills the orders, the **platform would be the shipper** and the **third-party delivery service** would be providing a **taxable supply** to the platform.

delivery services may or may not be zero-rated

EXEMPTION OF CERTAIN PSYCHOTHERAPY AND COUNSELLING THERAPY SERVICES

Certain **psychotherapists** and **counselling therapists** are **exempt** from **GST/HST** on their psychotherapist and counselling therapist **services** as of June 20, 2024 (see VTN [515\(7708\)](#) and [513\(7648\)](#)). Those providing these services may **not** need to **charge GST/HST** if they:

whether clients have properly updated their point-of-sale systems to reflect this change

- are **licensed** with a **provincial body** responsible for the **regulation** of psychotherapy services (regulated only in Ontario and Quebec) or counselling therapy services (regulated only in New Brunswick, Nova Scotia and Prince Edward Island); or
- **operate in a province** with **no regulatory body**, but have the **equivalent qualifications** required to meet the licensing requirements in a regulated province.

On April 24, 2026, CRA released [GST memorandum 25-3, Application of GST/HST to Psychotherapy and Counselling Therapy Services](#), which cancelled and replaced GST/HST Notice 334, Proposed Amendment – Exemption for Psychotherapy Services and GST/HST Notice 335, Proposed Amendment – Exemption for Counselling Therapy Services. Unless otherwise noted, the citations below refer to the relevant paragraph and examples from the memorandum.

CRA discussed the **application** of these **rules**, providing 34 examples to illustrate various concepts. They summarized the following four conditions that the service must meet for the supply to be exempt:

- be a **psychotherapy or counselling therapy service**;
- be rendered **to an individual by a practitioner**;
- be a **qualifying health care** supply; and
- **not** be a **cosmetic service** supply.

CRA also noted the following items and examples that may be of particular interest to practitioners:

- If a person **practices in a province that regulates the profession** of psychotherapy or counselling therapy, their services **must fall within the scope** of practice for the particular profession as **determined by the regulatory body** in that province (paragraph 16).
 - Example 19 – An individual **provides psychotherapy** services in Ontario but is **not registered** as a practitioner by the Ontario body (College of Registered Psychotherapists of Ontario, CRPO) that **regulates the profession**. As the individual is not registered with CRPO, they are not a practitioner of psychotherapy and the **exemption** from GST/HST for psychotherapy services does **not apply**. This may be the case where other healthcare professionals are permitted to provide psychotherapy services. Although the psychotherapy exemption would not apply, their services may be exempt under another provision.
- **Some associations** have **confirmed** with one or more **regulatory bodies** that **certain members** have the **qualifications equivalent** to those necessary to be licensed or certified in a province that regulates the respective profession, as follows (paragraph 35):
 - **Association of Counselling Therapy of Alberta** has confirmed equivalency with the College of Registered Psychotherapists of Ontario (CRPO);
 - **BC Association of Clinical Counsellors** has confirmed equivalency with the CRPO (see VTN [523\(8135\)](#));
 - **Canadian Association for Couple and Family Therapy** has confirmed equivalency with the CRPO; and
 - **Canadian Counselling and Psychotherapy Association** has confirmed equivalency with both the CRPO and the College of Licensed Counselling Therapists of New Brunswick.

if practicing in a province that regulates the profession, the practitioner must be licensed or certified by the regulatory body

clarity for those certified by these organizations

These **confirmed equivalencies** apply **only in provinces** that do **not regulate** these services.

- **Not all services provided** by a psychotherapist or counselling therapist may **be psychotherapy** or counselling therapy services for GST/HST purposes (paragraph 18).
 - Example 3 – In addition to providing psychotherapy or counselling therapy services, a **practitioner offers non-clinical services**, presentations and workshops. As these are neither basic health care nor qualifying health care supplies, they are not exempt services.
 - Example 24 – A **registered psychotherapist** is **subcontracted** by a **clinic** in Ontario to provide psychotherapy services to the clinic's clients. The specifics of the transaction and contract must be reviewed, as there may be two services being provided: one transaction between the psychotherapist and the clinic and another transaction between the clinic and its clients. Each supply must be reviewed to determine taxability.
- Providing **services of psychotherapy or counselling therapy** does **not** necessarily mean that the person practises the **profession** of psychotherapy or counselling therapy (paragraph 24). What **constitutes a psychotherapy service** or a **counselling therapy service** is determined by the **regulatory body** for that profession in the particular province and not by CRA (paragraph 15).
- The application of GST/HST to these services when provided **virtually by non-resident suppliers** was discussed in paragraphs 47 to 53.
- **Cancellation fees** paid by a client are treated as payment for the intended supply (paragraph 55).
- A psychotherapist or counselling therapist who has **charged** or collected **GST/HST in error** on an exempt supply may do either of the following (paragraphs 60 to 66; see VTN [517\(7845\)](#)):
 - **adjust the amount charged** if the amount has not been collected; or
 - **refund or credit** the amount **to the client** if the amount has been collected.

reviewing services provided to determine which are exempt and which are not

reviewing whether amounts were charged in error

A business that does so may deduct the amount when determining their net tax for reporting periods in which the credit note is issued.

Alternatively, the business can choose not to refund the amount; in that case, the **customer** can apply for a **refund from CRA**.

15 Did You Know...

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PHISHING RISKS

A May 20, 2026 [post](#) on CPA Canada's Tax360 portal from Ryan Minor, Director of Tax at CPA Canada discussed **accounting firms** being increasingly targeted by **phishing attacks**. Links were provided to three **videos** prepared in collaboration with CRA to **help accounting professionals** better **understand phishing risks**, **recognize common scam tactics** and **strengthen cybersecurity** practices within their firms, as follows:

- [Phishing 101 - What it is and what to watch for](#);
- [Helping clients and what to do if you're scammed](#); and
- [Protecting yourself and your clients - practical defenses](#).

reviewing these cybersecurity videos at your firm

UPCOMING COURSES

Tax Update 2026

Join us for our 42nd annual [Tax Update](#) seminar for a **practical** and **comprehensive review** of the **tax developments**, technical issues and administrative changes that will have the most impact on **owner-managed clients** and their advisors in the coming year.

preparing for the tax planning and compliance challenges that will shape 2026 and beyond

Presented by Caitlin Butler CPA, CA and Joseph Devaney CPA, CA, joined by either Hugh Neilson FCPA, FCA, TEP or Kenneth Keung CPA, CA, CPA (CO, USA), CFP, TEP, LLB, MTax, this 14-hour course will examine **legislative changes**, **CRA compliance initiatives**, planning **opportunities**, emerging **risks** and areas where **professional judgment** will be increasingly important. The many topics explored will include the complex new **dividend suspension rules**, the implementation of the **bare trust reporting** requirements and the latest **CRA projects and releases**.

Click [here](#) to see who is scheduled for your city or region. **Limited spaces** are available for in-person and virtual live offerings. In addition to securing your first choice, **early bird pricing** applies to registrations by **August 21, 2026**.

Bare Trust T3 Reporting: Practical Guide & Examples

Bare trust reporting is back, with **returns for 2026 due by March 31, 2027**. And with it comes **new exclusions**, **new exceptions** and **new traps** for the unwary.

upgrading your bare trust filing knowledge before returns are due in early 2027

Joint bank accounts, **in-trust-for accounts**, family **real estate arrangements** and **lawyer trust accounts** are just some arrangements that require careful consideration. In this **two-hour** pre-recorded [webinar](#), Caitlin Butler CPA, CA and Kenneth Keung CPA, CA, CPA (CO, USA), CFP, TEP,

LLB, MTax explore these and other **real-world examples**, providing a **practical framework** for identifying potential **bare trust arrangements** and assessing **filing obligations**.

Registrants will receive a **brandable client letter** that can be customized and distributed to clients as part of the trust reporting preparation process. Course **access** will also be **available** until **March 31, 2027**, allowing time to **refresh knowledge** as specific **client situations arise**, right **through the filing season**. For further information, click [here](#).

*brandable client letter
included*

16 Appendix

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APPENDIX A

Additional Video Tax News Resources and Recently Released CRA Publications and Forms

Video Tax News Resources

- [Video Tax News Members Portal and Newsfeed](#)
- [Video Tax News Members Portal – A How To Use The Portal Video Tutorial](#) (6 mins)
- [Status of Recent Tax and Benefit Proposals](#)
- [Tax on Split Income \(TOSI\) – Quick Reference Chart](#)
- [Underused Housing Tax \(UHT\) – Quick Reference Chart](#)
- [Life in the Tax Lane – 10 Minute Monthly Podcast/Video](#)
- [Technical Interpretations](#)

CRA Guides/Publications

- [17-10](#) Tax Discounters
- [2-1](#) Required registration
- [2-2](#) Small suppliers
- [17-6](#) Definition of Listed Financial Institution
- [17-6-2](#) GST/HST Registration and Reporting Requirements for Listed Financial Institutions, Including Selected Listed Financial Institutions
- [8-5](#) Becoming and Ceasing to be a Registrant
- [T4068](#) Guide for the Partnership Information Return (T5013 Forms) - 2025

CRA Forms/Statements/Returns

- [GST386](#) Rebate Application for Conventions
- [RC71](#) Statement of Discounting Transaction
- [RC72](#) Notice of the Actual Amount of the Refund of Tax
- [RC76](#) Application and Agreement to Obtain a Discounter Code / Discounter Direct Deposit Enrolment
- [B200](#) Excise Tax Return
- [T1521](#) Election for a Pertinent Loan or Indebtedness under Subsection 15(2.11)
- [T3](#) Statement of Trust Income Allocations and Designations



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