

**MOS 4462A - Advanced Issues in Canadian Taxation
Fall 2014**

Course Outline: Section 001

1. Course Information:

1.1. Class Location and Time:

Section	Instructor	Day	Time	Location
001	Pilling	Wednesday	6:00-9:00pm	Social Science Centre Room 3014

1.1. Instructor: Robert Pilling, CPA, CA

Office: SSC 4239

Office Hours: Wednesday 4:30 – 5:45pm

Friday 9:00 – 10:15am

Phone: 519- 661-2111 x [redacted] **To be updated shortly**

Email: [redacted] **To be updated shortly**

Website Address: <https://owl.uwo.ca/portal>

DAN Management and Organizational Studies strives at all times to provide accessibility to all faculty, staff, students and visitors in a way that respects the dignity and independence of people with disabilities. Please contact the course instructor if you require material in an alternate format or if you require any other arrangements to make this course more accessible to you. You may also wish to contact Services for Students with Disabilities (SSD) at 519-661-2111 ext 82147 for any specific question regarding an accommodation. More information about “Accessibility at Western” is available at: <http://accessibility.uwo.ca>

2. Calendar Description

This course deepens students’ understanding of the Income Tax Act (Canada) and its effect on business decisions. Analysis consists of complex taxation issues at the personal and corporate level as well as a variety of complex issues such as rollovers, estate planning and the taxation of trusts and international taxation.

Prerequisite(s): [MOS 3362A/B](#) and enrollment in 4th year of BMOS.

Pre-or Corequisite(s):

Extra Information: 3 lecture hours, 0.5 course.

2.1. Senate Regulations state, “unless you have either the requisites for this course or written special permission from your Dean to enroll in it, you will be removed from this course and it will be deleted from your record. This decision may not be appealed. You will receive no adjustment to your fees in the event that you are dropped from a course for failing to have the necessary prerequisites.”

2.2. Learning Outcomes:

Building upon the knowledge and skills of Introduction to Taxation in Canada – MOS3362A/B, students who successfully complete Advanced Issues in Canadian Taxation – MOS4462A/B will be able to:

- Assemble and properly arrange complex and diverse financial information in order to accurately calculate net income and taxable income for and federal income tax payable for corporations, trusts and taxpayers involved in partnerships. (AK)
- Identify opportunities to minimize tax consequences of financial transactions involving corporations and their shareholders and generate multiple solutions. (AK)

- Develop a solution to a tax planning scenario in order to minimize the tax consequences by balancing both short and long term taxpayer objectives and communicate their recommendations in a professional format. (CS)

3. Textbook: Byrd, Clarence and Chen, Ida.; Byrd and Chen's Canadian Tax Principles 2013-2014 Edition, Pearson Education Canada. Toronto.

4. Evaluation

In-Class Test (January 30, 31, 2014, 9:30 AM)	20%
Assignment (Due March 21, 2014, 2 PM)	20%
Final Examination (Date: April 11-30, TBA)	30%
Weekly in-class problems	20%
Participation – in class	<u>10%</u>
	<u>100%</u>

You must complete all written components to pass the course.

There are no exceptions to this. Extra assignments to improve grades will **NOT** be allowed. Grades will not be adjusted on the basis of need. It is important to monitor your performance in the course. Remember: **You are responsible for your grades in this course.**

HOW TO DO WELL IN THIS COURSE:

This is not a class for sitting back and watching. You have to be willing to do tax in order to understand tax.

I will be teaching new material by working through problems, and you are expected to be actively engaged in this process. You will not merely copy down solutions; you will determine solutions to problems during class. Some of the in-class problems are listed on the course outline. Some are not. There will be additional problems to help you become more competent with the material. This will often involve collaborating with other students. Some in-class work will need to be submitted each week as part of your grade.

Please keep these things in mind:

- 1) Come to class every class, no exceptions.
- 2) There are two types of PowerPoint slides used. There is a detailed set which is a comprehensive summary of the textbook, and then there is a set that the instructor will use in class.
 - a. Read the detailed PowerPoint slides *before* each class. Use the textbook when you need more detail than the PowerPoint slides contain. [It's actually well-written and rather interesting...]
 - b. You may want to bring a computer to class so you can make notes on the in-class slides, and refer to the detailed slides while doing problem work.
- 3) Do the practice Exercises from the text book as you go through the PowerPoint slides. When doing the exercises, do not look at the solutions first. Please allow yourself to benefit from the process of making mistakes. After you complete an exercise, check the Study Guide to see how you did, and make a note of anything that was confusing. Make sure that you understand the correct solution before moving on.
- 4) Attempt the Assignment Problems before the class in which they will be discussed.
- 5) Stay up to date with the material; you can't afford to fall behind.
- 6) Do as many extra problems as you possibly can find time for.

Important: This is not a course to take for easy credit. It is extremely challenging, and there is an incredible amount of information for you to learn and to remember. No two problems look alike. Watching me do tax problems in class might be fun (but probably isn't), however, it won't help you do tax problems on your own. My number one hint is: Practice. That is also my number two and three hint.

PRACTICE PRACTICE PRACTICE

5. In-Class test and Final Exam: You must complete all written components in order to pass the course.

The exams will consist of a combination of multiple choice questions and problems, similar to problems assigned from the textbook. You will be permitted to bring writing materials, a calculator and 2 sheets of notes (8.5" x 11" pages, double sided). **Note sheets must be handwritten and personally created by you. This means that material from another source must go through your eyes, into your brain, and then be transferred onto the page by writing it by hand. The pages cannot be photocopied from some other source. Typed note sheets will be taken away at the exam. Under no circumstances can you use notes prepared by another student.**

Should there be any concerns about your note sheets during an exam, they will be taken away from you. No other items will be permitted at your desk in the examination room. This includes dictionaries, cell phones, PDA's, CD players, iPod's, etc. Having an electronic device on your person during an exam is considered an academic offence, whether you use it or not, and that can result in a grade of 0 on the assessment in question. These rules will be strictly enforced as it is my responsibility to do everything possible to prevent cheating on examinations.

6. Tax Assignment: You must complete all written components in order to pass the course.

There will be one hand-in assignment required for this course. The distribution and due dates are listed in the table above. The assignment will require you to research tax issues and develop an opinion on the appropriate treatment of a variety of situations for tax purposes. The assignment will also require you to complete detailed tax calculations for a corporation. You will be required to submit your explanation of what you believe to be appropriate treatment for any issues described. Research materials you may use might include the *Income Tax Act*, the textbook, other CRA publications such as Folios, Information Circulars, and other tax related publications.

Assignment submissions must demonstrate professionalism. They do not need to be typed, but they must be well referenced (show all calculations, label all numbers) and must demonstrate a thorough understanding of the corporate tax system in its entirety. Please review the learning outcomes for this course for more details on what the expectations are.

It is fine for you to work with another student or group (of up to 4 students in total) to complete the assignment. Groups must consist of students who have the same instructor. Groups may submit one assignment for all members. If agreement cannot be reached on the tax treatment of some items then some group members may wish to submit an individual assignment. In this case, please indicate the names of all people consulted in completing the assignment. You may only work on the assignment with other students who are currently enrolled in the course, and who have the same instructor as you do.

If you work in a group, your group must meet together with the instructor. At this meeting, you will be asked questions about the assignment, and questions will be directed to specific students. It will therefore be critical that all members of a group completely understand the submitted work.

Beware of working in groups and using material provided by other students without proper referencing – this will be considered cheating if it is detected. **Plagiarism is a serious academic offence that can result in a penalty as severe as expulsion from the University.** Whenever you take an idea or a passage from another author, you must acknowledge your debt by using quotation marks where appropriate, and by proper referencing such as footnotes and citations. Western has software available to check for plagiarism, and you may be required to submit your work in electronic form so that it can be checked by this software.

7. Weekly Hand-In Problems: You must complete all written components in order to pass the course.

For most weeks of the course there will be a problem, or several problems, assigned for completion during class. You will be able to work on these problems with other students in the class. At the end of the class, the problems will be handed in to the instructor, who will mark them and return them to you by the following week. These problems will not be scheduled in advance, although I expect to give at least one problem set per

week, and there may be more than one. You are to come to class prepared to complete problems on the assigned chapter, in anticipation of having a problem to complete given to you in class.

As it is recognized that on occasion some students may need to miss a class during the term, I will remove your two lowest grades when determining the grade allocated to this component of your final grade. If more than 2 classes are missed, and documentation is provided to Academic Counseling to demonstrate that these absences are legitimate, then that portion of the hand-in grade will be added to your final exam.

8. Participation:

10% of your grade will be based on your participation. There are three ways to earn participation marks.

- Attend class
- Participate fully in class discussions of chapter material by posing questions, or by answering questions asked by the instructor.
- Demonstrate your engagement in completing the assigned work to be completed during class.

Marks will be awarded each class out of 3 possible points. 1 point will be given to those students who attend class but do not participate, as long as they demonstrate they are focused on the class material throughout. A second mark will be given to those students who participate in a positive manner at least once during the class. A third mark will be given to students who participated at an exceptional level during the class.

PLEASE NOTE: **Participation marks must be earned.** They are not negotiable, however it is important that you understand why you get the mark that you do, so I am always available to discuss matters like this, and I will provide feedback on how you are doing at least once during the term. If you wish to have more frequent feedback, please let me know. Using your cell phone, or computer inappropriately during class will have a negative effect on your participation grade.

Generally, assigned problems will be taken up during the class in which they are assigned, or the following class. I will post solutions on OWL after they are taken up in class. It is helpful to your preparation for class if you look at the problems and think about what you need to know and clarify in the class that they are assigned above. This will make it easier for you to prepare your solutions over the time between assignments and take up of questions. Also, please note that the answers to the Exercises and Self Study Problems throughout the text are in the Study Guide provided with the text book. These exercises serve as additional work that you can complete to ensure you understand the material in the chapter, and to prepare for tests.

9. University Policy Regarding Illness

9.1. Illness

The University recognizes that a student's ability to meet his/her academic responsibilities may, on occasion, be impaired by medical illness. Illness may be acute (short term), or it may be chronic (long term), or chronic with acute episodes. The University further recognizes that medical situations are deeply personal and respects the need for privacy and confidentiality in these matters. However, **in order to ensure fairness and consistency for all students, academic accommodation for work representing 10% or more of the student's overall grade in the course shall be granted only in those cases where there is documentation supplied (see below for process) indicating that the student was seriously affected by illness and could not reasonably be expected to meet his/her academic responsibilities.**

Documentation shall be submitted, as soon as possible, to the appropriate Dean's office (the Office of the Dean of the student's Faculty of registration/home Faculty) together with a request for relief specifying the nature of the accommodation being requested. These documents will be retained in the

student's file, and will be held in confidence in accordance with the University's Official Student Record Information Privacy Policy [<http://www.uwo.ca/univsec/handbook/general/privacy.pdf>].

Once the petition and supporting documents have been received and assessed, appropriate academic accommodation shall be determined by the Dean's Office in consultation with the student's instructor(s). Academic accommodation may include extension of deadlines, waiver of attendance requirements for classes/labs/tutorials, arranging Special Exams or Incompletes, re-weighting course requirements, or granting late withdrawals without academic penalty.

Academic accommodation shall be granted only where the documentation indicates that the onset, duration and severity of the illness are such that the student could not reasonably be expected to complete his/her academic responsibilities. (Note: it will not be sufficient to provide documentation indicating simply that the student was seen for a medical reason or was ill.)

A form to be completed by off-campus physicians is available at:

<http://counselling.ssc.uwo.ca/docs/procedures/medicalNote.pdf>

Whenever possible, students who require academic accommodation should provide notification and documentation **in advance of due dates, examinations**, etc. Students must follow up with their professors and their Academic Counselling office in a timely manner.

In the case of a final examination in the course, the student must arrange for a Special Examination or Incomplete through their Dean's office, for which you will be required to provide acceptable documentation.

If you feel that you have a medical or personal problem that is interfering with your work, you should contact your instructor and the Faculty Academic Counselling Office as soon as possible. Problems may then be documented and possible arrangements to assist you can be discussed at the time of occurrence rather than on a retroactive basis. In general, retroactive requests for grade revisions on medical or compassionate grounds will not be considered.

9.2. Make Up Examinations

- The student must write a make-up exam if the regularly scheduled exam is missed for reasons for which adequate documentation is received by the instructor (this documentation must be supplied by the Academic Counseling office).

9.3. Attendance

- It is expected that students will attend all classes. If you miss a class, lecture notes are scanned and posted online after class is over.

10. University Policy on Cheating and Academic Misconduct

10.1. Cheating on exams will not be tolerated; students are referred to the university policy on scholastic offenses (see section 9.0 below). Looking at the test of another student, allowing another student to view your exam, or obtaining information about a test in advance are all examples of cheating. Students found cheating will receive a zero (0%) on that exam. A number of safeguards will be employed to discourage cheating. For example, examination supervisors (proctors) of the tests may ask students to move to another seat during the exam, cover their paper, avert their eyes from other students' papers, remove baseball caps, etc. This is not meant as a personal affront nor as an accusation of cheating, rather as vigilant attempts at proctoring. A copy of guidelines about how to avoid cheating can be obtained from the office of the Ombudsperson, Room 251 University Community Centre, (519) 661-3573.

10.2. Students are responsible for understanding the nature of and avoiding the occurrence of plagiarism and other academic offenses. Students are urged to read the section on Scholastic Offenses in the Academic

Calendar. Note that such offenses include plagiarism, cheating on an examination, submitting false or fraudulent assignments or credentials, impersonating a candidate, or submitting for credit in any course without the knowledge and approval of the instructor to whom it is submitted, any academic work for which credit has previously been obtained or is being sought in another course in the University or elsewhere. If you are in doubt about whether what you are doing is inappropriate, consult your instructor. A claim that "you didn't know it was wrong" will not be accepted as an excuse.

- 10.3.** The penalties for a student guilty of a scholastic offense include refusal of a passing grade in the assignment, refusal of a passing grade in the course, suspension from the University, and expulsion from the University.

11. Procedures For Appealing Academic Evaluations

- 11.1.** In the first instance, all appeals of a grade must be made to the course instructor (informal consultation). If the student is not satisfied with the decision of the course instructor, a written appeal must be sent to the Assistant Program Director or Designate of the BMOS program. If the response of the Assistant Director is considered unsatisfactory to the student, he/she may then appeal to the Dean of the Faculty in which the course of program was taken. Only after receiving a final decision from the Dean, may a student appeal to the Senate Review Board Academic. A Guide to Appeals is available from the Ombudsperson's Office.

12. Student Responsibilities

- 12.1.** Material covered in lectures will not always be the same as material covered in the textbook. These two sources should be viewed as complimentary and not redundant. As such, students who want to do well in this course are **strongly encouraged** to attend lectures on a regular basis. Please note that the instructor will not be providing copies of lectures notes or overheads. Therefore, if you miss a lecture, you should try to obtain this material from another student.

In this class, some students may be unaware that their private discussions are distracting to other people. If you feel that students are distracting your attention from the material, then you should ask them to be quiet. If you feel uncomfortable doing this (or the problem persists), then please see the instructor. In addition, please avoid engaging in private discussions with other students during the lectures.

To avoid unnecessary distractions, please arrive to each class on time.

13. Support Services

13.1. Support Services

The Registrar's office can be accessed for Student Support Services at <http://www.registrar.uwo.ca>
Student Support Services (*including the services provided by the USC listed here*) can be reached at:
<http://westernusc.ca/services/>

Student Development Services can be reached at: <http://www.sdc.uwo.ca/>.

- 13.2.** Students who are in emotional/mental distress should refer to Mental Health@Western
<http://www.uwo.ca/uwocom/mentalhealth/> for a complete list of options about how to obtain help."

14. Other Issues

14.1. Grade Policy

The DAN Program has a grade policy which states that for courses in the 4000 range, the class average must fall between 70% and 75% for all sections of a course taught by the same instructor. In very exceptional circumstances only, class averages outside this range may be approved by the Assistant Director or Director. Class averages are not grounds for appeal.

14.2. Short Absences.

If you miss a class due to minor illness or other problems, check your course outlines for information regarding attendance requirements and make sure you are not missing a test or exam. Cover any readings and arrange to borrow the missed lectures notes from a classmate.

14.3. Extended Absences.

If you are absent more than approximately two weeks or if you get too far behind to catch up, you should consider reducing your workload by dropping one or more courses. The Academic Counsellors can help you to consider the alternatives. At your request, they can also keep your instructors informed about your difficulties.

14.4. Academic Concerns.

If you are in academic difficulty, it is strongly recommended that you see your academic counsellor.

14.5. Important Dates:

September 4, 2014 Fall Session classes begin.

September 12, 2014 Last day to add a full course, a first-term half course, a first-term full course, or a full-year half course

October 30 & 31, 2014 Fall study break

November 5, 2014 Last day to drop a first-term half course or a first-term full course without academic penalty

December 3, 2014 Fall/Winter Term classes end.

December 4 & 5, 2014 Study Days.

December 6-17, 2014 Mid-year examination period.

15. Other Information

- Bring student identification to exams.
- Nothing is to be on/at one's desk during an exam except a pencil, an eraser, and the individual's student card
- Do not wear baseball caps to exams
- Do not bring music players, cell phones, beepers, or other electronic devices to exams

For The University of Western Ontario Senate Regulations, please see the Handbook of Academic and Scholarship Policy at: http://www.uwo.ca/univsec/academic_policies/index.html