

# Moodys Tax Advisors present at Canadian Tax Foundation Prairie Provinces Tax Conference

Moodys  
June 4, 2013

As discussed in previous blogs, the Canada Revenue Agency has been auditing taxpayers who have attempted to shift the taxation of their income away from their “home” province to a lower tax rate province – such as Alberta. Canadian courts are hearing more and more provincial “rate shopping” cases. Further, declining corporate and personal tax rates, the introduction of the eligible dividend regime in 2006 and recent legislative changes to eliminate “tax product” planning are factors that have influenced owner-managers of private corporations to seek additional methods to reduce their overall tax burden.

The topics mentioned above, in addition to other noteworthy tax updates, were covered at The Canadian Tax Foundation Prairie Provinces Tax Conference, held on May 27 & 28, in the same city where Moodys recently opened a new office – Edmonton, Alberta. Partners Kim G C Moody and Greg Gartner presented at the well attended conference on topics covering Owner Manager Remuneration and Provincial Residency, respectively.

Greg’s presentation reviewed the legislative framework under which provincial income taxes for individuals are levied. The definition of “residence” and a number of current cases with respect to provincial residency were also analyzed. As well, dispute resolution mechanisms for individuals who wish to challenge an assessment related to provincial residency were canvassed. Please click [here](#) to download the paper authored by Greg, *Residence of Individuals*.

Kim’s presentation examined the impact of changes to corporate and personal tax rates, “old rules” vs. “new rules of thumb” for owner-manager remuneration, planning strategies to consider and “buyer beware plans.” Please click [here](#) to download the paper authored by Kim entitled *Owner Manager Remuneration – Current Trends, Strategies and Challenges*.