

Tax and AC/DC

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Those of you who know me well will know that my first career choice was to be a music teacher. I studied and played music classically well into my teens. When I realized that my talents would likely not provide me a stable living, I switched gears and became a Chartered Accountant. I still love music – all types of music with a few exceptions – but I have a soft spot for classic rock which is often playing in my office. One of my all time favorite bands is AC/DC. Their straight-ahead blues rock with very simple (almost comical) lyrics is exactly what I like to listen to when I need to turn my brain off (which doesn't happen very often). Accordingly, I couldn't pass up the opportunity to attend AC/DC's concert in Edmonton on September 20, 2015, with my fellow directors of Moodys Gartner Tax Law – Greg Gartner, and Dale Franko. It was a cold and wet night, but that didn't dampen the spirit of the crowd.

Classic rock concerts and tax go together like wine and cheese. The last time that AC/DC was on tour in Canada was 2009 and I attended their concert in Vancouver. I wrote a blog about [tax and AC/DC](#) back then and I'm continuing that tradition here. So what was I thinking about while listening? Well, here was their set list and each song inspired a different thought about tax:

1. [Rock or Bust](#) – This is AC/DC's lead single from their latest album. It's classic AC/DC and a very short song. The main anthem is “...*in rock we trust, it's rock or bust...*” That line reminds me of the Income Tax Act and the Internal Revenue Code. We trust that the answer to most tax questions is in the Income Tax Act or Code, related case law and guidance from Canada Revenue Agency (CRA) or Internal Revenue Service (IRS) administrative positions. If you're getting your tax guidance from anywhere else, it's a bust.
2. [Shoot to Thrill](#) – This single is from AC/DC's 1980 *Back in Black* album. It reminds me of professionals who are not qualified to dispense tax advice but get a thrill in dispensing such advice. Unfortunately, much of their “advice” will often get “killed” when reviewed by the CRA/IRS and the taxpayer will not be thrilled.
3. [Hell Ain't a Bad Place to Be](#) – This is one of the tracks from the *Let There Be Rock* album released in 1977. Some tax fraudsters – like those that we recently [wrote](#) about – likely fool themselves into believing that hell ain't a bad place to be.
4. [Back in Black](#) – This is the namesake single of the smash 1980 album of the same name released shortly after their former lead singer, Bon Scott, died. It has been [reported](#) the album's all-black cover was designed as a “sign of mourning” for Scott. Given such, this song and album reminds me of the tax consequences of death. Death can cause deemed dispositions at fair market value for Canadian purposes. It can also cause US estate tax to be payable for US citizens or persons domicile in the US. Canadians can also pay US estate tax on any US situs property that is owned. The old saying is true... “In this world, nothing can be said to be certain, except death and taxes.”
5. [Play Ball](#) – This was the first single released from AC/DC's new album. While the song is not necessarily about professional athletes, it reminds me of the significant tax challenges that athletes have when dealing with contracts – especially when they have cross-border earnings.
6. [Dirty Deeds Done Dirt Cheap](#) – This was the title track from AC/DC's third studio album which

was released in 1976. While the song is clearly about murder for hire, the song always reminds me of tax advisors who lead clients down the wrong path and take pleasure in doing so by offering cheap rates. Unfortunately, similar to victims of hitmen, the ones wronged by cheap tax advisors can pay the price for years to come.

7. [Thunderstruck](#) – One of the most successful tracks from AC/DC's 1990 album *The Razors Edge*, it always reminds me of the way I feel when I read the Income Tax Act or the Internal Revenue Code. I'm thunderstruck with both tax statute's horrific complexity and intricacy.
8. [High Voltage](#) – The title track from AC/DC's first internationally released album in 1976, this song always reminds me of the high energy that our firm's team has to solve complex tax problems.
9. [Rock 'n' Roll Train](#) – This is the first single from AC/DC's 2008 *Black Ice* album and was very popular. Given the train analogy, this single always reminds me of how much of a runaway mess a person's tax affairs can become if they are not always on top of it.
10. [Hells Bells](#) – One of the most popular singles from the band's 1980 *Back in Black* album, it is known for the slow haunting tolling of a bell in its introduction. The tolling of the bell reminds me of a CRA or IRS auditor coming to audit a taxpayer. Will the tolling signify the beginning of a tax audit hell or, with proper leadership, will the bell lead the taxpayer to escape from the clutches of tax satan?
11. [Baptism by Fire](#) – This is one of the singles from AC/DC's new *Rock or Bust* album. The name of the song reminds me of tackling new tax issues that I haven't addressed before. It's a baptism by fire every day. Yes... there's plenty of tax issues that are "new" to me every day. Any honest senior tax practitioner will tell you the same thing. Tax is too difficult of a subject area to know it all. I'm learning every day. Tax needs careful reflection and analysis on each issue no matter how "routine" one might think it is.
12. [You Shook Me All Night Long](#) – This is one of the most heavily radio-played singles from AC/DC. You'll be hard-pressed to find a person of my vintage who doesn't know this song. I often use it as motivation to try and solve tax problems when I come home and go to bed. After shaking and tossing and turning all night with the problem, I often jump out of bed and, while having a shower – voila!! – I've come up with a possible solution! Off to the office to do the research and see if it works!
13. [Sin City](#) – This single was from AC/DC's fourth internationally released album, *Powerage*, in 1978. According to the font of all wisdom, [Wikipedia](#), *Sin City* is an urban area that caters to various vices – legal or illegal. Given such, this song reminds me of the most common example of a sin city – Las Vegas. Whenever I'm in Las Vegas, I admire all of the tax revenue being collected by the large casinos for the coffers of the IRS. As many Canadians know, gambling profits are generally non-taxable in Canada; not so in the US.
14. [Shot Down in Flames](#) – One of the singles from AC/DC's 1979 *Highway to Hell* album, this single is often used by my favorite hockey team – the Calgary Flames – to provide impact after the hometown favorites score a goal. From a tax perspective, it also trumpets through my head whenever we attack one of the CRA or IRS assessing positions on behalf of a client. Once we are successful in having the reassessments reversed, we celebrate since the original proposal was shot down in flames!
15. [Have a Drink on Me](#) – Another single from the wildly successful *Back in Black* album, this song reminds me about taxable benefits. If I provide benefits or gifts to people (or if I receive benefits or gifts) are there tax consequences? You'll be surprised how often there ARE tax consequences.
16. [T.N.T.](#) – A single from the 1976 *High Voltage* album, this song reminds me of many "tax plans" developed by clients that have gone wrong. Sometimes, when I'm reviewing the "plans" that have been poorly thought out or executed, I just want to "blow up" the plan and start over. And often, that's exactly what we do.
17. [Whole Lotta Rosie](#) – A very popular single from the 1977 *Let There Be Rock* album, the lyrics of

the song describe a night of passion by the then lead singer of the band, Bon Scott. It reminds me to always continue to not accept the status quo when developing tax plans for our clients. Often times, the facts and objectives are not as simple as they appear and the development of tax plans can lead to creative and passionate results!

18. [Let There Be Rock](#) – The title track from the *Let There Be Rock* album, this song always reminds me of higher powers. For tax matters, such higher powers are often the Courts, CRA, IRS, the Department of Finance, and US Treasury. Where would the tax world be without such higher powers? Certainly not in a good spot. Accordingly, let there always be the Courts, CRA, IRS, the Department of Finance, and US Treasury.
19. [Highway to Hell](#) – The title track from their 1979 album, this song always reminds me of how clients will be on a highway to hell without proper tax advice... especially in cross-border matters involving Canada/US tax matters.
20. [For Those About to Rock \(We Salute You\)](#) – The title track from AC/DC's 1981 album, this song always reminds me of how much I appreciate the passionate people I work with to solve clients' tax problems and be on top of their tax affairs. Consider yourself saluted!

Well, there you have it. My ode to AC/DC and tax! Thanks for making it all the way through. I'm sure you'll wholeheartedly agree with my opening line that classic rock concerts and tax go together like wine and cheese! It was a phenomenal concert... in tax we trust. G'day Mate!