Exhibit 1
KASB Members

Effective as of October 1st, 2017

Len Anderson	Angela Fallow	Patrick Legresley	Tyler Rider	Paul Tierney
Lisa Asbreuk	Carrie Fenton	Matt MacEwen	Lennox Rowsell	Peter Tobias
Eric Bennett	Jennifer Fisher	Robert Maratta	Karen Sands	Cormac Trainor
Matt Benson	Glen Fitzpatrick	James McDonald	Andrew Sapiano	Peter Trousdale
Jeff Blay	Steve Gammon	Patience McLeod	David Saunders	Joe Vanniedeck
Angela Brown	Mike Gaylord	Meagan McLeod	Susan Shurtleff	Jonathan Warren
Ross Burns	Lynlee George	Ryan Moore	Karen Simpson	Alan Whyte
Cara Chesney	Peter J. Gibson	Kevin Mooy	Jennifer Sims	Richard A. Withey
Daniel Coderre	Jeff Hanley	Leanne Moran	Jason Skilnick	Richard I. Withey
John Crouchman	Scott Kehoe	David Munday	Sean Tait	Brent Wilson
Meghan Davis	Lesley Kendall	Elspeth Murray	Lee Tessmer	Adam Young
David Doyle	Colleen Lawrie	Shanil Patel	Daniel Thornton	

Exhibit 2

KASB Information Session to Kingston and Area Residents
On September 19th, 2017 at the Delta Kingston Hotel

- DVD copy of the KASB Information Session
- A link to KASB facebook page and interview with Station 14 that took place after the information session
- KASB article in respect of the information night.

On Tuesday September 19th, 2017 a standing room only crowd of local residents and business owners filled the Delta Kingston convention room to gain information about the July 18th, 2017 tax reforms that were proposed by the Department of Finance.

KASB sought to put on an information night because this group that is made up primarily of accountants and lawyers are finding that local residents, including business owners, are generally unaware of what the tax changes are. This was evident early on in the presentation when KASB member Jason Skilnick asked the crowd, "put up your hand if you are concerned about what impact the proposed tax changes will have on small businesses and our community". All hands were raised up in the air. Mr. Skilnick then asked the crowd, "Keep your hand in the air if you understand why?" Almost everyone's hands dropped.

The point was of course, how can the government not extend the consultation and slow down the enactment of the tax reforms when people have not been properly informed. This is one of KASB's main concerns in that the government, and in particular Finance Minister Mr. Morneau, has not informed Canadians who would be adversely affected by the tax changes, including middle-class small business owners.

Four main themes were introduced that would be heard throughout the evening. The proposed tax changes would mean:

1. Increased complexity for small businesses
2. Increased uncertainty for small businesses
3. Some changes are retroactive 'in impact'
4. Increased compliance and advisory costs

Technical information was presented by KASB members who are local tax specialists: Colleen Lawrie, Jonathan Warren, Sean Tait, and Peter Gibson. These members are each tax practicing CPA's who specialize in providing tax advice to small businesses locally. The detailed sections presented in respect of the proposed tax changes were:

- Income Splitting
- Passive Income
- Dividends being converted into capital gains
    - i. Estate Planning Issues
    - ii. Succession Planning Issues

A summary was then given how the tax changes would negatively impact small businesses based on the four themes:

Increased Complexity

- Tax advisors do not know what all the rules mean, how can a small business owner?
- What is 'reasonable' will be assessed by the CRA; are they going to be adequately trained by January 1st, 2018 (effective date for income splitting rules) in private company valuations and understand the business risks of a small business?
- The rules would require analysis dating back to the formation of the company. No one told small business owners to keep detailed records of remuneration, risks assumed and capital contributed dating back to the date of the incorporation of their business? What happens when CRA asks to see this documentation, but it does not exist?

Increased Uncertainty

- Small business owners are paralyzed right now from a planning perspective because they do not know which laws to plan under (laws prior to July 18th, 2017, Laws proposed on July 18th, 2017, some modified form of our existing laws, or some modified form of the proposed laws). Many of the proposed laws are effective as of July 18th, 2017 *if enacted in their current form*. Others become law January 1st, 2018.

- Do businesses plan their affairs under the draft legislation? The current legislation? The draft legislation with some unknown tweaks? The current law with some tweaks?

- We do not have enough time to properly transition a business from the pre-July 18th, 2017 laws, without unintended consequences. We need at least a 12-month transition period from the date the law stops moving to adjust.

Retroactive 'in Impact'

- It is not fair if a change in law in a manner that unwinds decades of retirement planning. This would happen in many cases if these laws are enacted in their current form.

- Many businesses have used life insurance policies to help transition a business from one generation to the next. The proposed rules (new section 246.1) may unwind these plans on a dime, by not permitting capital dividend amounts to be paid out tax free.

- Changes to 84.1 would mean that tax planning in the family context could be impacted in a manner that requires analysis of family transitions dating back to 1972 (when capital gains tax came into effect).

Increased Fees & Taxes

- More complex rules means higher fees to pay accountants and lawyers

- Some estates will be pushed into double and triple tax scenarios where the total tax in some cases will be at least (minimum) 73%, but it can be higher if assets have to be liquidated inside a company.

In the question period, there was an interesting point in the night when one concerned Kingston resident asked, "Business owners have to save for their retirement through their company and have risk and it is not fair to compare them to a government worker who has a guaranteed pension". Certainly the communication approach adopted by the Department of Finance with these changes, admittedly by the government, is 'regrettable', or as Liberal M.P. Wayne Easter put it, "god awful!"

KASB's view and response to this question was, "Even as recent as yesterday, Prime Minister Trudeau was still putting doctors against nurses in the House of Commons. We do not think putting one group of Canadians against another group is right. We believe both employees and business owners are valuable contributors to Canada and we should be taking steps that bring Canadians together, rather than making divisive comments." It was a special moment when the group of 140 plus in the room clapped.

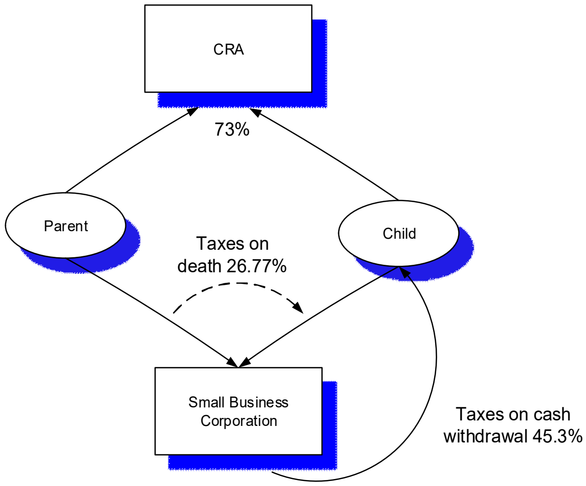
KASB points out that the presentation was really just the 'tip of the iceberg' in terms of what the negative impact would be on small businesses. We also make it clear that we do not disagree with some of the Department of Finance's Policy Objectives are, but rather that the policy objectives will not be achieved by the draft legislation, on a consistent basis. This will result in many small businesses being negatively affected. We are not saying in all situations, but in enough situations that we are requesting a slow down of process and that we undertake a comprehensive review of our tax system as a nation. Where the policy objectives are not achieved, we believe that small businesses will be disproportionately hurt, which will in turn hurt our communities.

KASB thanks everyone who took the time to learn more by coming to the information night. A video of the information night will be made available soon as well as the presentation information via our facebook page.

We only have Until October 2nd to provide feedback to your M.P. and the Finance Minister, Mr. Morneau. Our ask is that concerned residents email these people and inform their friends and coworkers. We do not have much time left, but it is not too late to put the brakes on the proposed legislation. We also ask that you share our facebook information so some can become educated by the approximately 60 people who make up KASB.

Exhibit 3
Calculations to Support the Estate Double Tax Scenario

Comparison of Taxes Payable on the shares of a small business corporation on death
July 18, 2017 Proposed Measures



				Remains in family		Remains in family
			Scenario 1	**Scenario 2**	**Scenario 3**	**Scenario 4**
			Sale to 3rd Party	*Tax Planning 1 yr*	*Missed Tax Planning*	No Longer Available
Death of Owner						
Deemed FMV of corporation on date of death			$ 600,000.00	$ 600,000.00	$ 600,000.00	$ 600,000.00
Adjusted cost base of shares held			$ 1.00	$ 1.00	$ 1.00	$ 1.00
Capital Gain			$ 599,999.00	$ 599,999.00	$ 599,999.00	$ 599,999.00
Personal taxes on capital gain	A	26.76%	$ (160,559.73)	$ (160,559.73)	$ (160,559.73)	($160,559.73)
Subsequent extraction of funds by Estate/Beneficiary						
Dividend to Child			$ -	$ 599,999.00	$ 599,999.00	
Personal Taxes on Dividend	B	45.30%	$ -	$ (271,799.55)	$ (271,799.55)	
Proceeds on sale of corporation to third party			$ 600,000.00	$ -	$ -	
Proceeds on sale of corporation to family holding company						$ 600,000.00
Adjusted cost base of shares received from Estate			$ 600,000.00	$ -	$ -	$ 600,000.00
Capital Gain			$ -	$ -	$ -	$ -
Personal taxes on capital gain	C	26.76%	$ -	$ -	$ -	$ -
Tax Planning within 1 year of death (if possible/permitted)						
Loss carryback to Estate terminal return			$ -	$ (599,999.00)	$ -	$ -
Refund of taxes	D	26.76%	$ -	$ 160,559.73	$ -	$ -
Final overall Taxes paid to the Canada Revenue Agency	**A+B+C+D**		**$ (160,559.73)**	**$ (271,799.55)**	**$ (432,359.28)**	**$ (160,559.73)**
After-tax cash retained by beneficiaries of estate			**$ 439,440.27**	**$ 328,200.45**	**$ 167,640.72**	**$ 439,440.27**
Effective Tax Rate			**26.76%**	**45.30%**	**72.06%**	**26.76%**

Death of owner

Taxes are payable on the difference between the fair market value ("FMV") and the adjusted cost base of the small business corporation shares. This is taxed in an individual's terminal return at capital gains rates.

Subsequent extraction of funds and tax planning

In order for the Child to pay the tax liability of the estate they must remove funds from the corporation or obtain the funds by selling the corporation to a third party.

Scen. 1 Selling the corporation to a third party will not result in a second capital gain as a result of the Child taking over the adjusted cost base of the shares from the Estate; an amount which is equal to the fair market value of the shares on death. If sold for the same price, there will be no secondary gain to the Child.

The subsequent removal of funds from the corporation will result in a deemed dividend to the Child and a capital loss on the shares.

Scen. 2 If planning is able to be put in place within one year of the death, the capital loss is allowed to be carried back and offset the previous gain.

Scen. 3 If planning cannot be completed within this one year, the capital loss is not permitted to be carried back to offset the gain on death.

Scen. 4 Previous to the July 18, 2017 proposals, in certain cases the Child could transfer the shares to a family holding company in exchange for debt from that holding company (referred to as 'Pipeline' planning on death). The proposed changes to Section 84.1 will now prevent this type of planning in the future.

Potential additional taxes to the above

If the company does not have the $600,000 in cash available for the Child to extract after death, then the corporation will need to liquidate a portion, or all, of its assets to generate these funds. The above example does not include the additional taxes that may be borne by the company in such a situation. This would raise the effective tax rate from the 45.3% or 72.06% noted above.

Exhibit 4
Calculations to Support the Estate Double Tax Scenario

Comparison of taxes payable on the shares of a family business corporation - intergenerational transfer
July 18, 2017 Proposed Measures

Scenario: Father wants to exit his family business which has a fair market value of $600,000

				Remains in family	Remains in family	Remains in family
			Scenario 1	**Scenario 2**	**Scenario 3**	**Scenario 4**
			Sale to 3rd Party	*Redemption by Father*	*Purchase by Son*	No Longer Available
Sale of family business by father						
Proceeds received on sale of business			$ 600,000.00		$ 600,000.00	$ 600,000.00
Adjusted cost base of shares held			$ 1.00		$ 1.00	$ 1.00
Capital Gain			$ 599,999.00	$ -	$ 599,999.00	$ 599,999.00
Personal taxes on capital gain	A	26.76%	$ (160,559.73)	$ -	$ (160,559.73)	($160,559.73)
Extraction of funds from company						
Dividend (or deemed dividend) paid to family member			$ -	$ 600,000.00	$ 599,999.00	
Personal Taxes on Dividend	B	45.30%	$ -	$ (271,800.00)	$ (271,799.55)	
Proceeds on sale of corporation to family holding company						$ 600,000.00
Adjusted cost base of shares received from father				$ -	$ -	$ 600,000.00
Capital Gain				$ -	$ -	$ -
Personal taxes on capital gain	C	26.76%		$ -	$ -	$ -
Final overall Taxes paid to the Canada Revenue Agency	**A+B+C**		**$ (160,559.73)**	**$ (271,800.00)**	**$ (432,359.28)**	**($160,559.73)**
After-tax cash retained by family			**$ 439,440.27**	**$ 328,200.00**	**$ 167,640.72**	**$ 439,440.27**
Effective Tax Rate			**26.76%**	**45.30%**	**72.06%**	**26.76%**

Sale of Family Business by Father

Taxes are payable on the difference between the fair market value ("FMV") and the adjusted cost base of the family business corporation shares. This is taxed in an individual's personal tax return at capital gains rates.

Extraction of funds from the small business

Scen. 1 A sale of the shares by the father to a third party is taxed as a capital gain. This treatment is the same whether the third party is an individual or a corporation that is purchasing the shares.

Scen. 2 Rather than sell the shares directly to his Son, the Father could choose to have his shares redeemed by the company. This results in a deemed dividend to the father, rather than a capital gain.

Scen. 3 In the case where the Father sells the shares to his son, that son will need to extract funds from the family business in the future in order to fund the payments owing to Father. As the Son removes money from the company, this will be taxed in his hands as a dividend. This example does not take into account that the Son will need to extract additional money to allow for his personal tax liability.

Scen. 4 Previous to the July 18, 2017 proposals, in certain cases the Son could transfer the shares purchased from Father to a family holding company in exchange for debt from that company. The proposed changes to Section 84.1 will now prevent this type of planning in the future.

Exhibit 5

TOSI $73,000 Article of Impact on a Middle-class Small Business

Illustration of Possible Impact on a Small Business of July 18th, 2017 Proposed Tax Measures

Middle-class Income Example & TOSI

	Currently				*Proposed (worst case scenario)*				Tax Impact
	Company	**Spouse 1**	**Spouse 2**	**Total**	**Company**	**Spouse 1**	**Spouse 2**	**Total**	
Corporate after tax profit	$73,000			$73,000	$73,000			$73,000	$0
									$0
Non-eligible Dividend to each spouse		$36,500	$36,500	$73,000		$73,000	$0	$73,000	$0
									$0
Total Tax in Tax Prep (includes OHIP)		(641)	(641)	(1,283)		(5,050)	0	(5,050)	$3,767
									$0
After Personal Tax Funds Available		35,859	35,859	71,717		67,950	0	67,950	$3,767

How much additional dividend has to be taken from the small business in the Company to have $71,717 for living?	4,959
Additional Personal Tax	(1,192)
Total after tax	3,767

One purpose of KASB is to help our community separate 'fact' from 'fiction'; which is important given the misleading statements made by the government in the media.

In fact Mr. Morneau just restated on CTV's question period on September 10th, 2017:
"For the small business owner that is earning $73,000 or less, these tax changes aren't going to impact them at all." - **KASB disagrees and does not think this is a debatable point.**

This article examines the issue of income splitting and its impact on middle-class business owners. The government would like you to believe it will only affect high-income earners, or the 'one-percenters'. This message has been consistently repeated by Mr. Morneau and Mr. Trudeau since the legislation was released on July 18th. In short, this is simply not true and for KASB this is not a debatable point.

There are many examples where the middle-class business owner will be impacted. Here is a simple example.

Mr. Morneau said a person who earns $73,000 per year is a middle-class business owner. For this example, let's assume the following:

- The person owns an incorporated small business (Canadian Controlled Private Corporation - CCPC).
- The business has $73,000 of after-tax income available to distribute.
- The business required minimal capital to begin operations. We assume this to help simplify the example as a capital investment adds complexity based on the proposed laws.
- The owner is married and their spouse stays home with their two children.
- Both the owner and spouse are shareholders of the business.

Previously, each shareholder could receive a dividend of $36,500 from the business under existing laws supported by the Supreme Court of Canada (a.k.a. not a loophole). In order to avoid a dividend taxed at the highest rates under the proposed laws, this family will need to adjust their planning and all $73,000 will now be reported in the tax return of the owner who is active in the business and none in the spouse who is not.

This shift of income to a single family member will result in an increase of $3,800 in personal taxes for the family unit compared to existing laws. The government has narrowly point out that 'we have not increased the small business tax rate', and then misleads by saying the small business is unaffected. The first part of their statement is technically correct; the tax the business pays is unchanged. However, in our view, stating that the small business in unaffected is misleading.

The small business owner and the business are highly integrated. To understand the real impact of the proposed legislation, we must take into account the subsequent reaction by the small business owner. Any additional personal tax will require the owner to withdraw more funds from their business to fill the hole in their personal finances left by the increased personal tax bill. In this case, the owner will need to withdraw an additional $5,000 from their business to replace their lost after-tax income ($3,800) from these new rules. Thinking otherwise assumes the family did not need the income that they withdrew before, or worse for our economy, that the family will spend less in the future.

Stating that these rule changes will not impact the small business is simply not true. Any reasonable person would expect that the family will need to increase their withdrawals from the family business to counter the increased personal tax bill, just to maintain their standard of living. In most cases, this will leave the small business with less earnings or capital to invest in the future growth of that business. Therefore, threre is definitely an impact.

$5,000 may not be a significant amount to Mr. Morneau and Mr. Trudeau. However, for many small businesses, this lost cash flow could be detrimental. In the example that is presented here, $5,000 represents 7% of their after-tax business profit! Many middle-class small businesses are operating at the margin and do not have an extra $5,000 to remove from their business without making changes, including:

1. Laying off staff
2. Cutting staff hours
3. Cutting staff training
4. Reducing investment in more productive business assets
5. Reducing employee benefits
6. Increase personal borrowing (with interest rates on the rise)
7. Closing the business (because it is not worth the effort or risk)

Our example is common to many small business owners whether they earn $50,000, $73,000 or $100,000. To suggest these proposals will only impact 'one percenters' is misleading the public and business owners. We know this because we advise small businesses each day. Note this example is only one way that the proposed laws will negatively impact small businesses; there are many others.

To be clear, we can decide as a society that this increased taxation on business owners is the tax policy we want, but surely those who would be impacted should be informed? Mr. Trudeau and Mr. Morneau stating that the new tax changes only impact high-income earners is simply a incorrect and leaves middle-class business owners thinking that the tax reforms are not my concern because they do not impact me; unfortunately a nasty surprise is awaiting these hard-working Canadians and the impact may be felt by others including their employees and greater community. Before we make this tax policy decision as a society, surely we need to have an open dialogue that is two-way, and not simply a one-way street of mis-information or half truths. This is why we need to delay the legislation and have a national discussion.

Additional Information to Help You Understand the Sheer Complexity of the New Laws - The "Reasonableness" tests

Let's assume in our example the spouse that stays home does contribute some labour or capital or assumes some risks related to the business (the criteria for receiving a dividend at the lower marginal tax rates under the proposed laws), which is very typical. To pay a dividend to this spouse, you need to determine what is a 'reasonable' amount based on these variables. Therefore, the small business owner now has to either gain expertise in evaluating these factors or pay someone to do so (i.e. compliance costs increase).

They may ask their accountant to value these variables, but accountants know that valuations are a specific skill; which most accountants are not trained in. Even if the accountant provides some assistance in this regard, the accountant has no guidance on what would be considered 'reasonable' by the Canada Revenue Agency (CRA). The Department of Finance is also of no help here as they have proposed laws, but have provided little guidance on how any of these variables (labour contributed, capital contributed, risks assumed) should be valued. Of greater concern, the CRA will use their judgment to evaluate if the amount paid to the spouse, who is less active in the business, is 'reasonable'. If the CRA later decides the amount is not reasonable, they will reassess the taxpayer.

While a fair approach may be simply to transfer the disputed income back to the more active owner who could still be in a low tax bracket, this is not how the proposed rules will work. Instead, the excess amount of income will be taxed at the top tax rate instead of the more active spouse's marginal tax rate. This is the penalty for miscalculating a 'reasonable' amount, which is not well defined.

These Rules Penalize Lower Income People The Most! Not High-income Earners!

In this scenario, whom does this penalize more? Is it high income earners or middle-class Canadians? It is obviously the middle-class taxpayer that is penalized given the high income earner would already be taxed at the top tax rate and therefore be indifferent as to whether to an adjustment is made and this rule in law in general. Some very high income earners will not even care to work through the complex evaluation of variables as this does not impact them, but middle-income small business owners have no such out.
This is unbelievable when we consider the comments made by Mr. Trudeau and Mr. Morneau who consistently state we are going after high-income earners, *but these rules clearly penalize lower income individuals the most!* This simple scenario highlights how the middle-class business owner is affected by these proposals (in some cases even more-so than the 1% top income earners) and that the <u>government's position that these laws only impact high-income earners is simply untrue.</u>

Our point: This is but one of many negative impacts on middle-class small business owners from the proposed laws. For KASB, this is not a debatable point and we hope the above example helps you to understand why. What we do not understand, is why Mr. Morneau and Mr. Trudeau do not understand this point? Of if they do understand, why do they continue to mislead Canadians? Canadians that will be impacted by the proposed laws deserve to be properly informed by their government, so they are not left with a surprise when its time to file their tax returns.

Exhibit 6

Kingston Advocacy for Small Business (KASB)
Letter and Questionnaire to Department of Finance
Re: Proposed Section 246.1 of the Income Tax Act

Department of Finance

October 1, 2017

Dear Honourable Mr. William Morneau,

We are writing this letter to request clarification on the new proposed Section 246.1 of the Income Tax Act introduced on July 18, 2017. We are a group of accountants and lawyers in Kingston Ontario, many of whom assist and advise clients on tax planning and compliance matters including paying dividends from the Capital Dividend Account ("CDA"). Since the announcement date of the proposed new rules, there has been concern and confusion over the intent of this provision, and we respectfully request your assistance in providing some clarity on how the proposed rules, if enacted, will impact corporations who decide to make capital dividend elections post-July 18, 2017. The following are examples of common situations that previously allowed a corporation to pay a capital dividend to its shareholders, and we would appreciate if you would please indicate whether, generally speaking, the new Section 246.1 would likely apply to convert a capital dividend into a taxable dividend (see chart on following page):

Date CDA created:	Pre-July 18, 2017			July 18, 2017 - present		
Anticipated application of ITA Section 246.1?	Yes	No	Unsure	Yes	No	Unsure
A private corporation with CDA balance resulting from capital gains on a passive investment portfolio (public company and mutual fund shares).	☐	☐	☐	☐	☐	☐
A private corporation with a capital gain resulting from selling business assets including goodwill	☐	☐	☐	☐	☐	☐
A private corporation with a capital gain resulting from selling a residential or commercial real estate (assuming rental business is a "specified investment business")	☐	☐	☐	☐	☐	☐
A private holding corporation that sells shares of a subsidiary corporation and realizes a capital gain	☐	☐	☐	☐	☐	☐
A private holding corporation that receives a dividend from a subsidiary corporation in excess of safe income on hand and is deemed to have realized a capital gain under the provisions of 55(2)	☐	☐	☐	☐	☐	☐
A private corporation that has received a death benefit in excess of the ACB of a life insurance policy	☐	☐	☐	☐	☐	☐

If you are able to provide any additional guidance to help us to better advise our clients on the intended results of the new rules we would appreciate it.

Your truly,

Jason Skilnick, CPA, CA on behalf of
Kingston Advisory for Small Business

Exhibit 7

Summary of How Interest Income is Taxed Currently and by Company Type

(tax rates are Ontario tax rates and are rounded)

	Currently			*White Paper - One of the Options*		
	CCPC	**CCPC**	**Public Company**	**CCPC**	**CCPC**	**Public Company**
	< $500K Income	>$500K Income		< $500K Income	>$500K Income	
Corporate Level Business Income	100,000	100,000	100,000	100,000	100,000	100,000
Corporate Level Tax Rate	15%	26.50%	26.50%	15%	26.50%	26.50%
Corporate Tax Owing	(15,000)	(26,500)	(26,500)	(15,000)	(26,500)	(26,500)
After Tax Funds Retained in Company	85,000	73,500	73,500	85,000	73,500	73,500
Interest Income Earned - 5% Return	$4,250	$3,675	$3,675	$4,250	$3,675	$3,675
Corporate Tax Rate on Investment Income	50%	50%	26.5%	50%	50%	26.5%
Corporate Tax On Investment Income	($2,125)	($1,838)	($974)	($2,125)	($1,838)	($974)
Corporate Investible Funds, No Dividends Paid	**$87,125**	**$75,338**	**$76,201**	**$87,125**	**$75,338**	**$76,201**
Refundable Tax Once Dividend Paid	$1,275	$1,103	$0	**$0**	**$0**	$0
Net After Corporate Tax Funds Available to pay as a dividend	**$88,400**	**$76,440**	**$76,201**	**$87,125**	**$75,338**	**$76,201**
Personal Tax						
Tax at Top Tax Bracket	45.30%	39.34%	39.34%	45.30%	39.34%	39.34%
Personal Tax	($40,045)	($30,071)	($29,978)	($39,468)	($29,638)	($29,978)
After Personal Tax Funds Available	$48,354.80	$46,368.50	$46,223.60	$47,657.38	$45,699.73	$46,223.60
Tax at $74,000 to $84,000 Tax Bracket	19.51%	8.92%	8.92%	19.51%	8.92%	8.92%
Personal Tax	(17,247)	(6,818)	(6,797)	(16,998)	(6,720)	(6,797)
After Personal Tax Fund Available	$71,153	$69,622	$69,404	$70,127	$68,617	$69,404
Combined corporate and personal tax on investment income						
Combined Tax at Top Tax Bracket	$2,390	$1,892	$2,036	$3,088	$2,560	$2,036
Percentage of tax to investment income	56.24%	51.47%	55.41%	72.65%	69.67%	55.41%
Combined Tax at $74,000 to $84,000 Tax Bracket	$1,513	$997	$1,215	$2,540	$2,001	$1,215
Percentage of tax to investment income	35.61%	27.14%	33.06%	59.76%	54.46%	33.06%

Exhibit 8

From: David Lahey [mailto:dlahey@predictivesuccess.com]
Sent: Monday, September 11, 2017 8:27 PM
To: 'Jason Skilnick CPA CA (jskilnick@collinsblay.com)'
Cc:
Subject: Letter to protest proposed tax changes, Liberal Government

Jason,

As our CPA, I write to you and the local Kingston MP about the proposed tax changes. With the proposed changes, I would have never seen the return on my risk to jump out of a safe, employee role at Microsoft and create my own software company. Upon graduation from Queens, while I was living in Kingston I started a business that has gone on to win 3 Profit 500 National Awards. We have revenues over 7M and now employ 25 people. We recently hired new associates to create more research roles into new analytic solutions.

With the proposed tax changes, I would never have left the safe, secure world of Corporate Canada. It would just not be worth the risk. These changes have not been well developed and it is prudent to really take the time to understand the full consequences of such radical changes that enable job growth for small business across Canada. I would strongly suggest all Members of Parliament take the time to listen to the full story.

Sincerely

David Lahey, *MBA*
Founder, President
Predictive Success Corporation

The Success Centre
310 Byron St South
Whitby (Toronto) ON L1N 4P8

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Exhibit 9

	Current		Without CDA	
Capital Gain Earned in Corporation	$	10,000	$	10,000
Corporate Tax	$	(2,509)	$	(2,509)
Available for Distribution	$	7,492	$	7,492
Refundable Tax	$	1,534	$	1,534
Corporate Funds After Tax Refund	$	9,025	$	9,025
Pay Out Tax Free CDA (50% of Gain)	**$**	**(5,000)**	**$**	**-**
Balance of Funds as a Taxable Dividend	$	4,025	$	9,025
Personal tax rate on dividend (Note 1)	$	0	$	0
Personal tax on Dividend	$	(785)	$	1,761
After Personal Tax Cash	$	8,240	$	7,264
Gross Capital Gain Personally	$	10,000	$	10,000
Taxable Capital Gain	$	5,000	$	5,000
Personal tax on investment income @ 31.48% (Note 1)	$	(1,574)	$	(1,574)
After Personal Tax Cash	$	8,426	$	8,426
Additional Tax If Corporation is Used	$	(186)	$	(1,162)
		-1.86%		-11.62%

Note 1 Personal tax calculated at 2017 Ontario tax rates for an individual in the $74,313 to $84,404 bracket