

CARTERS

BARRISTERS

SOLICITORS

TRADEMARK AGENTS

IMAGINE CANADA
Charity Tax Tools Webinar

September 23, 2014

**Political Activities By Charities:
If You Do It, Do It Smart!**

By Terrance S. Carter, B.A., LL.B., TEP, Trade-mark Agent

tcarter@carters.ca

1-877-942-0001

© 2014 Carters Professional Corporation

CARTERS PROFESSIONAL CORPORATION
TOLL FREE: 1-877-942-0001

Ottawa Toronto Mississauga Orangeville
www.carters.ca www.charitylaw.ca www.antiterrorismlaw.ca

OVERVIEW

- Political Activities in Context
- Key CRA Policies, *Income Tax Act* (“ITA”) Provisions, and Resource Materials
- Political Purpose vs. Charitable Purpose
- Three Categories of Activities
- Federal Budget 2012 Changes Affecting Political Activities
- Practical Implications for Charities

A. POLITICAL ACTIVITIES IN CONTEXT

2012 - 2013

- Prior to 2012, the issue of political activities by charities did not receive much public or media attention
- However, on January 9, 2012, Joe Oliver, then Natural Resources Minister, denounced environmental and other “radical” groups because they “threaten to hijack our regulatory system to achieve their radical agenda”
- On February 9, 2012, the federal government released “Strategy on Counter Terrorism,” that equated environmentalism with white supremacy and the terrorist activities in Oklahoma City in 1995 and Norway in 2011

- On February 28, 2012, Senator Nicole Eaton initiated a Senate inquiry to study foreign funding of charities in Canada based upon her claims that such funding was improperly influencing policy discussion in Canada, presumably with regards to certain projects by the government, such as the Northern Gateway Pipeline test
- On March 29, 2012, Budget 2012 was released, expanding political activities by registered charities to include gifts to qualified donees for political purposes, required more disclosure regarding foreign funding of charities, and establishing a new political activities audit program for charities with an initial budget of \$8 million

- On May 1, 2012, Peter Kent, then Minister of the Environment, stated that some charities are used to “launder offshore funds for inappropriate use against the Canadian interest”
- Based on an analysis by Imagine Canada of 2012 T3010 returns:
 - Only 445 of registered charities out of approximately 86,000 charities reported being involved in political activities (i.e., only .52% of all charities)
 - The average reported expenditure on political activities was approximately 1.6% of total expenditures, with many reporting an expenditure of \$0
- In 2012 and 2013, a number of environmental charities came under audit by CRA

2014

- CRA clarifies its budget for political activities to be \$13.4 million for the timeframe of 2012-2016, which includes educational programs, reporting requirements, as well as audits
- A CRA review of 24,882 of approximately 86,000 registered charities in Canada, who had submitted their 2013 T3010 returns as of January 31, 2014, reported that:
 - 239 charities out of 24,882 (0.1%) filled out one or more fields in Question 2 of Schedule 7, which pertains to political activities
 - 403 files had been screened by CRA for political activities

- 31 charities were expected to receive a reminder letter about the rules of political activities
- 60 political activity audits are planned for 2012-2016
- As of May 23, 2014, CRA reported that 52 charities had actually been identified for audit, of which 32 were ongoing or already closed

- From the significant budget committed by the federal government and from other reports, it is evident that CRA is actively auditing charities involved in political activities
- Statements have been made in the media over the spring and summer of 2014 alleging that the federal government is unfairly targeting environmental, human rights, and other groups associated with the political left in Canada
- This has led to concerns of an “advocacy chill” for charities in Canada (Gareth Kirkby, master’s thesis, June 2014)

- In response, on May 23, 2014, the Director General of the Charities Directorate, Cathy Hawara, in speaking about the political audit program, stated that it is “managed in a fair and impartial manner, without political direction as to which charities should or should not be subjected to review and audit. This is critical to our role as a credible and effective regulator of the charitable sector.”
- Cathy Hawara further stated that the charities under audit currently represent all four charitable purpose categories including organizations registered to relieve poverty, advance education, advance religion, and other purposes that the law regards are charitable

- In the Charities Program Update – 2014, released on February 27, 2014, CRA advised that factors that can lead to a charity being audited for political activities include:
 - Form T3010 returns
 - Complaints or concerns from the public about the political activities of registered charities
 - Referrals from other divisions of the Directorate
 - Files transferred from within CRA's Compliance Division
 - Related files found during an audit
 - Organizations identified through the media or other publically available sources
 - Organizations identified at the time of registration as engaging in political activities

- When the Charities Directorate conducts an audit of a registered charity, the audit can result in
 - No response
 - An education letter
 - A compliance agreement, or
 - Suspension, penalties, or revocation
 - The penalty for political activity-related offences is a one-year suspension of tax-receipting privileges (see Budget 2012 below)
 - Charities that continue serious non-compliance with the rules governing political activities face possible revocation of their registered status
- The charity will have an opportunity to respond to an audit letter as well as go through an appeal process if the charity opts to do so

THE PRACTICAL CONTEXT

- It is important to remember that the 2012 *Income Tax Act* (ITA) amendments (described below) did not make significant changes to the rules permitting political activities
- As well, there have been no changes to the 2003 CRA Policy on Political Activities (CPS-022)
- As a result, it is still possible for charities to be involved in political activities as described below
- However, due to recent action by the federal government, the reality is that a charity that does become involved in political activities will become more susceptible to an audit by CRA

- The following types of charities therefore need to be informed about the rules involving political activities:
 1. Charities that are currently involved in political activities
 2. Charities that are thinking of becoming involved in political activities
 3. Charities that are not wanting to become involved in political activities but may be worried about crossing the line into political activities
- For all of these charities, it is important that they understand the applicable rules that apply and be careful in documenting their involvement in political activities in order to be ready in the event of a CRA audit

- This will become all the more important as a result of the pending 2015 federal election
- Separate and apart from the regulatory regime under the ITA regarding the type and extent of political activities that may be conducted by registered charities, charities that engage in political activities that involve lobbying also need to be aware that they may be subject to the federal (*Lobbyist Registration Act*, R.S.C. 1985) and/or various provincial lobbying statutes (e.g., Ontario's *Lobbyists Registration Act*, 1998, SO 1998, c 27)
- A discussion of lobbying legislation, though is beyond the scope of this presentation on political activities

B. KEY CRA POLICIES, INCOME TAX ACT (“ITA”) PROVISIONS, AND RESOURCE MATERIALS

All of the following CRA resources can be found at

<http://www.cra-arc.gc.ca/chrts-gvng/chrts/menu-eng.html>

- CRA Policy Commentary, Political Party’s Use of Charity Premises (CPC-007) (October 14, 1992)
- CRA Policy Statement (CPS – 022) “Political Activities” (September 2, 2003 – last modified April 23, 2014)
- Fundraising by Registered Charities (CG-013, Section G Evaluating a charity's fundraising) (April 20, 2012)
- Speech by the Director General of the Charities Directorate for the National Charity Law Symposium (May 2, 2012)

- CRA Advisory on Partisan Political Activities (March 12, 2013)
- Speech by the Director General of the Charities Directorate for the National Charity Law Symposium (May 10, 2013)
- Guide RC4409, Keeping Records (December 10, 2013)
- The Charities Directorate *Charities Program Update – 2014* (February 26, 2014)
- Guide T4033, a guide for *Completing the Registered Charity Information Return (T3010)* (May 8, 2014)

- Speech by the Director General of the Charities Directorate for the National Charity Law Symposium (May 23, 2014)
- Since 2013, CRA has created several web based resources for registered charities on political activity and allowable limits under the ITA, as well as the common law rules, including:
 - A political activities self-assessment tool
 - A political activities video series
 - A political activities recorded webinar

- Information briefs on the following
 - Compliance and reporting requirements
 - Political activities rules
 - Partisan political activities
 - Distinguishing between charitable and political activities
 - Representatives of a charity involved in political activities on their own time
 - Accountability for the use of resources for political activities
 - Representations to government as a charitable activity
 - Questions and answers about political activities

- Resources from www.carters.ca:
 - Charities Speaking Out: The Evolution of Advocacy and Political Activities by Charities in Canada
(<http://www.carters.ca/pub/article/charity/2010/tsc1029.pdf>)
 - Charity Law Bulletin No. 206 - The Parameters of Political Activities for Registered Charities
(<http://www.carters.ca/pub/bulletin/charity/2010/chylb206.pdf>)
 - Charity Law Bulletin No. 280 - 2012 Federal Budget: Including New Rules and Sanctions for Charities Conducting Political Activities
(<http://www.carters.ca/pub/bulletin/charity/2012/chylb280.htm>)

- Anti-terrorism & Charity Law Alert No. 31 -
Canada's Counter-Terrorism Strategy Singles Out
Environmentalism
[\(<http://www.carters.ca/pub/alert/ATCLA/ATCLA31.pdf>\)](http://www.carters.ca/pub/alert/ATCLA/ATCLA31.pdf)
- Charity Law Bulletin No. 286 - Playing by the
Rules:
Political Activities Fair Game for Charities
[\(<http://www.carters.ca/pub/bulletin/charity/2012/chylb286.htm>\)](http://www.carters.ca/pub/bulletin/charity/2012/chylb286.htm)
- Charity Law Bulletin no. 305 - CRA Releases New
T3010(13)
[\(<http://www.carters.ca/pub/bulletin/charity/2013/chylb305.htm>\)](http://www.carters.ca/pub/bulletin/charity/2013/chylb305.htm)

C. POLITICAL PURPOSE vs. CHARITABLE PURPOSE

- All registered charities are required by law to have exclusively charitable purposes (relief of poverty, advancement of education, advancement of religion and other purposes beneficial to the community)
- An organization established for a political purpose does not meet the definition of what a charity is at common law
 - Contrasting case law in other jurisdictions is emerging however, see *Re Greenpeace of New Zealand Incorporated* ([2014] NZSC 105) and *The Human Dignity Trust v The Charity Commission for England and Wales* ([2014] CA/2013/0013)

- The courts have determined political purposes to be those that seek to:
 - Further the interest of a political party or support a political party or candidate for public office, or
 - Retain, oppose, or change the law, policy, or decision of any level of government in Canada as well as/or any foreign country

- To determine whether a charity is constituted exclusively for charitable purposes, CRA will look at:
 - The stated purpose of an organization
 - The organization's current activities to determine whether it has adopted political purposes
- A political purpose that is not in a charity's governing document but that the charity still pursues can become an "unstated collateral political purpose", which is not acceptable to CRA

D. THREE CATEGORIES OF ACTIVITIES

- Activities undertaken by a registered charity can be separated into three categories:
 - a) Charitable activities (permitted without limits)
 - b) Political activities (permitted up to prescribed limits)
 - c) Prohibited activities (never permitted)

1. Charitable Activities (permitted without limits)

- A charitable activity is an activity undertaken to achieve a charitable purpose
- If an activity is considered by CRA to be charitable, then it is permitted without limits
- The CRA policy provides that communication with the public or a public official is a charitable activity in the following circumstances:

- Public awareness campaign about the work of a charity or an issue related to that work, so long as the activity is connected and subordinate to the charity's purpose and is well reasoned
- Communicating with an elected representative or public official (with or without an invitation), even if the charity advocates that the law, policy or decision of any level of government in Canada or abroad be retained, opposed, or changed, provided that such activity is subordinate to the charity's purpose and all representations should:
 - Relate to an issue that is connected to the charity's purpose
 - Be well reasoned
 - Not contain information that is false, inaccurate or misleading

- Releasing the text of a representation before or after delivering it to the elected representative or public official, provided that the entire text is released and there is no explicit “call to political action”
- “Call to political action” means encouraging the public to contact an elected representative or public official to urge them to retain, oppose, or change a law, policy or decision

- Other examples of charitable activities given in the CRA Policy Statement (CPS-022)
 - Distributing the charity's research, including distributing it to all election candidates
 - Publishing a research report
 - Presenting a research report to a Parliamentary Committee
 - Giving an interview about the research report
 - Distributing a research report to all Members of Parliament
 - Participating in an international policy development working group
 - Joining a government advisory panel to discuss policy changes

2. Political Activities (permitted up to prescribed limits)

a) What Is a Political Activity?

- The ITA does not contain a definition of “political activity”
- According to Policy Statement CPS-022, an activity is presumed to be a political activity if a charity:
 - Explicitly communicates a call to political action (i.e. encourages the public to contact elected representatives or a public official and urges them to retain, oppose, or change the law, policy, or a decision of a government)
 - Explicitly communicates to the public that the law, policy or decision of any level of government in Canada or a foreign country should be retained, opposed or changed, or

- Explicitly indicates in its material that the intention of the activity is to incite, organize or put pressure on government to retain, oppose or change the law, policy or decision of any level of government in Canada or another country
- Make a gift to another qualified donee intended for a political purpose (see below)
- A charity may engage in political activities provided that:
 - The activities are non-partisan (as discussed below)
 - The issue in question is connected (ancillary) to the charity's purposes
 - The activities are subordinate (incidental) to the charity's purposes

- The charity's views are based on a well reasoned position
- The activities fall within expenditure limits under the ITA (described below)
- “Subordinate” means a minor focus of the charity
 - Need to consider it in relation to the charity's entire program of activity
 - If it becomes the main way of furthering the charity purposes, it may have become an end or unstated purpose of the charity
- “Connected” and “Subordinate” flows from subsection 149.1(6.2) of the ITA, which provides that political activities must be ancillary and incidental to the charitable activities of the charity

- Examples given in the CRA Policy Statement of permitted political activities that are connected to the charity's purposes:
 - Buying a newspaper advertisement to pressure the government concerning a law
 - Organizing a march or a rally on Parliament Hill
 - Organizing a conference in support of the charity's opinion on a given matter
 - Hiring a communications specialist to arrange a media campaign
 - Using a mail campaign to urge supporters to contact the government

b) Limits on Expenditures on Permitted Political Activities

- Where a charity takes part in political activities, it must devote “substantially all” of its “resources” to charitable activities
- “Resources” is not defined in the ITA but administratively CRA considers “resources” to include
 - The total of a charity’s financial assets, including moneys and other investments
 - Physical resources (e.g. land, buildings, office, equipment and supplies)
 - Human resources (e.g. staff, volunteers, and directors)
 - Donated resources

- “Substantially all” usually means 90% or more
 - Therefore, subject to certain exceptions described below, a charity that devotes no more than 10% of its total “resources” in a year to political activities will be operating within the “substantially all” requirement
 - Conversely, a charity that devotes more than the allowable limit may be considered by CRA to be operating to achieve a political objective

- CRA's administrative discretion concerning the limits on expenditures on political activities has been extended in certain situations (e.g. smaller charities) by its Policy Statement:
 - A charity with annual income of less than \$50,000 (previous year) can devote up to 20% of resources in a given year
 - A charity with annual income of between \$50,000 and \$100,000 (previous year) can devote up to 15% of resources in a given year
 - A charity with annual income of between \$100,000 and \$200,000 (previous year) can devote up to 12% of resources in a given year

- Issues involving “resources” that remain unclear:
 - When to calculate the “resource” limit?
 - Presumably at the fiscal year end of the charity
 - How to calculate the “resource” limit?
 - Presumably on a global basis, averaging all types of “resources”, but it is not clear what this would involve
 - How to track volunteer and donated “resources”?
 - Calculate the percentage of volunteer hours or number of volunteers, as well as the percentage or amount of donated resources devoted to carrying out the charity’s political activities
 - The onus is always on the charity to account for use of its resources

- In limited circumstances, expenditures on political activities may be permitted by CRA to be averaged over a number of years (e.g. “infrequent, short-term, one-of-a-kind political activities”)
 - CRA will look to see if there were unique one-time conditions that led the charity to overspend on political activities in one year
 - If so, CRA might allow the charity to use the unclaimed portion of resources that it did not spend on political activities from two preceding years
- Resources used towards permitted political activities do not count toward meeting a charity’s disbursement quota (i.e. 3.5% D.Q.), including gifts to a qualified donee to support its political activities

- A charity that is involved in political activities will need to keep careful books and records in order to demonstrate that substantially all of its resources have been devoted to charitable activities in order to be prepared for a CRA audit
 - Where an expenditure relates to both political and charitable activities, a reasonable allocation can be made
 - Where substantially all (90%) or more of the activity is charitable or conversely political, then the whole expenditure can be considered charitable or political as applicable, except gifts to qualified donees
 - See CRA's Guidance on Fundraising (CG-013) on how to allocate expenditures
- However, the onus is on the charity to explain and justify its reasonable allocation

3. Prohibited Activities (never permitted)

- Prohibited activities are activities that are either illegal (i.e., terrorism or activities contrary to public policy) or involve “partisan political activities” and are not permitted at all
- According to subsections 149.1(6.1) and (6.2) of the ITA, and the CRA Advisory on Partisan Political Activities, “partisan political activity” involves the “direct or indirect support of, or opposition to, any political party or candidate for public office”
- When a political party or candidate for public office supports a policy that is also supported by a charity, the charity may promote this policy but it cannot directly or indirectly support the political party or candidate for public office

- Need to be careful, as CRA may equate naming a politician with a “political party”
- Examples of prohibited partisan political activity:
 - A gift of charity funds to a political party that supports the charity’s views on a given matter
 - Inviting an MP who is a member of a church and who is running for re-election to speak at a church without giving an equal opportunity to all other candidates seeking election for the same office
 - Single out the voting pattern on an issue of any one elected representative or political party
- Other examples of prohibited partisan activities in the CRA Advisory include the following:
 - Making public statements (written or oral) that endorse or denounce a candidate or political party

- Support an election candidate in a newsletter
- Hosting an all candidates meeting or public forum in a partisan manner
- Inviting candidates to speak at different dates or events so as to favour a candidate or political party
- Publishing the voting records of selected candidates or parties on an issue
- Posting signs in support of, or in opposition to, a particular candidate or political party
- Distributing literature or voter guides that promote or oppose a candidate or political party explicitly or by implication
- Explicitly connects its position on an issue to the position taken on the same issue by a candidate or political party

- Examples of activities in the CRA Advisory that would be permissible during an election
 - Employees, members and leaders of a charity may assist any candidate or political party in their personal capacity
 - They should not, however, make partisan comments in speeches at charity functions or in charity publications; and in other situations, are encouraged to indicate that their comments do not represent the views of the charity
 - Posting information on a charity's website about candidates and political parties is allowable, provided that:

- It is connected and subordinate to the charity's purpose
 - It reflects the position taken with regard to all political parties or candidates
 - No political party or candidate is singled out favourably or unfavourably
 - There is no explicit direction to support or oppose a political party or candidate
- Charging fair market value rent to a political party for occasional meetings held at a charity's facilities is permitted so long as equal access and opportunity is given to all political parties

- However, this remains a grey area, as prolonged association with one party may lead to conclusion the charity favours that party, thereby constituting a prohibited political activity – analysis is fact specific (CRA Policy Commentary, *Political party's use of Charity's premises*, CPC -007, available online at <http://www.cra-arc.gc.ca/chrts-gvng/chrts/plcy/cpc/cpc-007-eng.html>)
- The CRA Advisory reminds charities that “during election campaigns the CRA steps up monitoring of activities of registered charities and will take appropriate measures if a registered charity undertakes partisan political activities...Charities engaging in partisan political activities risk being deregistered”

E. 2012 AMENDMENTS AFFECTING POLITICAL ACTIVITIES

- Budget 2012 was introduced on March 29, 2012, online at <http://www.budget.gc.ca/2012/plan/toc-tdm-eng.html>
- The Act that implemented the measures of Budget 2012, the *Jobs, Growth and Long-term Prosperity Act* (SC 2012, c 19) received Royal Assent June 29, 2012 http://laws-lois.justice.gc.ca/eng/annualstatutes/2012_19/
- 2012 amendments impacted registered charities and registered Canadian amateur athletic associations (RCAAAs) with regard to political activities in three ways:

- First, the 2012 amendments expanded the definition of political activities to include certain gifts by charities to qualified donees (which includes registered charities)
 - Specifically, the amendments expanded the definition of “political activities” under subsection 149.1(1), to “include the making of a gift to a qualified donee if it can reasonably be considered that a purpose of the gift is to support the political activities of the qualified donee” (“QDs”)
 - The focus is on the intent of the donor charity, not the intent of the recipient QD
 - This change results in a double count of political activities, once by the donor charity and once by the recipient QD when it is expended on political activities

- Three possible scenarios in determining “can reasonably be considered”:
 - Written designation to use the gift for the political activities of the QD
 - Written designation to not use the gift for the political activities of the QD
 - No written designation, then look at other circumstances to see if there was “a purpose”
- Likely best to avoid multi-purpose gifts, because the legislation simply refers to “a purpose,” so any political purpose for any part of the gift might taint the whole gift

- Charities that are caught by the new inclusion rules will have to track and report political activities the same way as charities directly involved in doing political activities
- As a result, funding charities that do not want to have to track political activities in their T3010 should designate in writing those gifts that are not to be used for political activities by the recipient QD
- Although a charity is responsible for reporting gifts to QDs, it is not responsible for tracking the recipient's use of the gift
- Form T1236, *Qualified Donees Worksheet / Amounts Provided to Other Organizations*, provides for reporting of specific gifts to qualified donees for their political activities

- Second, the 2012 amendments introduced new intermediate sanctions :
 - Where a registered charity exceeds the limits in the ITA for political contributions (generally 10% of its total resources a year), CRA can impose a one year suspension of tax receipting privileges (in addition to revocation)
 - Where a registered charity fails to report any information that is required to be included on a T3010 annual return (not just political activities), CRA can suspend its tax receipting privileges until CRA notifies the charity that it has received the required information

- This second sanction emphasizes the importance of having the board, as well as having legal and accounting professionals review and approve the T3010 annual return before filing it with CRA
- A total of \$13.4 million was committed to enforcement and education by CRA from 2012-2016, including funding for educational programs, reporting requirements, as well as audits

- Third, the 2012 amendments state there “will be more disclosure required concerning political activities”
 - CRA has amended Guide T4033, a guide for *Completing the Registered Charity Information Return*
 - The expanded definition of “political activity” and the increased reporting requirements for political activities are now found in section C5 of the new T3010, as well as the new Schedule 7, *Political Activities*
 - Note that the “total amount spent” on political activities in question C5 of the T3010 does not equate to “resources”

- In the new Schedule 7, charities now need to
 - Describe the political activity that a charity has devoted resources to, including gifts made to qualified donees intended for political activities
 - Explain the relationship between such political activities and its charitable purpose
 - Disclose how it has conducted its political activities (i.e., on media ads, conferences, demonstrations, publications, petitions, and the internet) including gifts to qualified donees

- Charities need to further indicate the amount received from foreign sources directed for political activities, specifically:
 - The amount that it received directed for political purpose
 - The nature of the political activity
 - The country of origin of the donor (using the existing country codes in the T3010)
- However, there is no need to identify the name of the foreign donor unless the donor gives \$10,000 or more, in which event the donor's name need to be disclosed in Schedule 4 of the T3010 as part of “Confidential Data”

F. PRACTICAL IMPLICATIONS FOR CHARITIES

- Must know the rules before becoming involved in political activities or avoiding political activities
- Ensure that activities are either “charitable activities” or are “permitted political activities”
- Avoid any prohibited partisan political activities, including naming a particular politician
- The decision to become involved in permitted political activities needs to be authorized by the board of directors of the charity given the risks involved
- Gifts to QDs should generally include a written designation which states that the gift should not be used for the political activities of the recipient QD

- Ensure that any permitted political activities undertaken fall within expenditure limit (i.e., generally within the 10% resource limit)
- It is essential to keep careful books and records and do appropriate allocations of all expenditures with respect to permitted political activities
 - This includes, but is not limited to, invoices, ledgers, records of volunteer hours worked, contracts, and minutes of board meetings.
 - The onus is on the charity to prove that it has operated within the rules regarding political activities
 - For information about what records a charity needs to keep, and for how long, see [Guide RC4409, Keeping Records](#)

- Have the board of directors, as well as accounting and legal professionals, review and approve the T3010 prior to filing, due to the imposition of new intermediate sanctions and greater public scrutiny
- Finally, develop a policy to outline clear and explicit guidelines regarding use of the charity resources for political activities
 - Include, for instance, clear guidelines to distinguish between the personal political actions of representatives of the charity and the permitted political activities of the charity itself
- The bottom line is: regulation of political activities is only getting more complex and riskier, *so if you do it, do it smart!*

CARTERS

BARRISTERS

SOLICITORS

TRADEMARK AGENTS

Disclaimer

This powerpoint handout is provided as an information service by Carters Professional Corporation. It is current only as of the date of the handout and does not reflect subsequent changes in the law. This handout is distributed with the understanding that it does not constitute legal advice or establish a solicitor/client relationship by way of any information contained herein. The contents are intended for general information purposes only and under no circumstances can be relied upon for legal decision-making. Readers are advised to consult with a qualified lawyer and obtain a written opinion concerning the specifics of their particular situation.

© 2014 Carters Professional Corporation

CARTERS PROFESSIONAL CORPORATION
TOLL FREE: 1-877-942-0001

Ottawa Toronto Mississauga Orangeville
www.carters.ca www.charitylaw.ca www.antiterrorismlaw.ca