
HOSPITALS AND FOUNDATIONS SEMINAR SERIES

**Healthcare Philanthropy:
Check-Up 2008**

Toronto – May 28, 2008

**Recent Update in Charity Law:
The Year In Review**

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

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A. INTRODUCTION

- This presentation provides brief highlights of the following:
 - Recent Changes and Rulings Under the *Income Tax Act* (“ITA”)
 - New Policies and Publications From the Charities Directorate of the Canada Revenue Agency
 - Other Recent Federal and Provincial Issues Affecting Charities
 - Recent Case Law Affecting Charities

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B. RECENT CHANGES AND RULINGS UNDER THE *INCOME TAX ACT* (“ITA”)

1. October 2007, Bill C-10 - Proposed Amendments to the *Income Tax Act* Affecting Charities
 - On October 29, 2007, Bill C-10 was introduced to address a lengthy list of proposed amendments to the ITA
 - Bill C-10 amends and consolidates earlier proposed amendments released on December 20, 2002, December 5, 2003, February 27, 2004, July 18, 2005 and November 18, 2006
 - Bill C-10 is expected to be passed in 2008

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- Some of the more significant changes proposed by Bill C-10 involve the introduction of
 - Split-receipting rules
 - Provisions which curtail abusive donation tax shelter schemes
 - New definitions for charitable organizations and public foundations
- The provisions contained in Bill C-10 are, for the most part, the same as the amendments released in July 2005, with a few exceptions
 - Withdrawal of reasonable inquiry requirement for gifts over \$5,000

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- Inter-Charity Gifts
 - Split-receipting rules will not apply to inter-charity transfers, so common law will continue to apply
 - As such, where there is a gift of property involving a debt, (such as a home subject to a mortgage), careful considerations needs to be given to the calculation of the disbursement quota
- Non-Application of Deemed Fair Market Value Provisions
 - The deeming provisions will not apply where the donor has acquired property from a transferor (such as a spouse) on a tax-deferred rollover basis

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- Although Bill C-10 has not been enacted, CRA has begun reviewing applications for charitable status and re-designation by using the new proposed definitions for charitable organization and public foundation
 - The new definition replaces the “contribution test” with a “control test”
 - Charities that do not meet this test will be designated as private foundations

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2. 2007 Federal Budget Passed as Bill C-28

- **The March 19, 2007 Budget (“2007 Budget”) introduced a number of measures which will have a substantial impact on charities**
- **The 2007 Budget’s legislative initiatives were contained in Bill C-28, which received Royal Assent on December 14, 2007, subject to certain amendments in the February 26, 2008 Budget**

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- **Extension of Capital Gains Exemption to Private Foundations**
 - **The March 2007 Budget eliminates the taxation of capital gains on donations of publicly-listed securities to private foundations**
 - **This also applies to donations of publicly listed securities by an arms length employee who acquired the security under an option granted by the employer**

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- **Excess Business Holdings Rules**
 - **The government was concerned that persons connected with a private foundation, by virtue of the combined shareholdings between them and the foundation’s, have influence that they may use for their own benefit**
 - **The new excess business holdings rules will require a private foundation to monitor its holdings of both publicly-listed and private corporation shares**

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– #1 Insignificant Interest (2% or less)

- A private foundation is permitted to hold a maximum of 2% of all outstanding shares in a particular class in any one corporation

– #2 Disclosure Requirements (over 2%)

- If a private foundation’s holdings of one or more classes of shares of a company exceeds 2% of all outstanding shares, the private foundation will be required to disclose in its T3010 the name of the corporation, the foundation's holdings of that class of shares, and the total shareholdings of the “relevant persons” of that class of shares

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- A “relevant person” is generally a person who does not deal at arms length with any person who controls the private foundation, or with any member of a non arm’s length group of persons that control the foundation, with certain exemptions, such as an “estranged family member”
- The private foundation will also be required to report to CRA any “material transactions” during the year by the foundation or relevant persons for any period during which the foundation was outside the safe harbour in respect of the corporation

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- A material transaction involves the acquisition or disposition of more than \$100,000 worth of shares of a particular class or more than 0.5% of all outstanding shares of that class

– #3 Divestment Requirements (over 20%)

- If a private foundation is outside the safe harbour range and the foundation and its relevant persons together hold more than 20% of the outstanding shares of a particular class of shares of a corporation, a divestment will be required
- Penalties will be imposed if the divestment does not occur within the time periods specified by the rules

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- **The compliance period for divestiture of excess shares depends on the manner by which the excess arose:**
 - **If the excess shares were acquired by the foundation for consideration, divestiture of the excess is required before the end of that taxation year**
 - **If the excess shares were acquired by a relevant person or by a donation to the foundation by a relevant person, divestiture of the excess is required before the end of the subsequent taxation year**

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- **If the excess shares were acquired as a result of a donation from a person who is not a relevant person or the result of the redemption, acquisition or cancellation of the shares by the corporation, divestiture of the excess would be required before the end of the 2nd subsequent taxation year**
- **If the excess shares were acquired by way of a bequest, divestiture of the excess would be required before the end of the 5th subsequent taxation year**

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– Exemptions

- **No obligation to divest will be imposed on donations of shares made before March 19, 2007, that were made subject to a trust or direction that the shares be retained by the foundation, if the terms prevent the foundation from disposing of those shares**
- **The same exemption applies to donations made on or after March 19, 2007 and before March 19, 2012 pursuant to the terms of a will signed or an *inter vivos* trust settled before March 19, 2007 and not amended after that date**

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– **Penalty**

- **A penalty will apply in respect of a foundation’s excess business holdings that have not been divested as required**
- **The proposed penalty is 5% of the value of excess holdings, increasing to 10% if a second infraction occurs within 5 years**
- **A penalty tax of 10% if it fails to comply with the disclosure requirements**

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– **Transition**

- **Private foundations may divest, over a period of 5 to 20 years, excess business holdings existing as of March 18, 2007 at a rate of 20% every 5 years until the excess is eliminated**

3. 2008 Federal Budget

- **The February 26, 2008 Federal Budget (“2008 Budget”) proposes a number of measures which will impact registered charities and their donors, but legislation on this part of the Budget has not been released yet**

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- **Finance proposes to extend the exemption to donations of unlisted securities that are exchanged for publicly traded securities before being gifted to a registered charity on or after February 26, 2008, within 30 days of the exchange**
- **Finance proposes to amend the excess business holding rules that were enacted in December 2008, by**
 - **Exempting certain unlisted shares that were held on March 18, 2007 from the divestiture requirements, subject to certain exceptions**

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- New rules with respect to shares held on March 18, 2007 by “non arm’s-length” trusts considered to be “relevant persons” of a private foundation
- Introducing concept of “substituted shares”
 - Generally “substituted shares” are shares acquired by a person in the context of a corporate reorganization in exchange for other shares
 - “Substituted shares” will be treated the same as the shares for which they were exchanged for purposes of applying the exemption from the excess business holding rules

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- Extending anti-avoidance provisions to address certain inappropriate uses of trusts
4. CRA Ruling on Flow-through Shares
- CRA released an advance income tax ruling on February 6, 2008
 - CRA approved a form of flow-through share gifting strategy, indicating that the arrangement would constitute a “gifting arrangement” and a tax shelter pursuant to subsection 237.1(1) of the ITA
 - See presentation on Donation Tax Shelters and Flow-Through Shares by Theresa Man for more details

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- C. NEW POLICIES AND PUBLICATIONS FROM CHARITIES DIRECTORATE OF THE CANADA REVENUE AGENCY (“CRA”)
1. CRA Warning to Charities on Tax Shelter Gifting Arrangements
- Throughout 2007 and 2008, CRA issued a number of warnings to charities and donors:
 - June 4, 2007
 - August 13, 2007
 - Winter 2008 Registered Charities Newsletter No. 29

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- These warnings cautioned that:
 - CRA intends to challenge and proceed with compliance actions against tax shelter gifting arrangements that do not comply with the ITA
 - CRA intends to audit all such arrangements and re-assess donors involved
 - New arrangements are being marketed that claim to be different from those for which the CRA has previously issued warnings, but in fact are not
- CRA recommends that persons considering participating in tax shelter donation arrangements obtain independent legal and tax advice

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- Recently, CRA investigated the donation tax shelter, Banyan Tree Foundation Gift Program, and is in the process of disallowing donation tax receipts claimed by donors for the period between 2003 to 2007
- A group of donors who participated in Banyan Tree has decided to look to the promoters of Banyan Tree to recover any losses they may suffer as a result of the CRA reassessments and has launched a class action law suit
- See presentation on Donation Tax Shelters and Flow-Through Shares by Theresa Man for more details

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2. Application of New Intermediate Sanction by CRA - Notice of Suspension & Intention to Revoke
- On November 29, 2007, CRA announced that it had issued a Notice of Suspension to International Charity Association Network (ICAN), which was involved with tax shelter arrangements
 - The one-year suspension of charitable status was imposed upon ICAN for “contravention of ... the [ITA] ... by failing to maintain and/or provide, and failing to provide access to, books and records relating to its involvement with tax shelter arrangements” (subsection 188.2(2) of ITA)
 - This suspension was the first sanction of this sort imposed by CRA since the introduction of the intermediate sanctions

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- ICAN failed to provide required documentation to the CRA to support payments and expenditures including \$26,372,685 in fundraising payments and \$244,323,422 in charitable program expenditures
- On December 3, 2007, CRA issued a Notice of Intention to Revoke ICAN's charitable status
- ICAN filed a Notice of Objection with respect to CRA's decision to revoke, and filed a motion to defer the period for publication of the Notice of Revocation until the disposition of its notice of objection and any subsequent appeal
- The Federal Court of Appeal ("FCA") dismissed ICAN's motion seeking deferment on April 2, 2008

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3. Application of New Intermediate Sanction by CRA – Revocation of Charitable Status
- On March 5, 2008, CRA revoked the charitable status of the Francis Jude Wilson Foundation
 - The Foundation was apparently involved in a donation tax shelter arrangement resulting in the Foundation receiving actual cash returns of only \$23,716 in fiscal 2005 and \$81,951 in fiscal 2006 while issuing receipts totaling \$10,560,650
 - This case is a reminder that CRA is reviewing all tax shelter-related donation arrangements and that it plans to audit every participating charity, promoter and investor

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4. Application of New Intermediate Sanction by CRA - Notice of Suspension
- On March 12, 2008, CRA suspended the tax receipting privileges of the Adath Israel Poale Zedek Anshei Ozeroff synagogue ("Adath Israel") in Montreal for one year and imposed a monetary penalty of \$499,055
 - The suspension arose as a result of CRA's allegations that Adath Israel issued improper tax receipts in relation to the sale of cemetery plots and child nursery expenses
 - Adath Israel offered \$10,000 plots to its congregants for \$3,750, provided that they pay an annual membership fee. The fees were treated like donations and members received receipts for tax purposes

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- CRA stated that the privileges conveyed by membership, namely purchasing plots in the synagogue cemetery clearly constituted a benefit
- Adath Israel also issued tax receipts to parents for fees they paid to have their children attend a synagogue-run nursery
- It is not clear whether the CRA will now audit every Adath Israel member who bought a plot
- There is no indication from CRA with respect to whether or not it will immediately seek revocation of Adath Israel's charitable status, as it has done in the case of ICAN discussed earlier

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5. CRA Publishes Proposed Guidelines for Research as a Charitable Activity
- On January 9, 2008, CRA published the draft policy *Consultation on Proposed Guidelines for Research as a Charitable Activity*. Within the Guidelines, the CRA sets out its proposed policy pertaining to “the legal and administrative requirements a registered charity is expected to fulfil in order to conduct or fund research as a charitable activity”
 - The CRA generally defines research, for charitable purposes, as “the systematic investigation into and study of materials and sources on any non-frivolous subject to discover or improve knowledge

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- To be considered charitable, the research must be disseminated and made freely available to others who might want access to it, as opposed to being used for private or commercial purposes
- The mere accumulation and production of information on a given subject or about a specific event, or the gathering of market research about consumers' needs and preferences, will not, in and of itself, be considered to be a charitable research activity

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6. New CRA Guide on Charitable Work and Ethnocultural Groups

- On January 29, 2008, CRA released a new Guide to help ethnocultural organizations that want to apply for charitable status
- The Guide also provides some guidance on the “advancement of religion” head of charity
 - The Guide reiterates that “it is a charitable purpose for an organization to teach the religious tenets, doctrines, practices, or culture associated with a specific faith or religion” but adds that “the religious beliefs or practices must not be subversive or immoral”

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- “[T]eaching ethics or morals is not enough to qualify as a charity in the advancement-of-religion category”
- “There has to be a spiritual element to the teachings and the religious activities have to serve the public good”
- A group’s social events or cultural celebrations, such as “banquets, picnics, and Canada Day celebrations”, are not considered charitable purposes by the CRA

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7. New Checklists for Charities

- On March 26, 2008, CRA released a number of new checklists:
 - Basic Guidelines Checklist
 - Activities Checklist
 - Books and Records Checklist
 - Receipting Checklist
 - Spending Requirement Checklist,
 - Receipting Checklist
 - T3010 Checklist
 - Legal Status Checklist
 - Change Checklist

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8. CRA Releases a Consultation Paper for a Proposed Policy on Fundraising by Registered Charities

- On March 31, 2008, CRA released a Consultation Paper for a Proposed Policy on Fundraising (“Fundraising Policy”) to provide registered charities with information pertaining to the use of resources for fundraising and the limits imposed by law
- Consultation open until July 30, 2008 for comments
- For additional information, see M. Elena Hoffstein’s presentation “Completing the T3010 - Tips and Traps”

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9. CRA Policy Statement on Promotion of Volunteerism

- In early May 2008, CRA released a policy statement and summary policy in relation to organizations established to promote volunteerism in the community-at-large through broad-based activities
- To be registered under this policy, the applicant has to satisfy the following criteria:
 - Its formal purposes must clearly state that it is promoting volunteerism generally for the benefit of the community-at-large
 - It must accomplish its purpose through broad-based activities, which may or may not be set out in the objects, but must not be limited merely to fundraising

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- The applicant has to clearly promote volunteerism to the community-at-large as opposed to supporting only one organization or one particular type of organization that reflects a single interest, unless the beneficiaries are registered charities
- The applicant can provide services only to qualified donees and non-profit organizations as described in paragraph 149(1)(l) of the ITA
- If the applicant funds any organizations, they must be qualified donees

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10. CRA Policy Statement on Umbrella and Title Holding Organizations

- In early May 2008, CRA released a policy statement and summary policy in relation to umbrella organizations and title holding organizations
- Umbrella organizations are described as organizations that support the charitable sector by promoting the efficiency and/or effectiveness of registered charities, or that advance a charitable purpose by working with and through member groups
- Title holding organizations can also be charitable if they are holding property for a registered charity or other qualified donee

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11. CRA Releases a Consultation Paper for Proposed Guidelines for Sport and Charitable Registration

- On May 9, 2008, CRA released a consultation draft policy intended to clarify the ways in which organizations carrying out activities that include sport can potentially qualify for charitable registration
- Although the promotion of sport is not recognized as charitable, there are circumstances in which sports activities can be used to further a charitable purpose
- To qualify for registration, all of the purposes of the applicant organization must be both charitable and for the benefit of the public

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- For such an organization to be registered, the sport activities it pursues should:
 - Relate to and support its wholly charitable purpose(s) and be a reasonable way to achieve them, or
 - Be incidental in nature
- Whether or not a sports activity will be acceptable will depend on the facts of each case and the charitable purpose the activity is intended to further

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12. CRA Releases Model Objects

- On May 21, 2008, CRA released a non-exhaustive list of model objects that would be acceptable to the CRA in order to assist organizations that wish to apply for charitable status or registered charities that want to amend one or more of their purposes
- CRA indicates that it will likely only need to consider whether:
 - The organization will deliver a public benefit
 - The proposed activities are charitable, will be carried out in a manner allowed by the Act, and will further one of its charitable objects
 - The organization is appropriately set up

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13. CRA Revises Policy Regarding Valuation of Gifts of Life Insurance

- Par.3, IT-244R3 – *Gift by Individuals of Life Insurance Policies as Charitable Donations* is no longer correct i.e. cash surrender value less outstanding policy loans
- CRA Technical Interpretation (#2008-026709) issued on February 25, 2008 indicates that the factors listed in paragraphs 40 and 41 of *Information Circular 89-3* should now be taken into consideration when determining the fair market value of a gift of life insurance

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D. OTHER RECENT FEDERAL AND PROVINCIAL ISSUES AFFECTING CHARITIES

1. First Charge Laid Under Canada’s Anti-Terrorism Financing Regime

- On March 14, 2008, the first formal charges under Canada’s sweeping anti-terrorism financing regime were laid
- The accused was charged with committing an offence under s. 83.03(b) of the *Criminal Code* which makes it an offence to provide, or make available property or services for terrorist purposes
- It is alleged that the accused solicited donations for a humanitarian organization that the police claim is the Canadian front organization for a “listed entity”, i.e. the Tamil Tigers

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2. **Telemarketing and the National Do Not Call List**

- **On July 3, 2007 the Canadian Radio-Television and Telecommunication Commission (CRTC) released telecom decision CRTC #2007-48**
- **This decision established a National Do Not Call List (“NDNC”) but registered charities have been exempted from the rules and guidelines of the NDNC list**
- **However, with respect to individual Do Not Call lists, registered charities must continue to maintain their own lists and honour consumer requests not to be called**

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- **This decision also removed a requirement, originating in a 2004 decision, that a toll free number manned during business hours must always be provided to the consumer at the beginning of a call**
 - **However, a contact number must still be provided when requested**
 - **The number must be local or toll free**
 - **The number must be answered by an individual or voicemail and returned in three business days**

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- **On December 21, 2007, the CRTC named Bell Canada as the NDNC list operator to manage the filing of complaints while the CRTC maintains the roles of investigator and issuer of notices of violation and monetary penalties**
- **On January 28, 2008 the CRTC announced that, “[a]ll telemarketers, including those making exempt calls, will pay fees to the investigator to cover its costs ...”**
- **Charities, although exempt from the rules of the NDNC list, will be required pay levies to help finance its NDNC list activities**
- **The fee amount has not yet been determined**
- **CRTC expects to launch the NDNC list by September 2008**

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E. RECENT CASE LAW AFFECTING CHARITIES

Meaning of Charity

1. Provincial Amateur Sport Organizations Precluded from Attaining Charitable Status

- **On May 16, 2007, the Supreme Court of Canada (“SCC”) heard an appeal from the FCA, in *A.Y.S.A. Amateur Youth Soccer Association v. Canada Revenue Agency* (“AYSA”), with respect to the refusal to register the appellant as a charitable organization**

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- **The purposes of the organization were to promote amateur youth soccer and offer youths the opportunity to develop pride in their ability and soccer skills**
- **The appellant argued that since the common law in Ontario recognizes the promotion of amateur sport as a charitable purpose and the proposed activities are confined to Ontario, the law of Ontario should apply to the determination of its charitable status**
- **The SCC released its decision on October 5, 2007**

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- **The SCC held that just because AYSA, and other sports organizations do not qualify as a RCAA, does not automatically preclude them from being found to be a charity at common law**
- **The RCAA regime in the ITA is not a complete code for amateur sporting activities, and its provisions are not to be read as an exhaustive statement on the charitable status of all sports organizations in all circumstances**
- **The SCC held that sport, if ancillary to another recognized charitable purpose, such as education, can be charitable, but not sport in itself**

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Regulation and Governance of Charities

1. Supreme Court of Canada Decision Permits Judicial Interference In Religious Disputes

- On December 14, 2007, the SCC held that the failure to perform a religious obligation may give rise to civil damages
- *Bruker v. Marcovitz*, the SCC upheld a decision of the Quebec Superior Court ordering a Jewish husband to pay \$47,500 in damages to his ex-wife for withholding his consent to a religious divorce, or a *get*, despite contractually agreeing to do so 15 years earlier

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- The majority concluded that agreement to give a *get* was a valid and binding contractual obligation
- Although moral obligations are traditionally not enforceable under contract law, the majority held that moral obligations could be transformed into legally valid and binding ones
- The majority held that “any harm to the husband’s religious freedom in requiring him to pay damages for unilaterally breaching his commitment is significantly outweighed by the harm caused by his unilateral decision not to honour it”
- Justices Deschamps and Charron disagreed with the majority and wrote a dissenting opinion

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- The dissent framed the case differently and observed that the primary issue was “whether the civil courts can be used not only as a shield to protect freedom of religion, but also as a weapon to sanction a religious undertaking”
- The dissent concluded that the wife’s claim was not justiciable, stating that courts have long refused to intervene in religious disputes, unless some property or civil right is affected
- The dissent held that religion has never been used “as a means of forcing another person to perform a religious act, nor have the courts been used to sanction the failure to perform such an act”

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2. Non-Compliance Results in Court-Ordered Wind Up of Not-for-Profit Corporation Under the *Corporations Act* (Ontario)

- In a judgment released on October 3, 2007, the Ontario Superior Court of Justice ordered that a church, incorporated pursuant to the *Corporations Act* (Ontario), be wound up for various statutory breaches
- The decision in *Warriors of the Cross Asian Church v. Masih* attempted to clarify some confusion concerning the level of deference afforded to not-for-profit corporations for technical corporate procedure requirements for meetings

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- Where an error is technical in nature and does not affect the results of an election of directors or some other serious corporate matter, some leniency may be afforded
- However, where the error goes to the heart of an important corporate matter, i.e. the election of directors, it appears that the courts will demand that the internal workings of the not-for-profit corporation strictly adhere to the requirements of the Act
- Where this cannot be, or has not been, achieved, the courts will invoke their discretion to dissolve a non-share capital corporation outright

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3. Fairness, Reasonableness and Good Faith Expectations

- *Chu v. Scarborough Hospital Corp.* is a recent Ontario Divisional Court decision released on July 6, 2007
- The decision involved a dispute between Lai Chu (“Chu”), an annual member of the Scarborough Hospital, and the hospital's board
- In dismissing the appeal, the court quoted from the Ontario Superior Court of Justice’s sound admonishment of the board of directors for having acted unfairly and not in good faith toward the hospital’s membership

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- The Ontario Divisional Court concluded that there was no palpable and overriding error in the trial judge’s decision, which stated that “a board of directors of a *Corporations Act* corporation must interpret and apply its by-laws fairly, reasonably and in good faith”
- This decision joins a growing body of jurisprudence which indicates that non-share capital corporations must rigorously follow corporate governance procedures
- Fairness, reasonableness and good faith are expected at all levels of corporate life irrespective of the type of organization in question

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