



Canada Revenue
Agency

Agence du revenu
du Canada

Our file / Notre référence

Account Number - Numéro de compte
XXX XXX 398

John [REDACTED]
1222 [REDACTED]
Calgary AB T3M [REDACTED]

NOTICE OF CONFIRMATION

This notice refers to your Notice of Objection to the Income Tax reassessment dated October 6, 2011 to the Income Tax assessment for the taxation year 2008.

Having carefully reconsidered the assessment with reference to the information and reasons set forth in your Notice of Objection, the Minister of National Revenue renders the following decision.

Your objection is disallowed and the assessment is confirmed.

The basis of your objection is that the charitable donation in the amount of \$192,548 is correct; and you maintain that the reassessment in respect of the charitable donation claim be reversed for the following reasons:

- You donated Care Units / Medicine Units (CUs/MUs) to Help Eliminate Disease and Addiction Canada (HEDAC).
- You borrowed a Credit Certificate (the "Coupon") from Relief Lending Group Inc. (Program) in exchange for a promissory note payable in eight years, and you prepaid interest for four years.
- The promissory note was repayable by either cash or delivery of the Coupon to the Program.
- You purchased the CUs/MUs from Agkuran Distributing Ltd. (Agkuran) which were paid by the Coupon.
- The fair market value of the CUs/MUs was appraised by a qualified valuator, James Catty from Corporate Valuation Services Limited, and it accurately reflected the value.
- You voluntarily chose to donate the CUs/MUs, and obtained a donation receipt from HEDAC.
- Your primary intention was to make a gift.

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