

What is trending in the tax dispute space?

What is the cost of getting incorrectly reassessed by the CRA?

How do you deal with CRA requests for taxpayer interviews?

Are there circumstances where you may request all or part of a CRA file prior to conclusion of the audit?

How do you manage CRA requests for subjective analysis?

What is your approach to broad CRA audit queries?

How do you deal with procedural fairness concerns, such as a proposal letter that states a conclusion, but does not provide any meaningful analysis?

How do you approach CRA requests for a waiver to extend CRA's time to conduct an audit?



What industries and areas does CRA seem to be targeting?

What is your approach to CRA requests for privileged communications?

Bonus question - What do you think the impact of the SCC's *Deans Knight* decision will be on audits?