

Court File No. BK-26-03367471-0031

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

Court No.: 31-3367471

Estate No.: 31-3367471

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF  
999 GOLD DEPOT (CANADA) LIMITED**

**MOTION RECORD**  
(Returnable July 13, 2026)

**CHAITONS LLP**

Barristers & Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton (LSO No. 21592F)**

Tel: (416) 218-1129

E-mail: [harvey@chaitons.com](mailto:harvey@chaitons.com)

**Danish Afroz (LSO No. 65786B)**

Tel: (416) 218-1137

E-mail: [dafroz@chaitons.com](mailto:dafroz@chaitons.com)

*Lawyers for 999 Gold Depot (Canada) Limited*

**TO: SERVICE LIST**

**SERVICE LIST**  
(as at May 28 2026)

<p><b>CHAITONS LLP</b> 5000 Yonge Street, 10<sup>th</sup> Floor Toronto, ON M2N 7E9</p> <p><b>Harvey Chaiton</b> Tel: (416) 218-1129 Email: <a href="mailto:harvey@chaitons.com">harvey@chaitons.com</a></p> <p><b>Danish Afroz</b> Tel: (416) 218-1137 Email: <a href="mailto:dafroz@chaitons.com">dafroz@chaitons.com</a></p> <p><i>Lawyers for 999 Gold (Canada) Limited</i></p>	<p><b>KSV RESTRUCTURING INC.</b> 220 Bay Street, Suite 1300 Toronto, ON M5J 2W4</p> <p><b>Noah Goldstein</b> Tel: (416) 932-6207 Email: <a href="mailto:ngoldstein@ksvadvisory.com">ngoldstein@ksvadvisory.com</a></p> <p><b>Martin Kosic</b> Tel: (437) 889-1340 Email: <a href="mailto:mkosic@ksvadvisory.com">mkosic@ksvadvisory.com</a></p> <p><i>Proposal Trustee</i></p>
<p><b>BLAKE, CASSELS &amp; GRAYDON LLP</b> 199 Bay Street, Suite 4000 Toronto, ON M5L 1A9</p> <p><b>Chris Burr</b> Tel: (416) 863-3261 Email: <a href="mailto:chris.burr@blakes.com">chris.burr@blakes.com</a></p> <p><i>Lawyers for the Proposal Trustee</i></p>	<p><b>DEPARTMENT OF JUSTICE</b> Ontario Reginal Office, Tax Law Services Division 120 Adelaide Street West, Suite 400 Toronto, Ontario M5H 1T1</p> <p><b>Kelly Smith Wayland, Senior Counsel</b> Tel: (647) 533-7183 Email: <a href="mailto:Kelly.smithwayland@justice.gc.ca">Kelly.smithwayland@justice.gc.ca</a>; <a href="mailto:AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca">AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca</a></p>
<p><b>CANADA REVENUE AGENCY</b> 1 Front Street West Toronto, ON M5J 2X6</p> <p><b>Pat Confalone</b> Tel: (416) 954-6514 Email: <a href="mailto:pat.confalone@cra-arc.gc.ca">pat.confalone@cra-arc.gc.ca</a></p>	<p><b>HIS MAJESTY THE KING IN RIGHT OF THE PROVINCE OF ONTARIO AS REPRESENTED BY THE MINISTER OF FINANCE</b> Insolvency Unit 33 King Street West, 6<sup>th</sup> Floor Oshawa, Ontario L1H 8H5</p> <p><b>Steven Groeneveld</b> Email: <a href="mailto:steven.groeneveld@ontario.ca">steven.groeneveld@ontario.ca</a>; <a href="mailto:insolvency.unit@ontario.ca">insolvency.unit@ontario.ca</a></p>
<p><b>OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY</b> 25 St. Clair Avenue – East (6th Floor) Toronto, ON M4T 1M2</p> <p>Email: <a href="mailto:osbservice-bsfservice@ised-isde.gc.ca">osbservice-bsfservice@ised-isde.gc.ca</a></p>	

**EMAIL ADDRESSES:**

[harvey@chaitons.com](mailto:harvey@chaitons.com); [dafroz@chaitons.com](mailto:dafroz@chaitons.com); [ngoldstein@ksvadvisory.com](mailto:ngoldstein@ksvadvisory.com); [mkosic@ksvadvisory.com](mailto:mkosic@ksvadvisory.com);  
[chris.burr@blakes.com](mailto:chris.burr@blakes.com); [Kelly.smithwayland@justice.gc.ca](mailto:Kelly.smithwayland@justice.gc.ca); [AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca](mailto:AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca); [pat.confalone@cra-arc.gc.ca](mailto:pat.confalone@cra-arc.gc.ca); [insolvency.unit@ontario.ca](mailto:insolvency.unit@ontario.ca);  
[steven.groeneveld@ontario.ca](mailto:steven.groeneveld@ontario.ca); [osbservice-bsfservice@ised-isde.gc.ca](mailto:osbservice-bsfservice@ised-isde.gc.ca)

# INDEX

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

Court No.: 31-3367471  
Estate No.: 31-3367471

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF  
999 GOLD DEPOT (CANADA) LIMITED**

**INDEX**

<b>Tab</b>	<b>Document</b>
1.	Notice of Motion
2.	Affidavit of Erol Aksu sworn July 7, 2026
A	Corporate Profile Report
B	Proposal Letter dated May 27, 2022
C	Letter from Oslers to CRA dated June 16, 2022
D	Letter from CRA dated July 7, 2022
E	Notices of Assessment dated March 2, 2023
F	Notice of Objection to Assessment dated May 10, 2023
G	CRA's Appeal Decision Letter dated May 13, 2024
H	Osler's Response to Appeal Decision Letter dated May 28, 2024
I	Notice of Appeal dated February 9, 2026 (without attachments)
J	Reply to Notice of Appeal dated May 27, 2026
K	Requirement to Pay to RBC dated January 12, 2024
L	Requirement to Pay to Scotiabank dated July 9, 2025
M	Letter from CRA dated October 23, 2025
N	Requirement to Pay to CIBC dated April 22, 2026
O	Letter of Withdrawal re: CICB dated April 2026
P	Email from Chaitons to CIBC dated May 5, 2026
Q	Letter from CRA dated June 25, 2026

R	Cash Flow Forecast
S	Consent to Act as Monitor
3.	Notice of Application
4.	Draft CCAA Initial Order
5.	Blackline to Model Initial Order

**TAB 1**

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

Court No.: 31-3367471

Estate No.: 31-3367471

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF  
999 GOLD DEPOT (CANADA) LIMITED**

**NOTICE OF MOTION  
(Returnable July 13, 2026)**

999 Gold Depot (Canada) Limited (the “**Company**” or the “**Applicant**”) will make a motion before the Ontario Superior Court of Justice (Commercial List) on Monday, July 13, 2026 at 11:00 a.m., or as soon after that time as the motion can be heard.

**PROPOSED METHOD OF HEARING:** The Motion is to be heard

- In writing under subrule 37.12.1(1);
- In writing as an opposed motion under subrule 37.12.1(4);
- In person;
- By telephone conference;
- By video conference,

before the Honourable Justice Steele of the Ontario Superior Court of Justice (Commercial List), at the following Zoom Link:

<https://ca01web.zoom.us/j/67927063702?pwd=c1Z2eFN3NXB1N0xOK0lYSWtCL2ZBZz09#success>

**THE MOTION IS FOR:**

1. An order (the “**Initial Order**”) under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended (the “**CCAA**”), substantially in the form attached at Tab 4 of the Motion Record that, among other things:

- (a) abridges and validates the time for service of this Notice of Motion, Notice of Application and the Motion Record and dispenses with further service thereof;
- (b) declares that the Company is a “debtor company” to which the CCAA applies;
- (c) authorizes and directs that the proposal proceedings commenced by the Company under Division I of Part III of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”), bearing court file no. BK-26-03367471-0031 and Court/Estate File No. 31-3367471 (the “**NOI Proceedings**”), be taken up and continued under the CCAA;
- (d) orders that the Company shall not be deemed to have made an assignment in bankruptcy as a result of not having filed a proposal, and authorizes AlixPartners Restructuring, Inc. (formerly KSV Restructuring Inc.) (“**Alix**” or the “**Proposed Monitor**”) to take such steps as may be necessary in furtherance of its discharge as proposal trustee in the NOI Proceedings;
- (e) appoints Alix as monitor of the Company in the CCAA Proceedings (once appointed in such capacity, the “**Monitor**”);
- (f) provides for a stay, until November 14, 2026 or such other date as the Court may order (the “**Stay Period**”), of all proceedings or enforcement processes in respect of the Applicant, the Directors and Officers of the Applicant, the Monitor, or affecting the Applicant’s Business or Property (each as defined in the Initial Order), except with the written consent of the Applicant and the Monitor, or with leave of the Court, provided that the Tax Appeal (defined below) shall remain procedurally

unaffected by the stay, but the stay shall be applicable to the enforcement of any order made in the Tax Appeal affecting the Monitor, the Business or the Property (the “**Stay of Proceedings**”);

- (g) stays, during the Stay Period, any enforcement process, procedure, right or mechanism in respect of the Tax Assessments (as defined below) or any future tax assessment issued to the Company for the period prior to April 30, 2026, including any right of set-off by Canada Revenue Agency (“**CRA**”) between Pre-Filing Tax Liabilities and Post-Filing Tax Assets (each as defined in the Initial Order) such that Post-Filing Tax Assets are to be processed and paid to the Applicant during the Stay Period as though no Pre-Filing Tax Liability existed;
- (h) authorizes the Applicant to remain in possession and control of its Business and Property, continue operating in the ordinary course, continue using its existing cash management system, and make the payments permitted by the Initial Order;
- (i) grants the Administration Charge and the Directors’ Charge (each as defined in the Initial Order) over the Property; and

2. Such further and other relief as counsel may request and that this Honourable Court may deem just.

## THE GROUNDS FOR THE MOTION ARE:<sup>1</sup>

### *Background*

1. The Company is an established, family-owned and operated precious metals business primarily engaged in the purchase of scrap precious metals, the refinement of those materials through third-party refiners located in Canada and the United States, and the sale of refined metals to customers, primarily investors and jewellers;
2. The Company was incorporated on April 3, 1997 under the *Business Corporations Act* (Ontario) and has its registered head office located at 27 Queen Street East, Suite 901, Toronto, Ontario;
3. Agop Aksu is the Company's sole director, Erol Aksu is the Company's sole shareholder, and the Company currently employs five individuals (including Erol Aksu);
4. The Company does not have any secured creditors;

### *Tax Dispute and CRA Enforcement Activity*

5. CRA issued notices of assessment dated March 2, 2023 (the "**Tax Assessments**") in respect of the Company's GST/HST reporting periods from April 1, 2013 to August 31, 2019 (the "**Reporting Period**") pursuant to which CRA disallowed input tax credits ("**ITCs**") in the total amount of \$15,695,124 and assessed gross negligence penalties under section 285 of the *Excise Tax Act*, together with related interest;

---

<sup>1</sup> Capitalized terms not otherwise defined have the meanings given to them in the Affidavits of Erol Aksu sworn July 7, 2026.

6. The Company disputes the Tax Assessments and filed a notice of objection to the Assessments on May 10, 2023, and a notice of appeal in the Tax Court of Canada dated February 9, 2026, bearing Court File No. 2026-349(GST)G (the “**Tax Appeal**”);
7. The Crown has delivered a reply to the notice of appeal, and the Tax Appeal remains ongoing;
8. CRA has not remitted GST/HST refunds, ITCs, credits and rebates otherwise payable to the Company, including refunds for periods outside the Reporting Period;
9. CRA has taken enforcement steps in respect of the amounts it alleges are owing by the Company, including Requirements to Pay issued to Royal Bank of Canada on January 12, 2024, Scotiabank on July 9, 2025, and Canadian Imperial Bank of Commerce (“**CIBC**”) on April 22, 2026;
10. On October 23, 2025, CRA sent a letter to the Company stating that CRA’s records indicated that the Company owed \$31,807,932.93 and advising that CRA could take legal action without further notice if the Company did not pay or respond;
11. CIBC maintained the Company’s sole operating bank account and, as a result of the April 2026 Requirement to Pay, the Company’s access to funds held at CIBC was frozen, which immediately disrupted the Company’s business operations, created an acute liquidity crisis, and precipitated the Company’s NOI filing;

### ***NOI Proceedings***

12. On April 30, 2026 (the “**NOI Filing Date**”), the Company filed a Notice of Intention to Make a Proposal pursuant to section 50.4 of the BIA and Alix was appointed as Proposal Trustee (the “**Proposal Trustee**”);

13. Following the NOI Filing Date, and following correspondence among the Company’s counsel, the Department of Justice and CIBC, CRA cancelled the April 2026 Requirement to Pay and the Company regained access to its CIBC operating account;

14. On May 28, 2026, the Honourable Justice Conway granted an order extending the time for the Company to file a proposal under the BIA to and including July 14, 2026;

15. On June 25, 2026, CRA issued correspondence advising, among other things, that it is auditing the Company’s GST/HST return for the period from April 1, 2026 to April 30, 2026 as a result of the Company’s NOI filing, and proposing to increase the Company’s net tax payable for that period by \$169,419.27;

### ***Continuation under the CCAA***

16. The Company seeks to have the NOI Proceedings continued under the CCAA pursuant to section 11.6 of the CCAA;

17. The Company has not filed a proposal under the BIA, and the continuation of the NOI Proceedings under the CCAA is consistent with the remedial purpose and flexibility of the CCAA;

18. The information which section 10(2) of the CCAA requires has been provided;

19. The Company is insolvent within the meaning of the CCAA;

20. The Company is a company to which the CCAA applies;
21. CRA asserts a claim in excess of \$31 million, which the Company disputes but cannot pay;
22. Continuation of these proceedings under the CCAA is appropriate and will provide the most effective framework for the Company to preserve its business as a going concern, maintain its relationships with customers, suppliers, refiners and other stakeholders, address CRA enforcement actions, engage with CRA regarding the treatment of Post-Filing Tax Assets and Pre-Filing Tax Liabilities, and determine the most appropriate path to resolve the issues arising from the Tax Assessments and the Company's restructuring;
23. Alix has consented to act as Monitor in the CCAA Proceedings and supports the relief sought in the Initial Order;

***Stay of Proceedings and CRA-Related Relief***

24. The Company seeks a stay of proceedings until November 14, 2026, or such other date as the Court may determine;
25. The stay is necessary to preserve the stability achieved during the NOI Proceedings and to allow the Company to continue operating as a going concern while advancing its restructuring efforts;
26. Without the stay, the Company may be exposed to further enforcement steps, collection activity, requirements to pay, garnishments, restrictions on its bank accounts, set-off, or other remedies that would impair liquidity and disrupt operations;

27. A meaningful stay period is required to permit the Tax Appeal and related CRA issues to advance while preserving stability;

28. The Company also seeks to stay enforcement in respect of the Tax Assessments or any future tax assessment issued to the Company including any asserted set-off of Post-Filing Tax Assets against Pre-Filing Tax Liabilities during the Stay Period, which is necessary to preserve liquidity, maintain ordinary-course operations, and allow the Company to pursue the restructuring and the Tax Appeal;

### ***Cash Flow Forecast***

29. A 13-week cash-flow forecast prepared by the Company, with the assistance of the Proposed Monitor, demonstrates that the Company will have sufficient liquidity to fund its operations and the costs of these proceedings during the proposed Stay of Proceedings;

### ***Priority Charges***

30. The Company does not maintain directors' and officers' liability insurance;

31. The Company seek the granting of the following Court-ordered charges as part of the relief under the Initial Order, in the following priority:

- (a) **First:** a charge up to a maximum amount of CAD 500,000 to secure the fees and disbursements of the Proposed Monitor, counsel to the Proposal Monitor, and insolvency and tax counsel for the Company (the "**Administration Charge**"); and
- (b) **Second:** a charge up to a maximum amount of CAD 165,000 in favour of the Company's Director and Officers (the "**Directors' Charge**");

32. Alix, in its capacity as the Proposal Trustee and the Proposed Monitor for the CCAA Proceedings, supports the continuation of the NOI Proceedings under the CCAA and the relief sought in the Initial Order;
33. No creditor will be materially prejudiced by the granting of the relief sought;

***Further Grounds***

34. The facts and circumstances set out in the Affidavit of Erol Aksu sworn July 7, 2026 (the “**Aksu Affidavit**”);
35. The facts and circumstances set out in the Joint Report of Alix in its capacity as Proposal Trustee and proposed Monitor, to be filed (the “**Joint Report**”);
36. The provisions of the BIA, including section 50.4(9), and the statutory, inherent and equitable jurisdiction of this Honourable Court;
37. The provisions of the CCAA, including sections 2(1), 3(1), 10(2), 11, 11.02, 11.52, 11.6, 11.7, and the statutory, inherent and equitable jurisdiction of this Honourable Court;
38. Rules 1.04, 1.05, 2.01, 2.03, 16.04 and 37 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, as amended, and section 106 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended; and
39. Such other grounds as counsel may advise and this Honourable Court may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the hearing of the Motion:

40. The Aksu Affidavit;

41. The Joint Report, to be filed;
42. The consent of Alix to act as Monitor in the CCAA proceedings; and
43. Such further and other evidence as the lawyers may advise and this Honourable Court may permit.

July 7, 2025

**CHAITONS LLP**

Barristers and Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton (LSO No. 21592F)**

Tel: (416) 218-1129

E-mail: [harvey@chaitons.com](mailto:harvey@chaitons.com)

**Danish Afroz (LSO No. 65786B)**

Tel: (416) 218-1137

E-mail: [dafroz@chaitons.com](mailto:dafroz@chaitons.com)

*Lawyers for 999 Gold Depot (Canada) Limited*

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 999 GOLD DEPOT (CANADA) LIMITED**

Court No.: 31-3367471

Estate No.: 31-3367471

Court File No: BK-25-03268936-0031

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
**(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT TORONTO

**NOTICE OF MOTION**  
**(Returnable July 13, 2026)**

**CHAITONS LLP**

Barristers and Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton (LSO No. 21592F)**

Tel: (416) 218-1129

E-mail: [harvey@chaitons.com](mailto:harvey@chaitons.com)

**Danish Afroz (LSO No. 65786B)**

Tel: (416) 218-1137

E-mail: [dafroz@chaitons.com](mailto:dafroz@chaitons.com)

*Lawyers for 999 Gold Depot (Canada) Limited*

**TAB 2**

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

Court No.: 31-3367471  
Estate No.: 31-3367471

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF  
999 GOLD DEPOT (CANADA) LIMITED**

**AFFIDAVIT OF EROL AKSU**

**(sworn July 7, 2026)**

I, Erol Aksu, of the City of Richmond Hill, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I was a director of 999 Gold Depot (Canada) Limited (the “**Company**”) until March 5, 2023, and am currently employed by the Company, and am the Company’s sole shareholder. I am familiar with the business and operations of the Company as an employee and a former director of the Company for the periods on and prior to March 5, 2023 and solely as an employee of the Company for the periods after March 5, 2023. I have personal knowledge of the facts stated in this affidavit, except where stated to be on the basis of information and belief, and where so indicated, I verily believe such facts to be true. Nothing in this Affidavit, or the making of this Affidavit, is intended to waive any legal or other privilege.

2. All references to currency in this affidavit are in CAD, unless otherwise indicated.

3. On April 30, 2026 (the “**NOI Filing Date**”), the Company filed a Notice of Intention to Make a Proposal (a “**NOI**”) pursuant to section 50.4 of the *Bankruptcy and Insolvency Act*, R.S.C.

1985, c. B-3, as amended (the “**BIA**”). AlixPartners Restructuring, Inc. (formerly KSV Restructuring Inc.) (“**Alix**”) was appointed as the Company’s proposal trustee (the “**Proposal Trustee**”). The principal purpose of the proposal proceedings commenced by the Company, under Division I of Part III of the BIA (the “**NOI Proceedings**”) was to create a stabilized environment in which the Company could preserve its enterprise value, continue operating as a going concern, and pursue a restructuring process to address the liquidity and operational concerns arising from the Tax Assessments (as defined below) and Canada Revenue Agency’s (“**CRA**”) related enforcement activities.

4. On May 28, 2026, the Honourable Justice Conway granted an order extending the time for the Company to file a proposal under the BIA to and including July 14, 2026 (the “**NOI Extension Order**”).

5. This affidavit is made in support of a motion by the Company to continue or commence (as applicable) proceedings (the “**CCAA Proceedings**”) under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the “**CCAA**”).

6. The Company seeks an initial order (the “**Initial Order**”) in the form of the draft order included at Tab 4 of the Motion Record:

- (a) declaring that the Company is a “debtor company” to which the CCAA applies;
- (b) directing that the NOI Proceedings be taken up and continued under the CCAA;

- (c) appointing Alix (the “**Proposed Monitor**”) as monitor in the CCAA Proceedings to monitor the assets, business, and affairs of the Company (once appointed in such capacity, the “**Monitor**”);
- (d) staying until November 14, 2026, or such other date as the Court may Order (the “**Stay Period**”), all proceedings and remedies taken or that might be taken in respect of the Company, the Director and Officers (as defined in the Initial Order) of the Company, the Monitor, or affecting the Company’s business (the “**Business**”) or Property (as defined below), except with the written consent of the Company and the Monitor, or with leave of the Court (the “**Stay of Proceedings**”) provided that the Stay of Proceedings shall not apply to the proceeding in the Tax Court of Canada bearing Court File No. 2026-349(GST)G which, for avoidance of doubt, shall remain procedurally unaffected by the Stay of Proceedings without further Order of the Court, but the Stay of Proceedings is applicable to the enforcement of any order made in such proceeding affecting the Monitor, the Business or the Property;
- (e) staying, during the Stay Period, any enforcement process, procedure, right or remedy in respect of the Tax Assessments or any future tax assessment issued to the Company for the period prior to the NOI Filing Date, including any right of set-off by CRA between pre-NOI Filing Date tax liabilities (each a “**Pre-Filing Tax Liability**”) and post-NOI Filing Date tax assets, including without limitation Input Tax Credits (“**ITCs**”) or GST/HST refunds (each a “**Post-Filing Tax Asset**”), such

that Post-Filing Tax Assets are to be processed and paid to the Company during the Stay Period as though no Pre-Filing Tax Liability existed; and

- (f) granting the Administration Charge and the Directors' Charge (each defined below) over the Company's current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate, including all proceeds thereof (collectively, the "**Property**").

## **A. OVERVIEW<sup>1</sup>**

7. The Company is an established, family-owned and operated precious metals business primarily engaged in the purchase of scrap precious metals, the refinement of those materials through third-party refiners located in Canada and the United States, and the sale of refined metals to customers, primarily investors and jewellers.

8. On March 2, 2023, CRA assessed the Company for the reporting periods April 1, 2013 to August 31, 2019 (the "**Reporting Period**") by disallowing ITCs claimed by the Company during the Reporting Period in the total amount of approximately \$15.7 million and assessing penalties and interest. As discussed further below, the CRA's Tax Assessments, and CRA's related enforcement activities, including the issuance of several Requirements to Pay to financial institutions, were the driving cause for the Company's NOI filing. The Company disputes the Tax Assessments (as defined below) and has filed a Notice of Appeal in the Tax Court of Canada dated February 9, 2026.

---

<sup>1</sup> Terms not otherwise defined in this section of the Affidavit, shall have the meaning ascribed to such terms in the body of the Affidavit.

9. The NOI filing stabilized the immediate liquidity crisis facing the Company insofar that the Requirement to Pay affecting the Company's operating bank account at Canadian Imperial Bank of Commerce ("CIBC") was withdrawn, access to the CIBC account was restored, and the Company was able to resume ordinary-course operations.

10. CRA has also not remitted GST/HST refunds, ITCs, credits and rebates otherwise payable to the Company, including refunds for periods outside the Reporting Period. This has reduced the Company's liquidity and materially impaired its business-to-business operations.

11. At the motion seeking the NOI Extension Order, the Company advised the Court that it was evaluating whether the Company's further restructuring efforts should proceed under the BIA or CCAA. The Company has concluded, in consultation with its advisors and the Proposal Trustee, that the CCAA is the more appropriate framework for the Company's restructuring efforts. Among other things, the Company needs the more flexible framework provided by the CCAA to:

- (a) address CRA's enforcement and collection activities;
- (b) permit the Company to engage with CRA regarding the Company's alleged GST/HST liability and the release of refunds; and
- (c) provide a platform to explore accelerating the process to a resolution of the Tax Appeal (as defined below).

12. In the circumstances, the Company is insolvent and seeks to continue its NOI Proceedings under the CCAA. The Company's liabilities, including CRA's claim, exceed \$5 million. CRA

asserts a claim in excess of \$31 million, which the Company disputes but cannot pay. The Company is therefore a debtor company to which the CCAA applies.

## **B. THE COMPANY AND THE BUSINESS**

### **i. Corporate background and the Business**

13. The Company was incorporated on April 3, 1997, under the *Business Corporations Act* (Ontario), R.S.O. 1990, c B.16. Its registered head office is located at 27 Queen Street East, Suite 901, Toronto, Ontario. All of the issued and outstanding shares of the Company are owned by me. I previously served as the director of the Company until March 5, 2023. The Company has no officers. Agop Aksu is the sole director of the Company and makes executive decisions in respect of the Company as needed. A copy of the Corporate Profile Report for the Company is attached hereto as **Exhibit “A”**.

14. The Company’s Business entails purchasing scrap precious metals, including gold, silver, platinum, palladium, dental scrap, grindings, filings, polishing dust and sweeps, and arranging for those materials to be refined through third-party refiners located in Canada and the United States. Once those materials are refined into bullion form, the Company sells the refined precious metals to customers, primarily investors and jewellers.

15. Although the Company conducts business involving various precious metals, the tax dispute with CRA primarily concerns the Company’s gold purchasing, refining and resale activities.

### **ii. Leased Real Property**

16. The Company is a tenant under a lease (the “**Lease**”) for its leased premises located at Unit 901, 27 Queens Street East, Toronto, Ontario (the “**Premises**”) with Lakeshore Developments (Bronte) Ltd (the “**Landlord**”).

17. The Company’s monthly obligation under the Lease, inclusive of, among other things, rent, utilities, realty tax, and other taxes and charges, is approximately \$4,360.46, payable on the first day of each month.

**iii. Employees**

18. The Company is a family-owned and operated business which currently employs 5 individuals, including myself (the “**Employees**”). There are four full-time Employees and one part-time Employee.

19. The Employees are paid on a bi-weekly basis, in arrears. The Company’s aggregate gross payroll is approximately \$20,000 bi-weekly. The Company is current on the payment of employee source deductions.

**iv. Commercial mechanics of the Company’s gold Business**

20. When purchasing gold, the Company generally pays suppliers 98% of the value of the gold contained in the scrap, retaining a modest margin and potentially benefitting from favourable fluctuations in gold prices between receipt of the scrap gold and the sale of refined gold on the market. Alternatively, where there are significant quantities of precious metals other than gold in the scrap, the Company may agree to pay approximately 85% of the value of all precious metals in the scrap.

21. The Company generally paid significant amounts of GST/HST on scrap precious metals purchases while collecting comparatively smaller amounts of GST/HST on sales of refined investment-grade gold, many of which were treated as zero-rated or exempt for GST/HST purposes. As a result, the Company historically generated substantial ITCs and recurring GST/HST refund claims in the ordinary course. The Company files GST/HST returns on a monthly basis.

22. During the Reporting Period, the Company dealt with approximately 439 gold suppliers, primarily jewellers, jewellery manufacturers, and wholesalers, who supplied scrap gold to the Company either in person or through delivery services. The Company's position is that these transactions constituted taxable supplies of unrefined gold to the Company for GST/HST purposes.

23. The Company depends on the timely processing and payment of GST/HST refunds to maintain adequate working capital and liquidity. CRA's failure to remit GST/HST refunds has materially affected the Company's operations. In response, the Company has reduced its business-to-business scrap precious metals operations and now generally limits its activities to transactions that do not result in significant GST/HST refund claims. In particular, the Company only undertakes GST/HST-taxable transactions to the extent they do not place the Company in a refund position and has instead focused on transactions where GST/HST does not apply. This has allowed the Company to continue operating notwithstanding the delayed or paused GST/HST refunds, but at a materially reduced level of business-to-business activity.

## **C. TAX DISPUTE WITH CRA**

### **i. Proposal Letter**

24. CRA initially proposed to reassess the Company by letter dated May 27, 2022 (the “**Proposal Letter**”). In the Proposal Letter, CRA proposed to disallow ITCs claimed by the Company on the basis of CRA’s allegation that certain transactions formed part of a scrap gold carousel scheme and that the related invoices and documents did not support the Company’s ITC claims. A copy of the Proposal Letter is attached hereto as **Exhibit “B”**.

25. The Company, through its then tax counsel, Osler, Hoskin & Harcourt LLP (“**Osler**”), requested that CRA provide the facts on which CRA’s proposal was based by letter dated June 16, 2022 (the “**June 2022 Letter**”). CRA responded by letter dated July 7, 2022 (the “**July 2022 Letter**”). Copies of the June 2022 Letter and July 2022 Letter are attached hereto as **Exhibits “C”** and “**D**”, respectively.

**ii. The Tax Assessments**

26. CRA issued Notices of Assessment dated March 2, 2023 in respect of the Company’s GST/HST Reporting Period from April 1, 2013 to August 31, 2019 (the “**Tax Assessments**”). Pursuant to the Tax Assessments, CRA disallowed ITCs in the total amount of \$15,695,124, and assessed gross negligence penalties under section 285 of the *Excise Tax Act* together with related interest. Copies of the results page of the Tax Assessments, together with summaries of the amounts disallowed, penalties and interest, are attached hereto collectively as **Exhibit “E”**.

**iii. Notice of Objection**

27. The Company strongly disputes the Tax Assessments. The Company’s position is that it purchased scrap gold in the ordinary course of its Business from GST/HST-registered suppliers,

documented those transactions in the ordinary course, exercised due diligence with supplier verification and transaction documentation, and did not participate in any carousel scheme.

28. On May 10, 2023, the Company filed a Notice of Objection to the Tax Assessments (the “**Notice of Objection**”) seeking the reversal of the denied ITCs, and reversal of the penalties assessed under section 285 of the *Excise Tax Act*, together with related relief. A copy of the Notice of Objection, without schedules and appendices, is attached hereto as **Exhibit “F”**.

**iv. CRA Appeals Division Letter and Company’s Response thereto**

29. On May 13, 2024, CRA’s Appeals Division issued a letter to the Company confirming the Tax Assessments (the “**Appeals Division Letter**”). By letter dated May 28, 2024, Osler responded to the Appeals Division Letter, disputed CRA’s allegations, requested particulars and underlying facts supporting those allegations, and addressed other elements raised in the Appeals Division Letter (the “**May 28 Letter**”). Copies of the Appeals Division Letter and May 28 Letter are attached hereto as **Exhibits “G”** and “**H**”, respectively.

**v. Company’s Tax Court Appeal**

30. The Company filed a Notice of Appeal in the Tax Court of Canada dated February 9, 2026 (the “**Notice of Appeal**”). The Notice of Appeal challenges the Tax Assessments and seeks relief in respect of the denied ITCs, the section 285 penalties and related interest. A copy of the Notice of Appeal, without schedules, is attached hereto as **Exhibit “I”**.

**vi. Crown’s Reply to the Company’s Tax Court Appeal**

31. As of the date of the Company's NOI Filing, the Company was awaiting a Reply to the Notice of Appeal from the Crown, the deadline for which was June 1, 2026. The Crown has since delivered a Reply to the Notice of Appeal dated May 27, 2026 (the "**Reply**"). A copy of the Reply is attached hereto as **Exhibit "J"**.

32. In the Reply, the Crown pleads, among other things, that the Company carried on legitimate business activity but also participated in a carousel scheme involving numerous non-*bona fide* suppliers. The Company disputes the Crown's allegations.

33. The Tax Appeal remains ongoing. I understand from the Company's tax counsel that the Tax Appeal will require further procedural steps before it can be determined on its merits. I understand from the Company's tax counsel that the next steps are expected to include the closing of pleadings, documentary disclosure and production, examinations for discovery, motions as required, settlement discussions or alternative dispute resolution, pre-hearing procedures, scheduling, a hearing or trial, and judgment, all of which may take approximately one and a half years to two years to complete.

34. The Company seeks a Stay of Proceedings until November 14, 2026 to permit the Tax Appeal process to advance while preserving the Company's business as a going concern. A meaningful stay period is required for the aforementioned steps to be completed.

#### **D. CRA ENFORCEMENT ACTIVITY AND EVENTS LEADING TO THE NOI FILING**

35. On January 12, 2024, CRA issued a Requirement to Pay to Royal Bank of Canada ("**RBC**") in respect of \$27,944,666.52, requiring RBC to remit to CRA any amounts payable by RBC to the Company ("**January 2024 RTP**"). At the time the January 2024 RTP was issued, the Company

did not maintain accounts with RBC and, accordingly, the January 2024 RTP did not have an impact on the Company. A copy of the January 2024 RTP is attached hereto as **Exhibit “K”**.

36. On July 9, 2025, CRA issued a Requirement to Pay to Scotiabank in respect of \$31,054,133.85 (the “**July 2025 RTP**”). At the time the July 2025 RTP was issued, the Company did not maintain accounts with Scotiabank and, accordingly, the July 2025 RTP did not impact the Company’s operations or liquidity. A copy of the July 2025 RTP is attached hereto as **Exhibit “L”**.

37. On October 23, 2025, CRA sent a letter to the Company (the “**October 2025 Letter**”) stating that CRA’s records indicated that the Company owed \$31,807,932.93 and advising that, unless the Company paid or responded within 14 days, CRA could take legal action without further notice, including garnishing income and bank accounts, seizing and selling assets, and other enforcement measures. A copy of the October 2025 Letter is attached hereto as **Exhibit “M”**.

38. On April 22, 2026, CRA issued a Requirement to Pay to CIBC in respect of \$31,822,645.36 (the “**April 2026 RTP**”). A copy of the April 2026 RTP is attached hereto as **Exhibit “N”**.

39. CIBC maintained the Company’s sole operating bank account. As a result of the April 2026 RTP, the Company’s access to funds held at CIBC was frozen, which immediately disrupted the Company’s business operations and created an acute liquidity crisis. The Company was unable to use the funds in its CIBC account to pay suppliers, receive and process customer payments, pay rent, meet payroll obligations and otherwise conduct operations in the ordinary course. The April 2026 RTP effectively froze the Company’s day-to-day business operations and precipitated the Company’s NOI filing.

40. Furthermore, as previously noted, since the commencement of CRA's audit and reassessment process, CRA has not remitted GST/HST refunds claimed by the Company in the ordinary course. As discussed above, the Company is required to pay GST/HST to suppliers upfront in connection with scrap precious metals purchases while generating relatively modest margins on refining transactions. As a result, the Company relies on the ordinary-course recovery of ITCs and GST/HST refunds to fund ongoing operations and maintain working capital.

41. As previously mentioned, CRA's failure to remit GST/HST refunds has materially affected the Company's operations. In response, the Company has reduced its business-to-business scrap precious metals operations and now generally limits its activities to transactions that do not result in significant GST/HST refund claims. In particular, the Company only undertakes GST/HST-taxable transactions to the extent they do not place the Company in a refund position and has instead focused on transactions where GST/HST does not apply. This has allowed the Company to continue operating notwithstanding the delayed or paused GST/HST refunds, but at a materially reduced level of business-to-business activity.

42. Following consultation with the Company's insolvency lawyers, Chaitons LLP ("**Chaitons**"), the Company's management determined that it was in the best interests of the Company's stakeholders to commence the NOI Proceedings under the BIA to explore its restructuring options under the supervision of this Court.

## E. DEVELOPMENTS DURING THE NOI PROCEEDINGS

43. The NOI Proceedings provided the Company with an urgently required stay of proceedings that enabled the Company to stabilize operations, regain access to liquidity, preserve enterprise value and continue operating as a going concern for the benefit of its stakeholders.

44. On May 1, 2026, Chaitons contacted a representative at the Department of Justice (“**DOJ**”) to seek the withdrawal of the April 2026 RTP so that the Company could regain access to funds held in its CIBC account. Chaitons and DOJ subsequently engaged in correspondence which resulted in CRA issuing a letter dated May 5, 2026 to CIBC advising that, effective May 4, 2026, the April 2026 RTP in the amount of \$31,822,645.36 had been cancelled (the “**April 2026 RTP Withdrawal Letter**”). The April 2026 RTP Withdrawal Letter further stated that “cancelling the requirement to pay does not affect the rights of the Canada Revenue Agency under any of the acts it administers”. A copy of the April 2026 RTP Withdrawal Letter is attached hereto as **Exhibit “O”**.

45. Despite the issuance of the April 2026 RTP Withdrawal Letter, the Company’s CIBC account remained frozen. Accordingly, on May 5, 2026, Chaitons wrote to CIBC requesting that the Company’s account be unfrozen so that the Company could resume ordinary-course operations (the “**May 5 Email**”). A copy of the May 5 Email is attached hereto as **Exhibit “P”**.

46. Following further correspondence between Chaitons and CIBC, the Company’s CIBC account was unfrozen and the Company regained access to the funds required to continue operating its business.

47. On June 25, 2026, CRA issued correspondence to the Company advising, among other things, that CRA is auditing the Company's GST/HST return for the period from April 1, 2026 to April 30, 2026 as a result of the Company's NOI filing. A copy of CRA's June 25, 2026 proposal letter, together with the proposed statement of adjustments (collectively, the "**CRA June 2026 Letter**"), is attached hereto as **Exhibit "Q"**.

48. In the CRA June 2026 Letter, CRA proposes to increase the Company's net tax payable for that period by \$169,419.27, from \$36,162.92 (as filed) to \$205,546.19. The proposed adjustment appears to be based on CRA's review of the creditor list prepared in connection with the NOI Proceedings insofar that CRA appears to have treated a portion of the Company's listed unsecured creditor claims as unpaid taxable supplies and calculated GST/HST payable on that amount. The Company does not agree that the creditor list supports the proposed adjustment and is reviewing the matter with its advisors.

49. The Company understands that CRA has invited the Company to provide further information before July 27, 2026, including any updated creditor information, proof of payments, and information identifying creditors whose claims did not involve taxable supplies or in respect of which GST/HST was not applicable. The Company, with the assistance of its advisors and Alix, intends to respond to CRA's proposal set out in the CRA June 2026 Letter.

## **F. FINANCIAL POSITION**

### **i. Financial Statements**

50. The Company's last unaudited compiled financial statements was for the year ended December 31, 2025. The Company's balance sheet as at December 31, 2025 is presented below:

**999 Gold Depot (Canada) Limited**  
**Balance Sheet**  
**As at December 31, 2025**  
(Unaudited - See Compilation Engagement Report)

	2025	2024
<b>Assets</b>		
Current		
Cash	\$ 2,334,845	\$ 1,393,789
Accounts receivable	1,792,398	1,657,729
Advances to related corporation	1,963,543	1,963,543
Prepaid expenses	1,000	-
Income taxes recoverable	-	135,767
Inventory	500,287	1,564,881
	6,592,073	6,715,709
Property and equipment	40,650	53,032
	<b>\$ 6,632,723</b>	<b>\$ 6,768,741</b>
<b>Liabilities</b>		
Current		
Accounts payable and accrued liabilities	\$ 4,279	\$ 140,185
Income taxes payable	11,144	-
Customer deposits	1,472,644	1,551,393
	1,488,067	1,691,578
<b>Shareholders' Equity</b>		
Share capital	51	51
Retained earnings	5,144,605	5,077,112
	5,144,656	5,077,163
	<b>\$ 6,632,723</b>	<b>\$ 6,768,741</b>

51. As of July 4, 2026, the Company had approximately \$1.06 million in net available cash on hand.

52. The Company does not have any secured creditors.

**ii. Cash Flow Forecast**

53. With the assistance of the Proposal Trustee, the Company has prepared a 13-week cash flow forecast (the “**Cash Flow Forecast**”) for the week ending July 10, 2026 to the week ending November 14, 2026. A summary of the cash flow appears below.

54. The Company's opening cash balance on July 4, 2026 was approximately \$1.06 million. Over the period of the Cash Flow Forecast, the Company has net receipts of \$12.99 million and net disbursements of \$13.49 million. The Cash Flow Forecast shows that the Company has sufficient liquidity to satisfy its post-filing obligations, including professional fees, without the immediate need for debtor-in-possession financing. The full 13-week cash flow is attached hereto as **Exhibit "R"**.

**iii. Cash Management**

55. The Company operates a CAD and USD bank account at CIBC and a CAD bank account at RBC. As discussed above, the Company's RBC account is currently restricted. The Company also holds physical cash on hand at its head office. The physical cash on hand and bank accounts at CIBC are used to facilitate day-to-day operational needs.

56. The Company's main operating accounts are the CIBC accounts. The Company's cash management system is centralized through its operating accounts at CIBC. Customer receipts are deposited into the Company's operating accounts. The Company uses the funds in such accounts to pay suppliers, operating expenses, payroll, taxes and other business obligations in the ordinary course.

57. The Company currently has two (2) credit cards. The Company uses the credit cards to facilitate payment of various expenses related to office, advertising, telephone and general and administrative expenses. The credit cards do not have a material balance.

**G. RELIEF SOUGHT AT THE INITIAL HEARING**

**i. Need for CCAA Protection and Continuation of the NOI Proceedings**

58. As described above, the Company commenced the NOI Proceedings to obtain the stability necessary to address the immediate liquidity crisis caused by the April 2026 RTP, preserve its enterprise value, continue operating as a going concern and pursue a restructuring process to address the liquidity and operational concerns arising from the Tax Assessments and CRA's related enforcement activities.

59. The NOI Proceedings provided the Company with an urgently required stay of proceedings. Among other things, the NOI Proceedings allowed the Company to stabilize its operations, obtain the withdrawal of the April 2026 RTP, regain access to its operating account at CIBC and resume ordinary-course operations.

60. The Company has not filed a proposal under the BIA.

61. The Company has determined, in consultation with its legal advisors and the Proposal Trustee, that the CCAA is the more appropriate framework for the Company's restructuring efforts.

62. The Company requires the flexibility and stability available under the CCAA to address the issues that remain unresolved following the NOI Filing Date, including CRA's enforcement and collection activity, CRA's failure to remit post-NOI Filing Date GST/HST refunds, the need to preserve the Company's liquidity and working capital, and to pursue the Tax Appeal. As previously discussed, the Tax Appeal is anticipated to take significantly longer than the 6 months available under the BIA for the Company to make a proposal to creditors, and the CCAA provides considerably more flexibility from a time perspective than the NOI Proceedings. The Company

requires this time, under the supervision of the Monitor (if appointed) and the Court, to effectively address the Tax Appeal and any associated restructuring requirements.

63. The proposed continuation of the NOI Proceedings under the CCAA will preserve the stability achieved during the NOI Proceedings while providing a more flexible framework for the Company's restructuring.

64. I believe that continuing the NOI Proceedings under the CCAA is necessary and appropriate in the circumstances and is in the best interests of the Company and its stakeholders.

**ii. Proposed Monitor**

65. The proposed Initial Order contemplates that Alix will act as Monitor in these CCAA Proceedings.

66. Alix currently acts as Proposal Trustee in the NOI Proceedings. In that capacity, Alix has gained an understanding of the Company, the Business, the Company's financial circumstances, the Tax Assessments, CRA's enforcement activity, the Company's liquidity issues, the Cash Flow Forecast and other facts and matters relating to the Company's Business and Property.

67. I believe that Alix is in the best position to act as monitor of the Company, including to supervise the Company's restructuring efforts, engage with CRA and other stakeholders, and report to the Court on the status of the Company's activities.

68. The appointment of Alix as Monitor will provide continuity and avoid unnecessary duplication of effort and expense.

69. I understand that Alix is a trustee within the meaning of section 2 of the BIA and is not subject to any of the restrictions on who may be appointed as monitor set out in section 11.7(2) of the CCAA.

70. I understand that Alix has consented to act as Monitor in these CCAA Proceedings if the proposed Initial Order is granted. A copy of Alix's consent to act as Monitor is attached hereto as **Exhibit "S"**.

71. I understand that Alix, in its capacity as Proposal Trustee and Proposed Monitor, supports the relief sought by the Company.

**iii. Stay of Proceedings**

72. The Company seeks a Stay of Proceedings until November 14, 2026, or such other date as this Court may order. The Company has been subject to the stay imposed in the NOI Proceedings since April 30, 2026. I understand that when the Company obtained the NOI Extension Order all stakeholders with a material interest in the Company's restructuring proceedings, including the CRA and Department of Justice, were served with the Company's motion materials. In those motion materials, the Company advised the Court that the Company was contemplating continuing its NOI Proceedings under the CCAA. In the circumstances, I believe that requiring the Company to return to Court within ten (10) days for a comeback hearing or restricting the Stay of Proceedings to a shorter period, is unnecessary and would be inefficient.

73. The Stay of Proceedings is necessary to preserve the stability achieved during the NOI Proceedings and to allow the Company to continue operating as a going concern while it advances its restructuring efforts.

74. Without the Stay of Proceedings, the Company may be exposed to further enforcement steps, collection activity, requirements to pay, garnishments, restrictions on its bank accounts, set-off, or other remedies that would impair the Company's liquidity and disrupt its operations.

75. The Company's experience with the April 2026 RTP demonstrates the immediate and serious effect that enforcement activity can have on the Business. When CRA issued the April 2026 RTP to CIBC, the Company's access to its operating funds was frozen, which disrupted the Company's ability to pay suppliers, receive and process customer payments, pay rent, meet payroll obligations and otherwise operate in the ordinary course.

76. The Company requires the Stay of Proceedings to prevent further disruption to its bank accounts, receipts, Post-Filing Tax Assets and other liquidity sources while it pursues its restructuring under the supervision of this Court and the Monitor.

77. The Stay of Proceedings is also necessary to protect the Company's Directors and Officers, the Monitor, the Company's employees, advisors, including counsel, and other representatives acting in such capacities, so that they may focus on the Company's restructuring efforts without the distraction and cost of separate proceedings or enforcement steps relating to the Company's obligations.

78. I believe that the Stay of Proceedings is necessary and appropriate in the circumstances and is in the best interests of the Company and its stakeholders.

**iv. CRA Enforcement and Post-Filing Tax Assets**

79. As described above, the Company's Business depends on the timely processing and payment of ITCs, GST/HST refunds and other Post-Filing Tax Assets. CRA's failure to remit GST/HST refunds impairs the Company's ability to fund the professional and litigation costs necessary to advance the Tax Appeal and pursue its restructuring.

80. The Company requires certainty that post-NOI Filing Date ITCs, GST/HST refunds and other Post-Filing Tax Assets will be processed and paid to the Company in the ordinary course and will not be set off against Pre-Filing Tax Liabilities, including amounts asserted under the Tax Assessments.

81. The relief sought by the Company is not intended to determine the merits of the Tax Assessments or the Tax Appeal. The Company disputes the Tax Assessments and the Tax Appeal will remain the forum in which the Tax Assessments are determined, subject to further Order of the Court.

82. The Company seeks relief staying, during the Stay Period, any enforcement process, procedure, right or remedy in respect of the Tax Assessments or any future tax assessment issued to the Company, including any asserted right of set-off by CRA between Pre-Filing Tax Liabilities and Post-Filing Tax Assets.

83. The Company also seeks an order requiring CRA to process and pay to the Company any Post-Filing Tax Assets that become payable after the NOI Filing Date, without setting-off such amounts against Pre-Filing Tax Liabilities.

84. I believe this relief is necessary to preserve the Company's liquidity, maintain ordinary-course operations, preserve going-concern value and allow the Company to pursue its restructuring efforts under the supervision of this Court and the Monitor.

**v. Administration Charge**

85. It is contemplated that a Court-ordered charge over the Property would be granted in favour of the Monitor, counsel to the Monitor and counsel to the Company (including the Company's insolvency counsel and the Company's tax counsel), to secure payment of their professional fees and disbursements, whether incurred before or after the date of the Initial Order (the "**Administration Charge**").

86. The proposed Administration Charge being sought pursuant to the Initial Order is for a maximum amount of \$500,000.

87. The Administration Charge is proposed to rank in priority to the Directors' Charge and otherwise in the priority set out in the proposed Initial Order.

88. In preparing the Cash Flow Forecast, the Company, in consultation with Alix, considered the professional fees forecast to be incurred during the applicable period.

89. The Company expects to incur professional fees in connection with these CCAA Proceedings, including fees relating to:

- (a) preparing and advancing the Initial Order motion;
- (b) preparing the proposed Monitor's pre-filing report and related reporting materials;

- (c) preparing statutory notices, mailings and communications;
- (d) communicating with CRA, the DOJ and other applicable Tax Enforcement Entities;
- (e) addressing issues relating to the Tax Assessments, the Tax Appeal, Post-Filing Tax Assets, GST/HST refunds and ITCs;
- (f) communicating with customers, suppliers, refiners and other stakeholders;
- (g) monitoring the Company's receipts, disbursements and cash flow;
- (h) addressing any bank account restrictions or liquidity issues;
- (i) considering and implementing restructuring alternatives; and
- (j) attending any further hearing or other step required in these CCAA Proceedings.

90. Accordingly, I believe the quantum of the Administration Charge sought is reasonably necessary at this time to secure the professional fees of the beneficiaries of the Administration Charge for the applicable period.

91. The beneficiaries of the Administration Charge have contributed, and will continue to contribute, to the Company's restructuring efforts. Each of the beneficiaries of the Administration Charge will have distinct roles in the Company's restructuring.

92. The Company requires the expertise, knowledge and continued participation of the beneficiaries of the Administration Charge to complete a successful restructuring.

93. I understand that Alix is supportive of the Administration Charge and its quantum.

94. I believe that the Administration Charge is reasonable and appropriate in the circumstances.

**vi. Directors' Charge**

95. It is contemplated pursuant to the proposed Initial Order that the Company's former, current or future directors or officers (i.e. the Directors and Officers), would be granted a Court-ordered charge over the Property, up to a maximum amount of \$165,000 (the "**Directors' Charge**").

96. The Directors' Charge is intended to address potential claims that may be brought against the Directors and Officers following the commencement of these CCAA Proceedings.

97. The Company's ordinary-course operations give rise to potential director and officer liability, including on account of payroll obligations, vacation pay, employee source deductions, sales taxes, goods and services taxes, harmonized sales taxes and other amounts payable to employees or government entities.

98. The Company currently employs five individuals and is required to continue meeting payroll and source deduction obligations in the ordinary course during these CCAA Proceedings.

99. The Company also files GST/HST returns on a monthly basis and the Company's Business involves the ongoing payment of GST/HST in the ordinary course.

100. The Company does not maintain directors' and officers' liability insurance. Accordingly, the Directors' Charge is necessary to provide the Company's sole director and officers, if any, with protection against potential post-filing liabilities that may arise during these CCAA Proceedings.

101. The Directors' Charge is crucial to the continued involvement of the Company's sole director and officers, if any, during these CCAA Proceedings by providing them with certainty regarding their potential personal liability.

102. The Company's director and officers, if any, have/has skills, knowledge and expertise, as well as established relationships with various stakeholders, including customers, suppliers, refiners, advisors, CRA and other parties, that are critical to a successful restructuring.

103. The quantum of the Directors' Charge was developed with the assistance and support of Alix, taking into account the anticipated payroll, source deduction, GST/HST and other exposures that may give rise to director or officer (if any) liability for the applicable period.

104. The amount of the Directors' Charge was estimated by the Company, in consultation with the Proposal Trustee, taking into consideration the potential exposure of the Director and Officers for post-filing accrued vacation pay, unpaid wages, unremitted HST and payroll source deductions until the end of the Cash Flow Forecast period.

105. The Company is of the view that the quantum of the Directors' Charge is reasonably necessary at this time to address circumstances that could lead to potential director or officer (if any) liability during the Stay Period.

106. I understand that Alix is supportive of the Directors' Charge and its quantum.

107. I believe that the Directors' Charge is reasonable and appropriate in the circumstances.

**vii. Cash Management System**

108. As described above, the Company operates CAD and USD bank accounts at CIBC and a CAD bank account at RBC. The Company's main operating accounts are the CIBC accounts.

109. The Company's cash management system is centralized through its operating accounts at CIBC. Customer receipts are deposited into the Company's operating accounts. The Company uses funds in those accounts to pay suppliers, operating expenses, payroll, taxes and other business obligations in the ordinary course.

110. The Company also holds physical cash on hand at its head office, which is used to facilitate day-to-day operational needs.

111. Given the nature and scale of the Company's operations through its cash management system, the continued use of the existing cash management system is required and appropriate during these CCAA Proceedings.

112. Continued use of the Company's existing cash management system will minimize disruption to the Business and avoid the need to negotiate and implement alternative banking arrangements at a time when the Company requires stability.

113. I understand that Alix is supportive of this relief.

**viii. Cash Flow and No DIP Financing Sought at this Time**

114. As described above, with the assistance of Alix, the Company has prepared the Cash Flow Forecast.

115. The Cash Flow Forecast reflects the Company's expected receipts and disbursements during the applicable forecast period, including anticipated operating receipts, purchases, payroll, professional fees, tax obligations and other ordinary-course disbursements.

116. Based on the Cash Flow Forecast, and subject to the relief sought in the Initial Order, the Company expects to have sufficient liquidity to operate during the initial stage of the Stay Period.

117. The Company is not seeking approval of debtor-in-possession financing at this time.

118. The Company may seek approval of debtor-in-possession financing or other financing relief at a later stage of these CCAA Proceedings if required.

## **H. CONCLUSION**

119. I believe that the relief sought in the proposed Initial Order is necessary and appropriate in the circumstances. The relief sought will allow the Company to preserve the stability achieved during the NOI Proceedings, continue operating as a going concern, preserve liquidity, address CRA-related issues, protect the Business and the Property and pursue a restructuring path under the supervision of this Court and the Monitor.

120. I swear this affidavit in support of the Company's motion for the Extension and for no other or improper purpose.

**SWORN BEFORE ME** over videoconference this 7<sup>th</sup> day of July, 2026 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely. The affiant is located in Richmond Hill in the Province of Ontario and the commissioner is located in the City of Toronto, in the Province of Ontario.



---

**HUGH MCHENRY**  
Commissioner for Taking Affidavits  
(or as may be)

Signed by:



4EA3EF3EFD35414...

---

**EROL AKSU**

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF 999 GOLD DEPOT (CANADA) LIMITED**

Court No.: 31-3367471  
Estate No.: 31-3367471

Court File No: BK-26-03367471-0031

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT TORONTO

**AFFIDAVIT OF EROL AKSU  
(sworn July 7, 2026)**

**CHAITONS LLP**

Barristers and Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton (LSO No. 21592F)**

Tel: (416) 218-1129  
E-mail: harvey@chaitons.com

**Danish Afroz (LSO No. 65786B)**

Tel: (416) 218-1137  
E-mail: dafroz@chaitons.com

*Lawyers for 999 Gold Depot (Canada) Limited*

***THIS IS EXHIBIT "A" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "R. M.", is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***



## Profile Report

999 GOLD DEPOT (CANADA) LIMITED as of April 29, 2026

Act	Business Corporations Act
Type	Ontario Business Corporation
Name	999 GOLD DEPOT (CANADA) LIMITED
Ontario Corporation Number (OCN)	1231144
Governing Jurisdiction	Canada - Ontario
Status	Active
Date of Incorporation	April 03, 1997
Registered or Head Office Address	27 Queen Street East, 901, Toronto, Ontario, M5C 2M6, Canada

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

Minimum Number of Directors 1  
Maximum Number of Directors 7

**Active Director(s)**

**Name** AGOP AKSU  
**Address for Service** 5959 Yonge Street, Unit 802, North York, Ontario, M2M 3V7,  
Canada  
**Resident Canadian** No  
**Date Began** April 01, 2023

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

**Active Officer(s)**

There are no active Officers currently on file for this corporation.

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

**Corporate Name History**

**Name**

999 GOLD DEPOT (CANADA) LIMITED

**Effective Date**

April 03, 1997

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

### Active Business Names

This corporation does not have any active business names registered under the Business Names Act in Ontario.

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

### Expired or Cancelled Business Names

This corporation does not have any expired or cancelled business names registered under the Business Names Act in Ontario.

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

## Document List

Filing Name	Effective Date
Archive Document Package	February 24, 2025
CIA - Notice of Change PAF: DAR DIXON	May 03, 2023
Annual Return - 2020 PAF: EROL AKSU - DIRECTOR	May 23, 2021
Annual Return - 2019 PAF: EROL AKSU - DIRECTOR	May 24, 2020
Annual Return - 2018 PAF: EROL AKSU - DIRECTOR	July 07, 2019
Annual Return - 2017 PAF: EROL AKSU - DIRECTOR	June 19, 2018
Annual Return - 2016 PAF: EROL AKSU - DIRECTOR	April 09, 2017
Annual Return - 2015 PAF: EROL AKSU - DIRECTOR	April 30, 2016
Annual Return - 2014 PAF: EROL AKSU - DIRECTOR	April 25, 2015
Annual Return - 2013 PAF: EROL AKSU - DIRECTOR	April 05, 2014
Annual Return - 2012 PAF: EROL AKSU - DIRECTOR	May 11, 2013
Annual Return - 2011 PAF: EROL AKSU - DIRECTOR	April 14, 2012
Annual Return - 2010 PAF: EROL AKSU - DIRECTOR	April 23, 2011

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

Annual Return - 2009 PAF: EROL AKSU - DIRECTOR	June 19, 2010
Annual Return - 2008 PAF: EROL AKSU - DIRECTOR	March 28, 2009
Annual Return - 2007 PAF: EROL AKSU - DIRECTOR	June 07, 2008
Annual Return - 2006 PAF: EROL AKSU - DIRECTOR	March 24, 2007
Annual Return - 2005 PAF: EROL AKSU - DIRECTOR	April 01, 2006
Annual Return - 2004 PAF: EROL AKSU - DIRECTOR	April 30, 2005
Annual Return - 2003 PAF: EROL AKSU - DIRECTOR	March 28, 2004
Annual Return - 2002 PAF: EROL AKSU - DIRECTOR	April 08, 2003
Annual Return - 2001 PAF: EROL AKSU - DIRECTOR	June 30, 2002
Annual Return - 2000 PAF: EROL AKSU	April 24, 2001
BCA - Articles of Incorporation	April 03, 1997

All "PAF" (person authorizing filing) information is displayed exactly as recorded in the Ontario Business Registry. Where PAF is not shown against a document, the information has not been recorded in the Ontario Business Registry.

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

*V. Quintanilla W.*

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

***THIS IS EXHIBIT "B" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to read 'Erol Aksu', is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***

REGISTERED

May 27, 2022

**999 GOLD DEPOT (CANADA) LIMITED**  
901-27 QUEEN ST E  
TORONTO, ON M5C 2M6

Dear Erol Aksu:

**Subject: Conclusion of the audit of your GST/HST returns for the period  
from 2013-04-01 to 2019-08-31**  
**Account number: 88745 5749 RT0001**  
**Case number: 97599731**

This correspondence is to inform you that we have concluded our audit of the GST/HST returns of 999 Gold Depot (Canada) Limited (999). As a result of the audit findings we are proposing to reassess the GST/HST returns of 999. The results of the proposed reassessment are shown on a period-by-period basis on the enclosed *ITC Adjustments* and *Amounts Collected on Account of Tax Adjustments* working papers.

The total audit changes are as follows: line 105 of your returns are being changed by a total of **\$36,286.08**, and line 108 of your returns are being changed by a total of **\$15,658,841.56**. As a result, you may note that **line 109 of your returns are being increased by a total of \$15,695,124**.

The line 105 variance has resulted from unreported amounts collected as or on account of tax, while the line 108 variance has resulted from ITCs that were associated with a carousel scheme in which 999 was a willing participant in, as explained below.

The transactions between 999 and the other carousel scheme participants were not in the course of commercial activity. **This scheme involved the use of accommodation invoices, sham documents, and transactions in debased pure gold.** Since these transactions were not in the course of commercial activity, and because your ITC claims are supported by sham documents, you cannot claim ITCs for any amounts on account of tax that may have been paid to your suppliers of debased pure gold.

To claim ITCs that are not in respect of commercial activity is contrary to Subsection 169(1) of the Excise Tax Act (ETA). In addition, audit has found that the purchase invoices submitted to audit are false documents that misrepresent the rights and obligations of 999 and its purported suppliers. These invoices were not valid, and are considered to be sham documents that do not meet the criteria set forth under Subsection 169(4) of the ETA.

Although the carousel transactions were not considered to be in commercial activity, your records show that you did collect amounts as or on account of tax as defined under Subsection 225(1) of the ETA; consequently, **line 105 of your returns will be reassessed for an additional \$36,283.00.**

We are applying penalties against the increase to net GST/HST payable; these amounts have been specified in the *Summary of Audit Adjustments*. Section 285 of the *Excise Tax Act* requires the

application of a penalty in cases where a registrant knowingly, or in circumstances amounting to gross negligence, participates in or makes a false statement or omission in a return, form, certificate, statement, or answer. The penalty under section 285 of the *Excise Tax Act* is equal to the greater of \$250 and 25% of the amount by which the net tax or tax payable is understated, or rebate is overstated. **The total amount of penalties being proposed for all periods is \$3,923,781.16.**

If you would like to object to the reassessment, you must file a notice of objection in the prescribed form and manner, with the Minister, within 90 days of the date of the notice of reassessment. You can find general information about objections and appeals at [canada.ca/cra-complaints-disputes](http://canada.ca/cra-complaints-disputes).

Please note, if you do not contact us within 30 days of the date of this letter, we will reassess your GST/HST returns as proposed, including penalties.

If you have any questions, please contact me via telephone at 1-833-772-0235; alternatively, you may reach my team leader, Tracey Hatcher, by calling 1-709-727-7328.

Sincerely,



Nelson Greenleaves  
Audit Division  
St. John's Office

Telephone: 1-833-772-0235 or 709-693-3832  
Facsimile: 709 - 772-5263

Office address: 290 Empire Ave.  
St. John's, NL A1B 3Z1

Mailing address: PO Box 12071 Stn. A  
St. John's, NL A1B 3Z1

Website: [canada.ca](http://canada.ca)

*Enclosure(s)*

<b>Registrant:</b>	999 Gold Depot (Canada) Limited	<b>Auditor:</b>	Nelson Greenleaves
<b>Account:</b>	887455749 RT0001	<b>Date:</b>	26-May-22
<b>Audit Period:</b>	2013-04-01 to 2019-08-31	<b>W/P #:</b>	4902
		<b>Subject:</b>	Amounts Collected on Account of Tax Adjustments

---

**Purpose:** To summarize amounts collected on account of tax determined throughout the audit.

**Method:** Calculate amounts collected on account of tax determined in the audit.  
Reference appropriate legislation under the Excise Tax Act (ETA).

**Findings:** It was determined in the audit that 999 had charged GST/HST (amounts collected on account of tax) to customers on invoices for exempt supplies. While generally no tax would be required, as it was invoiced to the customers, the amounts were required to be collected and remitted to the Crown. 999 had never included those invoiced GST/HST amounts in their ledgers, and therefore their GST/HST returns.

Subsection 222(1) of the Excise Tax Act provides that every person who collects an amount as or on account of tax is deemed to hold the amount in trust for Her Majesty in right of Canada.

You are required under subsection 225(1) of the Act, to report all the amounts that became collectible and all other amounts collected as or on account of tax. Based on information available to our office you collected amounts as or on account of tax in the periods under review. We are assessing the following amounts:

**Amounts Collected on Account of Tax Adjustments**

<b>Filer Type</b>	<b>Period End</b>	<b>Returns filed</b>	<b>Adjustments</b>	<b>Revised Amounts</b>	<b>ETA</b>
monthly	2019-06-30	\$32,500.95	\$36,283.08	\$68,784.03	225(1)
<b>Total</b>		\$32,500.95	\$36,283.08	\$68,784.03	

**Conclusion:** The 2019-06-01 to 2019-06-30 period will be adjusted to include \$36,283.08 of GST/HST collected/collectible (amounts on account of tax) that the registrant did not include in their GST/HST return.

**Purpose:** As a result of audit findings it is necessary to present the resulting ITC adjustments; the purpose of this working paper is to present the adjustments on a period-by-period basis.

**Method:** Present ITC adjustments determined in the audit.  
 Reference appropriate legislation under the Excise Tax Act (ETA).

**Findings/Conclusion:** Since the audit has resulted in findings that 999 has made ITC claims that were not in respect of commercial activities, and since Subsection 169(1) of the ETA provides that all ITC claims must be in respect of commercial activities, audit will adjust the registrant's ITC claims as presented below.

The resulting **total adjustment to ITCs is -\$15,658,841.56**; as noted above these changes are being made in accordance with Subsection 169(1) of the ETA. These have been carried to WP #4910 for summarization.

The adjustments are presented on a vendor basis in WP4903-1 below, while 999's original ITC are presented in WP4903-2.

**ITC Adjustments**

Filer Type	Period End	ITC Claim	ITC Change	Revised ITC	ETA
monthly	2013-04-30	\$144,416.72	-\$ 1,276.19	\$143,140.53	169(1)
monthly	2013-05-31	\$168,482.75	-\$ 35,663.89	\$132,818.86	169(1)
monthly	2013-06-30	\$667,821.19	-\$ 59,299.78	\$608,521.41	169(1)
monthly	2013-07-31	\$144,326.36	-\$ 61,988.71	\$82,337.65	169(1)
monthly	2013-08-31	\$135,521.93	-\$ 64,516.92	\$71,005.01	169(1)
monthly	2013-09-30	\$188,691.08	-\$ 84,696.68	\$103,994.40	169(1)
monthly	2013-10-31	\$223,390.85	-\$ 137,932.08	\$85,458.77	169(1)
monthly	2013-11-30	\$201,575.88	-\$ 151,247.83	\$50,328.05	169(1)
monthly	2013-12-31	\$225,782.33	-\$ 170,477.41	\$55,304.92	169(1)
monthly	2014-01-31	\$214,944.19	-\$ 134,834.14	\$80,110.05	169(1)
monthly	2014-02-28	\$203,490.47	-\$ 140,627.36	\$62,863.11	169(1)

**GST/HST Audit of 999 Gold Depot (Canada) Limited**  
**Audit period: 2013-04-01 to 2019-08-31**

**WP4903: Input Tax Credit Revisions**

**PROTECTED B**

monthly	2014-03-31	\$209,979.99	-\$ 131,372.14	\$78,607.85	169(1)
monthly	2014-04-30	\$348,268.37	-\$ 268,234.23	\$80,034.14	169(1)
monthly	2014-05-31	\$379,841.32	-\$ 312,955.77	\$66,885.55	169(1)
monthly	2014-06-30	\$426,587.41	-\$ 324,856.69	\$101,730.72	169(1)
monthly	2014-07-31	\$110,627.67	-\$ 24,852.29	\$85,775.38	169(1)
monthly	2014-08-31	\$58,727.30	\$ -	\$58,727.30	169(1)
monthly	2014-09-30	\$405,350.70	-\$ 20,486.00	\$384,864.70	169(1)
monthly	2014-10-31	\$74,814.19	\$ -	\$74,814.19	169(1)
monthly	2014-11-30	\$85,342.07	-\$ 11,154.94	\$74,187.13	169(1)
monthly	2014-12-31	\$109,988.76	-\$ 42,644.68	\$67,344.08	169(1)
monthly	2015-01-31	\$201,447.10	-\$ 101,027.04	\$100,420.06	169(1)
monthly	2015-02-28	\$164,533.38	-\$ 95,397.75	\$69,135.63	169(1)
monthly	2015-03-31	\$193,793.79	-\$ 138,469.71	\$55,324.08	169(1)
monthly	2015-04-30	\$207,103.00	-\$ 140,799.86	\$66,303.14	169(1)
monthly	2015-05-31	\$211,295.00	-\$ 156,969.06	\$54,325.94	169(1)
monthly	2015-06-30	\$1,252,052.40	-\$ 142,839.85	\$1,109,212.55	169(1)
monthly	2015-07-31	\$113,488.60	-\$ 33,572.67	\$79,915.93	169(1)
monthly	2015-08-31	\$1,105,459.00	\$ -	\$1,105,459.00	169(1)
monthly	2015-09-30	\$261,335.60	-\$ 184,476.60	\$76,859.00	169(1)
monthly	2015-10-31	\$275,778.50	-\$ 205,375.46	\$70,403.04	169(1)
monthly	2015-11-30	\$227,098.80	-\$ 155,363.18	\$71,735.62	169(1)
monthly	2015-12-31	\$220,071.20	-\$ 123,603.14	\$96,468.06	169(1)
monthly	2016-01-31	\$261,378.10	-\$ 161,683.12	\$99,694.98	169(1)
monthly	2016-02-29	\$261,127.60	-\$ 166,071.24	\$95,056.36	169(1)
monthly	2016-03-31	\$293,015.50	-\$ 221,112.58	\$71,902.92	169(1)
monthly	2016-04-30	\$242,317.40	-\$ 168,158.79	\$74,158.61	169(1)
monthly	2016-05-31	\$381,105.30	-\$ 299,548.24	\$81,557.06	169(1)
monthly	2016-06-30	\$350,351.40	-\$ 250,816.73	\$99,534.67	169(1)
monthly	2016-07-31	\$374,499.80	-\$ 262,760.90	\$111,738.90	169(1)
monthly	2016-08-31	\$453,124.20	-\$ 367,804.42	\$85,319.78	169(1)
monthly	2016-09-30	\$498,728.30	-\$ 388,203.74	\$110,524.56	169(1)
monthly	2016-10-31	\$355,445.60	-\$ 278,166.78	\$77,278.82	169(1)
monthly	2016-11-30	\$410,323.60	-\$ 315,015.04	\$95,308.56	169(1)
monthly	2016-12-31	\$306,965.50	-\$ 238,654.10	\$68,311.40	169(1)

**GST/HST Audit of 999 Gold Depot (Canada) Limited**  
**Audit period: 2013-04-01 to 2019-08-31**

**WP4903: Input Tax Credit Revisions**

**PROTECTED B**

monthly	2017-01-31	\$486,994.40	-\$ 447,806.51	\$39,187.89	169(1)
monthly	2017-02-28	\$469,233.50	-\$ 375,140.12	\$94,093.38	169(1)
monthly	2017-03-31	\$520,668.50	-\$ 392,167.07	\$128,501.43	169(1)
monthly	2017-04-30	\$253,830.30	-\$ 158,210.25	\$95,620.05	169(1)
monthly	2017-05-31	\$288,940.20	-\$ 229,043.91	\$59,896.29	169(1)
monthly	2017-06-30	\$273,486.80	-\$ 175,262.54	\$98,224.26	169(1)
monthly	2017-07-31	\$241,031.70	-\$ 155,306.78	\$85,724.92	169(1)
monthly	2017-08-31	\$417,959.40	-\$ 331,940.16	\$86,019.24	169(1)
monthly	2017-09-30	\$161,536.90	-\$ 85,659.71	\$75,877.19	169(1)
monthly	2017-10-31	\$242,269.00	-\$ 101,314.99	\$140,954.01	169(1)
monthly	2017-11-30	\$276,332.00	-\$ 160,887.89	\$115,444.11	169(1)
monthly	2017-12-31	\$287,157.50	-\$ 199,493.50	\$87,664.00	169(1)
monthly	2018-01-31	\$478,434.90	-\$ 327,125.08	\$151,309.82	169(1)
monthly	2018-02-28	\$397,617.10	-\$ 302,522.81	\$95,094.29	169(1)
monthly	2018-03-31	\$436,369.30	-\$ 302,261.12	\$134,108.18	169(1)
monthly	2018-04-30	\$381,904.00	-\$ 298,743.31	\$83,160.69	169(1)
monthly	2018-05-31	\$521,222.10	-\$ 427,919.22	\$93,302.88	169(1)
monthly	2018-06-30	\$511,810.30	-\$ 428,478.23	\$83,332.07	169(1)
monthly	2018-07-31	\$577,118.20	-\$ 487,975.78	\$89,142.42	169(1)
monthly	2018-08-31	\$425,861.90	-\$ 347,548.63	\$78,313.27	169(1)
monthly	2018-09-30	\$361,517.90	-\$ 307,121.07	\$54,396.83	169(1)
monthly	2018-10-31	\$533,232.10	-\$ 408,456.18	\$124,775.92	169(1)
monthly	2018-11-30	\$562,862.90	-\$ 344,170.71	\$218,692.19	169(1)
monthly	2018-12-31	\$560,715.50	-\$ 452,526.82	\$108,188.68	169(1)
monthly	2019-01-31	\$336,456.20	-\$ 181,521.62	\$154,934.58	169(1)
monthly	2019-02-28	\$297,340.70	-\$ 199,410.02	\$97,930.68	169(1)
monthly	2019-03-31	\$329,590.00	-\$ 206,586.55	\$123,003.45	169(1)
monthly	2019-04-30	\$425,140.20	-\$ 319,026.27	\$106,113.93	169(1)
monthly	2019-05-31	\$445,974.10	-\$ 357,891.45	\$88,082.65	169(1)
monthly	2019-06-30	\$453,839.80	-\$ 238,576.25	\$215,263.55	169(1)
monthly	2019-07-31	\$227,144.84	-\$ 93,183.36	\$133,961.48	169(1)
monthly	2019-08-31	\$157,656.80	-\$ 40,555.92	\$117,100.88	169(1)
<b>Total</b>		<b>\$25,691,059.24</b>	<b>-\$15,658,841.56</b>	<b>\$10,032,217.68</b>	

**Registrant:** 999 Gold Depot (Canada) Limited    **Auditor:** Nelson Greenleaves  
**Account:** 887455749 RT0001    **Date:** 26-May-22  
**Audit Period:** 2013-04-01 to 2019-08-31    **W/P #:** 4910  
**Subject:** Summary of Adjustments

**Purpose:** To summarize all adjustments and penalties in the audit.

**Method:** To summarize adjustments to the GST/HST returns of 999 Gold Depot (Canada) Limited arising out of audit case 9759971.

**Findings:**

Period End	Adjustments				Penalties	Total
	Sales	Amounts Collected on Account of Tax	ITCs	Net	285	
2013-04-30	\$0.00	\$0.00	\$1,276.19	\$1,276.19	\$319.05	\$1,595.24
2013-05-31	\$0.00	\$0.00	\$35,663.89	\$35,663.89	\$8,915.97	\$44,579.86
2013-06-30	\$0.00	\$0.00	\$59,299.78	\$59,299.78	\$14,824.95	\$74,124.73
2013-07-31	\$0.00	\$0.00	\$61,988.71	\$61,988.71	\$15,497.18	\$77,485.89
2013-08-31	\$0.00	\$0.00	\$64,516.92	\$64,516.92	\$16,129.23	\$80,646.15
2013-09-30	\$0.00	\$0.00	\$84,696.68	\$84,696.68	\$21,174.17	\$105,870.85
2013-10-31	\$0.00	\$0.00	\$137,932.08	\$137,932.08	\$34,483.02	\$172,415.10
2013-11-30	\$0.00	\$0.00	\$151,247.83	\$151,247.83	\$37,811.96	\$189,059.79
2013-12-31	\$0.00	\$0.00	\$170,477.41	\$170,477.41	\$42,619.35	\$213,096.76
2014-01-31	\$0.00	\$0.00	\$134,834.14	\$134,834.14	\$33,708.54	\$168,542.68
2014-02-28	\$0.00	\$0.00	\$140,627.36	\$140,627.36	\$35,156.84	\$175,784.20
2014-03-31	\$0.00	\$0.00	\$131,372.14	\$131,372.14	\$32,843.04	\$164,215.18
2014-04-30	\$0.00	\$0.00	\$268,234.23	\$268,234.23	\$67,058.56	\$335,292.79
2014-05-31	\$0.00	\$0.00	\$312,955.77	\$312,955.77	\$78,238.94	\$391,194.71
2014-06-30	\$0.00	\$0.00	\$324,856.69	\$324,856.69	\$81,214.17	\$406,070.86
2014-07-31	\$0.00	\$0.00	\$24,852.29	\$24,852.29	\$6,213.07	\$31,065.36
2014-08-31	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

PROTECTED B

2014-09-30	\$0.00	\$0.00	\$20,486.00	\$20,486.00	\$5,121.50	\$25,607.50
2014-10-31	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2014-11-30	\$0.00	\$0.00	\$11,154.94	\$11,154.94	\$2,788.74	\$13,943.68
2014-12-31	\$0.00	\$0.00	\$42,644.68	\$42,644.68	\$10,661.17	\$53,305.85
2015-01-31	\$0.00	\$0.00	\$101,027.04	\$101,027.04	\$25,256.76	\$126,283.80
2015-02-28	\$0.00	\$0.00	\$95,397.75	\$95,397.75	\$23,849.44	\$119,247.19
2015-03-31	\$0.00	\$0.00	\$138,469.71	\$138,469.71	\$34,617.43	\$173,087.14
2015-04-30	\$0.00	\$0.00	\$140,799.86	\$140,799.86	\$35,199.97	\$175,999.83
2015-05-31	\$0.00	\$0.00	\$156,969.06	\$156,969.06	\$39,242.27	\$196,211.33
2015-06-30	\$0.00	\$0.00	\$142,839.85	\$142,839.85	\$35,709.96	\$178,549.81
2015-07-31	\$0.00	\$0.00	\$33,572.67	\$33,572.67	\$8,393.17	\$41,965.84
2015-08-31	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2015-09-30	\$0.00	\$0.00	\$184,476.60	\$184,476.60	\$46,119.15	\$230,595.75
2015-10-31	\$0.00	\$0.00	\$205,375.46	\$205,375.46	\$51,343.87	\$256,719.33
2015-11-30	\$0.00	\$0.00	\$155,363.18	\$155,363.18	\$38,840.80	\$194,203.98
2015-12-31	\$0.00	\$0.00	\$123,603.14	\$123,603.14	\$30,900.79	\$154,503.93
2016-01-31	\$0.00	\$0.00	\$161,683.12	\$161,683.12	\$40,420.78	\$202,103.90
2016-02-29	\$0.00	\$0.00	\$166,071.24	\$166,071.24	\$41,517.81	\$207,589.05
2016-03-31	\$0.00	\$0.00	\$221,112.58	\$221,112.58	\$55,278.15	\$276,390.73
2016-04-30	\$0.00	\$0.00	\$168,158.79	\$168,158.79	\$42,039.70	\$210,198.49
2016-05-31	\$0.00	\$0.00	\$299,548.24	\$299,548.24	\$74,887.06	\$374,435.30
2016-06-30	\$0.00	\$0.00	\$250,816.73	\$250,816.73	\$62,704.18	\$313,520.91
2016-07-31	\$0.00	\$0.00	\$262,760.90	\$262,760.90	\$65,690.23	\$328,451.13
2016-08-31	\$0.00	\$0.00	\$367,804.42	\$367,804.42	\$91,951.11	\$459,755.53
2016-09-30	\$0.00	\$0.00	\$388,203.74	\$388,203.74	\$97,050.94	\$485,254.68
2016-10-31	\$0.00	\$0.00	\$278,166.78	\$278,166.78	\$69,541.70	\$347,708.48
2016-11-30	\$0.00	\$0.00	\$315,015.04	\$315,015.04	\$78,753.76	\$393,768.80
2016-12-31	\$0.00	\$0.00	\$238,654.10	\$238,654.10	\$59,663.53	\$298,317.63
2017-01-31	\$0.00	\$0.00	\$447,806.51	\$447,806.51	\$111,951.63	\$559,758.14
2017-02-28	\$0.00	\$0.00	\$375,140.12	\$375,140.12	\$93,785.03	\$468,925.15
2017-03-31	\$0.00	\$0.00	\$392,167.07	\$392,167.07	\$98,041.77	\$490,208.84
2017-04-30	\$0.00	\$0.00	\$158,210.25	\$158,210.25	\$39,552.56	\$197,762.81
2017-05-31	\$0.00	\$0.00	\$229,043.91	\$229,043.91	\$57,260.98	\$286,304.89

2017-06-30	\$0.00	\$0.00	\$175,262.54	\$175,262.54	\$43,815.64	\$219,078.18
2017-07-31	\$0.00	\$0.00	\$155,306.78	\$155,306.78	\$38,826.70	\$194,133.48
2017-08-31	\$0.00	\$0.00	\$331,940.16	\$331,940.16	\$82,985.04	\$414,925.20
2017-09-30	\$0.00	\$0.00	\$85,659.71	\$85,659.71	\$21,414.93	\$107,074.64
2017-10-31	\$0.00	\$0.00	\$101,314.99	\$101,314.99	\$25,328.75	\$126,643.74
2017-11-30	\$0.00	\$0.00	\$160,887.89	\$160,887.89	\$40,221.97	\$201,109.86
2017-12-31	\$0.00	\$0.00	\$199,493.50	\$199,493.50	\$49,873.38	\$249,366.88
2018-01-31	\$0.00	\$0.00	\$327,125.08	\$327,125.08	\$81,781.27	\$408,906.35
2018-02-28	\$0.00	\$0.00	\$302,522.81	\$302,522.81	\$75,630.70	\$378,153.51
2018-03-31	\$0.00	\$0.00	\$302,261.12	\$302,261.12	\$75,565.28	\$377,826.40
2018-04-30	\$0.00	\$0.00	\$298,743.31	\$298,743.31	\$74,685.83	\$373,429.14
2018-05-31	\$0.00	\$0.00	\$427,919.22	\$427,919.22	\$106,979.81	\$534,899.03
2018-06-30	\$0.00	\$0.00	\$428,478.23	\$428,478.23	\$107,119.56	\$535,597.79
2018-07-31	\$0.00	\$0.00	\$487,975.78	\$487,975.78	\$121,993.95	\$609,969.73
2018-08-31	\$0.00	\$0.00	\$347,548.63	\$347,548.63	\$86,887.16	\$434,435.79
2018-09-30	\$0.00	\$0.00	\$307,121.07	\$307,121.07	\$76,780.27	\$383,901.34
2018-10-31	\$0.00	\$0.00	\$408,456.18	\$408,456.18	\$102,114.05	\$510,570.23
2018-11-30	\$0.00	\$0.00	\$344,170.71	\$344,170.71	\$86,042.68	\$430,213.39
2018-12-31	\$0.00	\$0.00	\$452,526.82	\$452,526.82	\$113,131.71	\$565,658.53
2019-01-31	\$0.00	\$0.00	\$181,521.62	\$181,521.62	\$45,380.41	\$226,902.03
2019-02-28	\$0.00	\$0.00	\$199,410.02	\$199,410.02	\$49,852.51	\$249,262.53
2019-03-31	\$0.00	\$0.00	\$206,586.55	\$206,586.55	\$51,646.64	\$258,233.19
2019-04-30	\$0.00	\$0.00	\$319,026.27	\$319,026.27	\$79,756.57	\$398,782.84
2019-05-31	\$0.00	\$0.00	\$357,891.45	\$357,891.45	\$89,472.86	\$447,364.31
2019-06-30	\$0.00	\$36,283.08	\$238,576.25	\$274,859.33	\$68,714.83	\$343,574.16
2019-07-31	\$0.00	\$0.00	\$93,183.36	\$93,183.36	\$23,295.84	\$116,479.20
2019-08-31	\$0.00	\$0.00	\$40,555.92	\$40,555.92	\$10,138.98	\$50,694.90
<b>Total</b>	<b>\$0.00</b>	<b>\$36,283.08</b>	<b>\$15,658,841.56</b>	<b>\$15,695,124.64</b>	<b>\$3,923,781.16</b>	<b>\$19,618,905.80</b>

**Conclusion:** Summary of adjustments and penalties.

***THIS IS EXHIBIT "C" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL AKSU', is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***

RAPPORT DE VÉRIFICATION DE TRANSMISSION

HEURE : 06/16/2022 14:32  
NOM : OSLER  
FAX : 5149048101  
TÉL : 5149048100  
#SER. : 000F9V678636

DATE, HEURE	06/16 14:31
NUMÉRO/NOM FAX	917097726263
DURÉE	00:00:44
PAGE(S)	03
RÉSULTAT	OK
MODE	STANDARD
	MCE

Osler, Hoskin & Harcourt LLP  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

OSLER

Montréal

Toronto

Calgary

Ottawa

Vancouver

New York

## Facsimile transmission

To:	City:	Telephone:	Fax:
Name/Company			
Nelson Greenleaves	St. John's		709.772.5263
Canada Revenue Agency			
Audit Division			

Mrs. Tracey Hatcher  
Team Leader

From:	Ref No.:	Date:	No. of pages:
Louis Tassé	/ 5633	June 16, 2022	3 (including cover)
514.904.8170			
ltasse@osler.com			

999 Gold Depot (Canada) Limited (the "Taxpayer")  
BN 887455749  
Case Number 97599731

Osler, Hoskin & Harcourt LLP  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

OSLER

Montréal

June 16, 2022

Louis Tassé  
Direct Dial: 514.904.8170  
ltasse@osler.com

Toronto

Calgary

Ottawa

**By Facsimile (709.772.5263)**

Vancouver

Nelson Greenleaves  
Canada Revenue Agency  
Audit Division  
St. John's Office  
290 Empire Ave.  
St. John's, NL A1B 3Z1

New York

Dear Sir:

**999 Gold Depot (Canada) Limited (the “Taxpayer”)  
BN 887455749  
Case Number 97599731**

Further to our telephone conversation of June 13, 2022, wherein you orally provided me with the Canada Revenue Agency’s (“CRA”) position, we would like to confirm that our understanding of the CRA’s position is accurate. During such call, you explained the following:

1. CRA believes that the Taxpayer was in collusion with a number of suppliers in the context of an alleged carousel scheme that involved the debasing of pure gold to change the tax status of the supplies.
2. CRA considers that the invoices issued by such suppliers were invoices of accommodation and sham documents.
3. CRA considers that an invoice of accommodation is an invoice that is issued in relation to a false transaction.
4. CRA considers that a sham document is a document where the rights and obligations of the parties are misrepresented. In the context of the alleged carousel scheme, it is the CRA’s position that the invoices issued by the suppliers were sham documents, as the parties did not intend to enter into commercial transactions and the real reason for the transactions was to participate in the alleged carousel scheme.
5. CRA considers that the Taxpayer’s benefit for its participation in this alleged carousel scheme was to earn a profit by increasing its business and earning a margin on the resale of the gold once refined.

6. CRA finds it plausible that the same gold was coming back as part of the alleged carousel scheme but does not have any evidence to that effect given that “there is no way to trace the gold once it is melted”.
7. CRA considers that given the volume of gold purchased from the suppliers at issue, the Taxpayer was aware that debasing of gold was occurring, or it failed to take steps to establish that it was not occurring.

As mentioned above, we would appreciate a confirmation that our understanding of the CRA’s position is correct, which will allow us to specifically address the findings of the CRA. If such position is incorrect or incomplete in any way, kindly confirm the corrections and additions that should be made so that we can address this in our response.


We would also ask for the factual basis that the CRA is relying on to assert the positions set out above, as these assertions contain very serious allegations. As discussed, we also require a copy of your working papers in relation to the transactions that you have identified as being part of the alleged carousel scheme, to allow us to confirm the identity of the suppliers and the amounts involved.

As mentioned during our call, we would like an extension of time to respond to your assessment proposal. However, in order to ascertain the additional time that will be needed, we will first require a confirmation of our understanding of the basis of the CRA’s position and the above noted working papers, that our client will need in order to respond to the very serious allegations raised by the CRA and to pull out the relevant documentation in support of its position.

Do not hesitate to contact the undersigned should you have any questions with regards to this letter.

Regards,

Osler, Hoskin & Harcourt LLP



Louis Tassé  
Partner  
LT: jp

Cc Mr. Erol Aksu  
999 Gold Depot (Canada) Limited  
Mrs. Tracey Hatcher  
Team Leader (CRA)

***THIS IS EXHIBIT "D" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL AKSU', is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***



Canada Revenue  
Agency

Agence du revenu  
du Canada

PROTECTED B

July 7, 2022

**REGISTERED**

**999 GOLD DEPOT (CANADA) LIMITED**  
901-27 QUEEN ST E  
TORONTO, ON M5C 2M6

Dear Erol Aksu:

**Subject: Conclusion of the audit of your GST/HST returns for the period  
from 2013-04-01 to 2019-08-31**  
**Account number: 88745 5749 RT0001**  
**Case number: 97599731**

This correspondence is in response to correspondence received from the authorized representative of 999 Gold Depot (Canada) Limited (999) in a letter dated June 16, 2022. Note that a copy of this letter is being forwarded to your authorized representative.

In the above-referenced correspondence, clarification was requested regarding the Minister's assessing position and the factual basis of this position. There was also a request for a list of suppliers that 999 Gold Depot (Canada) Limited (999) had engaged with in conducting the carousel scheme, thus resulting in proposed denial of ITCs.

To provide the assessing position, and to provide the factual basis of that position, we have attached "Appendix A: Assessing Position – Carousel Scheme." Additional details regarding the ITCs proposed to be denied can be found in the attached WP4903 series of working papers.

In the event that representations will be made, please ensure that any submissions are received no later than 30 days from the date of this letter.

Please note that any representations received by the close of business on August 8, 2022 will be considered prior to reassessing the GST/HST returns.

**Canada**

If there are any questions, please contact me via telephone at 1-833-772-0235; alternatively, my team leader, Tracey Hatcher, can be reached by calling 1-709-727-7328.

Sincerely,



Nelson Greenleaves  
Audit Division  
St. John's Office

Telephone: 1-833-772-0235 or 709-693-3832  
Facsimile: 709 - 772-5263

Office address: 290 Empire Ave.  
St. John's, NL A1B 3Z1  
Mailing address: PO Box 12071 Stn. A  
St. John's, NL A1B 3Z1

Website: [canada.ca](http://canada.ca)

Cc : *Louis Tassé*

## **Appendix A: Assessing Position – Carousel Scheme**

An objective review of audit evidence has led to the conclusion that 999 was a willing participant in a scrap gold carousel scheme. The scheme involved a highly sophisticated and well organized network of participants (the participants), many of whom worked in collusion to deceive the Minister and benefit from appropriated amounts that were collected as or on account of GST/HST.

In the tax Court of Canada decision in *Cherniak v. The Queen*, Justice Hogan states that in a carousel scheme “The GST is drawn out of the system on the basis of fictitious ... sales of zero rated supplies that allow the ...seller to receive large refunds in connection with tax that was never remitted in the first instance. Numerous buyers and sellers are inserted into the transaction flow to mask what is really going on.” Hogan further stated that the parties “participated with others in what amounted to be paper transactions as part of an elaborate ruse to defraud the government of tax revenue”. Engaging in transactions intended to deceive and divert tax revenue from the Minister is in direct contravention of the spirit of the ETA. As a result ITCs will be denied per subsection 169(1) of the ETA as they are not claimed in respect of bona fide commercial activity.

### **Functionality of the Carousel Scheme**

The participants obtained unwarranted GST/HST refunds by producing scrap gold (taxable at 13% due to purity level) from GST/HST exempt or zero-rated pure gold bars. The scrap gold was produced by adding alloys or a small quantity of legitimate scrap gold to the exempt or zero-rated gold bars, thus reducing the purity level below the 99.5% purity threshold. The resulting artificial scrap gold is then moved through a series of colluding parties; the amounts collected as or on account of GST/HST go unremitted, thus creating leakage from the GST/HST system.

### **A Carousel Scheme Involving 999**

Our analysis of scrap gold purchased by 999 included testing of the purity and volumetric characteristics of 999 scrap gold transactions, consideration of irregularities and inconsistencies exhibited by 999’s purported suppliers,

analysis of supply chain complexity, and a review of evidence surrounding the appropriation of amounts collected as or on account of tax. Based upon the audit evidence, it has been concluded that the scrap gold purchased by 999 from the participants in the scheme is comprised primarily of debased pure gold created perpetuate a carousel scheme.

#### **999 Awareness and Complicity**

The analysis referenced above has also led to the conclusion that 999 was both aware of and willfully participated in the scheme and, in fact, played the key role in the scheme. 999's role in the scheme was multi-faceted; they acquired and sent the artificial scrap gold for refinement, they filed GST/HST returns which included millions of dollars of ITCs to which they were knowingly unentitled, and they knowingly distributed the GST/HST refunds and refined metals to participants in the scheme.

999 may deny any awareness of the scheme, however there is a substantial body of evidence that its director, Erol Aksu, knew that it was occurring and was, at a minimum, willfully blind (refer to analysis of willful blindness below). Despite his awareness and/or willful blindness, Aksu did not take any steps to mitigate the scheme; in fact, he supported it.

The participants relied upon 999, as the zero-rater, to file credit returns and to distribute the funds to vendors. 999's role in the scheme was instrumental and integral to the scheme, moreover, without them the scheme would not have occurred. As the zero-rater, 999 assumed substantial risks in association with the scheme since they were exposed to the accounting and legal risk, the risk of losing legitimate business, and the risk associated with GST/HST reassessment. Despite the associated risks, 999 willingly participated in the scheme and generated millions in business profits as a result.

It has been concluded, based upon an objective review of the evidence, that Erol Aksu was personally aware of the scheme and 999's role in the scheme. Audit has arrived at this conclusion due to the following factors:

- By Aksu's own admission, he is highly knowledgeable about the gold industry and 999's business operations. This knowledge and awareness has been refined over many years in the industry; in fact, Aksu has attested to having been involved in the gold industry since he was 4 years of age.
- 999's records show that they were aware of their largest vendor's involvement in the scheme by late 2016, yet they continued to do business

with other parties associated with this vendor until the GST/HST audit commenced. As such, it is unreasonable for Aksu to assert that he was unaware of the red flags observed by audit.

- Most of 999's largest vendors provided gold with purity levels that exceeded the expected purity level for the market.
- Similarly, the vendors noted above provided abnormally high volumes of gold; this is particularly anomalous since their operations did not benefit from the marketing, advertising, and promotional campaigns undertaken by comparable entities.
- 999 realized a material increase in sales in all years under audit prior to 2019 (when the audit commenced). Since the commencement of the audit, sales have decreased by 36% ; this decrease is directly associated with the reduction in purchases from the participants in the scheme
- Further to the sales trends noted above, audit has observed an even more troubling trend with 999's ITC claims: During the audit period, ITCs increased by an average of 28% per year, but fell by 53% in 2019 (year of audit commencement)
  - It is unreasonable for 999 to assert that they were unaware of the dramatic increases in ITC claims, and the proportionate increases in their GST/HST refunds.
  - It is also unreasonable for 999 to assert that they would not have had cause to question, investigate, and potentially terminate the business relationship with those distributing exceedingly high volumes of purported scrap gold

In the event that 999 and/or its Director are found not to have been willing participants in the scheme or are considered not to have colluded with the known participants, then it is the position of audit that they were, at a minimum, willfully blind.

## Willful blindness

---

Although the audit evidence has led to the conclusion that 999 was a willing participant in the carousel scheme, it is necessary to consider the possibility that 999 was not complicit. As noted above, if this can be proven, it is the position of audit that 999 and its Director, Erol Aksu, were willfully blind.

In its capacity as the direct refinery feeder and zero-rater in this scheme, 999's involvement was integral to the operation of the scheme. It is because of 999's involvement or lack of due diligence that the GST/HST net tax refunds were paid to other participants in the scheme. 999 has failed in its capacity as a purchaser of precious metals to take actions that, if taken, would have mitigated the tax loss realized by the Minister.

To establish willful blindness, two fundamental requirements must be met: 1) There must be a need or a suspicion for an inquiry; and 2) the individual must take deliberate actions to avoid learning of that fact. The absence of obvious actions taken is equivalent to taking deliberate action. Justice Sopinka puts it simply in his writing of the Supreme Court of Canada decisions in *R v. Jorgensen*: "a finding of wilful blindness involves an affirmative answer to the question: did the accused shut his eyes because he knew or strongly suspected that looking would fix him with knowledge?"<sup>1</sup>. While *R v. Jorgensen* and the majority of the jurisprudence comes to us from criminal court cases, Justice Nadon states in *Panini et al V The Queen* "there can be no doubt that the concept of "wilful blindness" is applicable to tax cases."<sup>2</sup> Wilful blindness can be established when it can be determined, on a balance of probabilities, that the taxpayer knew that they were making false statements on their returns but chose not to make further inquiry because they knew or strongly suspected that the answer would prove the statements false.<sup>3</sup>

In consideration of Erol Aksu's extensive background in the gold industry, and his level of knowledge of his business, it is the conclusion of audit that he was, at a minimum, aware of the red flags surrounding the transactions between 999 and its vendors. Any decision by Aksu not to make further enquiry regarding the said transactions was made, not because he did not have grounds to be suspicious, but because he did not wish to know the truth.

In the tax Court of Canada decision in *Cherniak v. The Queen*<sup>4</sup>, Justice Hogan states that in a carousel scheme "The GST is drawn out of the system on the basis of fictitious ... sales of zero-rated supplies that allow the ...seller to receive large refunds in

---

<sup>1</sup> *R. v Jorgensen*, [1995] 4 S.C.R. 55 at 11

<sup>2</sup> *Panini et al V The Queen*, 2006 FCA 224

<sup>3</sup> *Jeff Bradshaw V The Queen*, 2019 TCC 1

<sup>4</sup> *Cherniak v The Queen*, 2015 TCC 53

connection with tax that was never remitted in the first instance. Numerous buyers and sellers are inserted into the transaction flow to mask what is really going on.” Hogan further stated that the parties “participated with others in what amounted to be paper transactions as part of an elaborate ruse to defraud the government of tax revenue”.

The transactions between 999 and the participants in the carousel scheme were structured in such that it was difficult for the Minister to detect the presence of a scheme. Further, 999 and the participants used the guise of bona fide scrap gold transactions to deceive the Minister into paying unwarranted GST/HST refunds that were eventually appropriated by those who carried-out the scheme. The carousel scheme is in violation of the spirit of the ETA.

Based upon the foregoing, audit will deny the ITCs claimed by 999 that are in relation to the participants in the carousel scheme. The denial of ITCs is being made pursuant to subsection 169(1) of the ETA since they are not in respect of commercial activity. The ITCs to be denied have been summarized on the following page.

**Purpose:** As a result of audit findings it is necessary to present the resulting ITC adjustments; the purpose of this working paper is to present the adjustments on a period-by-period basis.

**Method:** Present ITC adjustments determined in the audit.  
 Reference appropriate legislation under the Excise Tax Act (ETA).

**Findings/Conclusion:** Since the audit has resulted in findings that 999 has made ITC claims that were not in respect of commercial activities, and since Subsection 169(1) of the ETA provides that all ITC claims must be in respect of commercial activities, audit will adjust the registrant's ITC claims as presented below.

The resulting **total adjustment to ITCs is -\$15,658,841.56**; as noted above these changes are being made in accordance with Subsection 169(1) of the ETA. These have been carried to WP #4910 for summarization.

The adjustments are presented on a vendor basis in WP4903-1 below, while 999's original ITC are presented in WP4903-2.

ITC Adjustments					
Filer Type	Period End	ITC Claim	ITC Change	Revised ITC	ETA
monthly	2013-04-30	\$144,416.72 -\$	1,276.19	\$145,692.91	169(1)
monthly	2013-05-31	\$168,482.75 -\$	35,663.89	\$204,146.64	169(1)
monthly	2013-06-30	\$667,821.19 -\$	59,299.78	\$727,120.97	169(1)
monthly	2013-07-31	\$144,326.36 -\$	61,988.71	\$206,315.07	169(1)
monthly	2013-08-31	\$135,521.93 -\$	64,516.92	\$200,038.85	169(1)
monthly	2013-09-30	\$188,691.08 -\$	84,696.68	\$273,387.76	169(1)
monthly	2013-10-31	\$223,390.85 -\$	137,932.08	\$361,322.93	169(1)
monthly	2013-11-30	\$201,575.88 -\$	151,247.83	\$352,823.71	169(1)
monthly	2013-12-31	\$225,782.33 -\$	170,477.41	\$396,259.74	169(1)
monthly	2014-01-31	\$214,944.19 -\$	134,834.14	\$349,778.33	169(1)
monthly	2014-02-28	\$203,490.47 -\$	140,627.36	\$344,117.83	169(1)
monthly	2014-03-31	\$209,979.99 -\$	131,372.14	\$341,352.13	169(1)

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

**Audit period: 2013-04-01 to 2019-08-31**

**WP4903: Input Tax Credit Revisions**

**PROTECTED B**

monthly	2014-04-30	\$348,268.37	-\$ 268,234.23	\$616,502.60	169(1)
monthly	2014-05-31	\$379,841.32	-\$ 312,955.77	\$692,797.09	169(1)
monthly	2014-06-30	\$426,587.41	-\$ 324,856.69	\$751,444.10	169(1)
monthly	2014-07-31	\$110,627.67	-\$ 24,852.29	\$135,479.96	169(1)
monthly	2014-08-31	\$58,727.30	\$ -	\$58,727.30	169(1)
monthly	2014-09-30	\$405,350.70	-\$ 20,486.00	\$425,836.70	169(1)
monthly	2014-10-31	\$74,814.19	\$ -	\$74,814.19	169(1)
monthly	2014-11-30	\$85,342.07	-\$ 11,154.94	\$96,497.01	169(1)
monthly	2014-12-31	\$109,988.76	-\$ 42,644.68	\$152,633.44	169(1)
monthly	2015-01-31	\$201,447.10	-\$ 101,027.04	\$302,474.14	169(1)
monthly	2015-02-28	\$164,533.38	-\$ 95,397.75	\$259,931.13	169(1)
monthly	2015-03-31	\$193,793.79	-\$ 138,469.71	\$332,263.50	169(1)
monthly	2015-04-30	\$207,103.00	-\$ 140,799.86	\$347,902.86	169(1)
monthly	2015-05-31	\$211,295.00	-\$ 156,969.06	\$368,264.06	169(1)
monthly	2015-06-30	\$1,252,052.40	-\$ 142,839.85	\$1,394,892.25	169(1)
monthly	2015-07-31	\$113,488.60	-\$ 33,572.67	\$147,061.27	169(1)
monthly	2015-08-31	\$1,105,459.00	\$ -	\$1,105,459.00	169(1)
monthly	2015-09-30	\$261,335.60	-\$ 184,476.60	\$445,812.20	169(1)
monthly	2015-10-31	\$275,778.50	-\$ 205,375.46	\$481,153.96	169(1)
monthly	2015-11-30	\$227,098.80	-\$ 155,363.18	\$382,461.98	169(1)
monthly	2015-12-31	\$220,071.20	-\$ 123,603.14	\$343,674.34	169(1)
monthly	2016-01-31	\$261,378.10	-\$ 161,683.12	\$423,061.22	169(1)
monthly	2016-02-29	\$261,127.60	-\$ 166,071.24	\$427,198.84	169(1)
monthly	2016-03-31	\$293,015.50	-\$ 221,112.58	\$514,128.08	169(1)
monthly	2016-04-30	\$242,317.40	-\$ 168,158.79	\$410,476.19	169(1)
monthly	2016-05-31	\$381,105.30	-\$ 299,548.24	\$680,653.54	169(1)
monthly	2016-06-30	\$350,351.40	-\$ 250,816.73	\$601,168.13	169(1)
monthly	2016-07-31	\$374,499.80	-\$ 262,760.90	\$637,260.70	169(1)
monthly	2016-08-31	\$453,124.20	-\$ 367,804.42	\$820,928.62	169(1)
monthly	2016-09-30	\$498,728.30	-\$ 388,203.74	\$886,932.04	169(1)
monthly	2016-10-31	\$355,445.60	-\$ 278,166.78	\$633,612.38	169(1)
monthly	2016-11-30	\$410,323.60	-\$ 315,015.04	\$725,338.64	169(1)
monthly	2016-12-31	\$306,965.50	-\$ 238,654.10	\$545,619.60	169(1)

**GST/HST Audit of 999 Gold Depot (Canada) Limited**  
**Audit period: 2013-04-01 to 2019-08-31**

**WP4903: Input Tax Credit Revisions**

**PROTECTED B**

monthly	2017-01-31	\$486,994.40	-\$ 447,806.51	\$934,800.91	169(1)
monthly	2017-02-28	\$469,233.50	-\$ 375,140.12	\$844,373.62	169(1)
monthly	2017-03-31	\$520,668.50	-\$ 392,167.07	\$912,835.57	169(1)
monthly	2017-04-30	\$253,830.30	-\$ 158,210.25	\$412,040.55	169(1)
monthly	2017-05-31	\$288,940.20	-\$ 229,043.91	\$517,984.11	169(1)
monthly	2017-06-30	\$273,486.80	-\$ 175,262.54	\$448,749.34	169(1)
monthly	2017-07-31	\$241,031.70	-\$ 155,306.78	\$396,338.48	169(1)
monthly	2017-08-31	\$417,959.40	-\$ 331,940.16	\$749,899.56	169(1)
monthly	2017-09-30	\$161,536.90	-\$ 85,659.71	\$247,196.61	169(1)
monthly	2017-10-31	\$242,269.00	-\$ 101,314.99	\$343,583.99	169(1)
monthly	2017-11-30	\$276,332.00	-\$ 160,887.89	\$437,219.89	169(1)
monthly	2017-12-31	\$287,157.50	-\$ 199,493.50	\$486,651.00	169(1)
monthly	2018-01-31	\$478,434.90	-\$ 327,125.08	\$805,559.98	169(1)
monthly	2018-02-28	\$397,617.10	-\$ 302,522.81	\$700,139.91	169(1)
monthly	2018-03-31	\$436,369.30	-\$ 302,261.12	\$738,630.42	169(1)
monthly	2018-04-30	\$381,904.00	-\$ 298,743.31	\$680,647.31	169(1)
monthly	2018-05-31	\$521,222.10	-\$ 427,919.22	\$949,141.32	169(1)
monthly	2018-06-30	\$511,810.30	-\$ 428,478.23	\$940,288.53	169(1)
monthly	2018-07-31	\$577,118.20	-\$ 487,975.78	\$1,065,093.98	169(1)
monthly	2018-08-31	\$425,861.90	-\$ 347,548.63	\$773,410.53	169(1)
monthly	2018-09-30	\$361,517.90	-\$ 307,121.07	\$668,638.97	169(1)
monthly	2018-10-31	\$533,232.10	-\$ 408,456.18	\$941,688.28	169(1)
monthly	2018-11-30	\$562,862.90	-\$ 344,170.71	\$907,033.61	169(1)
monthly	2018-12-31	\$560,715.50	-\$ 452,526.82	\$1,013,242.32	169(1)
monthly	2019-01-31	\$336,456.20	-\$ 181,521.62	\$517,977.82	169(1)
monthly	2019-02-28	\$297,340.70	-\$ 199,410.02	\$496,750.72	169(1)
monthly	2019-03-31	\$329,590.00	-\$ 206,586.55	\$536,176.55	169(1)
monthly	2019-04-30	\$425,140.20	-\$ 319,026.27	\$744,166.47	169(1)
monthly	2019-05-31	\$445,974.10	-\$ 357,891.45	\$803,865.55	169(1)
monthly	2019-06-30	\$453,839.80	-\$ 238,576.25	\$692,416.05	169(1)
monthly	2019-07-31	\$227,144.84	-\$ 93,183.36	\$320,328.20	169(1)
monthly	2019-08-31	\$157,656.80	-\$ 40,555.92	\$198,212.72	169(1)
<b>Total</b>		<b>\$25,691,059.24</b>	<b>-\$15,658,841.56</b>	<b>\$41,349,900.80</b>	

**Purpose:** The purpose of this working paper is to present, on a vendor-by-vendor basis, the ITC adjustments that are being made as a result of audit findings.

**Findings/Conclusions:** For findings/conclusions please refer to WP4903.

<b>ITC Revisions by Supplier</b>				
<b>BN</b>	<b>LEGAL NAME</b>	<b>OPERATING NAME</b>	<b>TIME PERIOD</b>	<b>ITCS Change</b>
810237404	2287429 ONTARIO INC.	-	2013-04-30 to 2017-03-28	-\$6,371,718.81
753151125	GOLD & SILVER INC.	-	2016-09-15 to 2018-08-07	-\$2,129,324.00
733430524	ALVIN GOLD INC.	-	2017-01-24 to 2019-06-25	-\$1,278,436.91
777460882	OHANNES KHATCHIRIAN	JK / JK Jewellery	2018-01-09 to 2018-12-26	-\$1,213,833.03
755209483	1994930 ONTARIO INC.	-	2018-05-22 to 2018-12-28	-\$961,884.91
805270303	2337980 ONTARIO INC.	-	2018-07-10 to 2019-07-08	-\$850,348.02
864640800	NAZ ENTERPRISES INC.	-	2017-04-19 to 2019-07-22	-\$775,919.94
816658835	2407938 ONTARIO INC.	SRI VIJEYALALITHA GOLD	2016-01-11 to 2016-12-29	-\$647,320.25
797714680	2593837 ONTARIO INC.	GREEN LEAF METALS	2018-01-11 to 2019-05-02	-\$498,907.38
718186117	1995891 ONTARIO INC.	-	2019-01-09 to 2019-06-18	-\$283,177.19
712480128	KTI CORPORATION	-	2018-12-10 to 2019-08-22	-\$199,948.25
801714999	2466778 ONTARIO INC.	-	2019-03-27 to 2019-06-19	-\$137,915.88
802457184	2462300 ONTARIO INC.	KRISH GOLD IMPEX	2017-01-17 to 2017-01-24	-\$69,349.92
715346680	1995949 ONTARIO INC.	-	2019-05-27 to 2019-06-18	-\$59,721.78
702904087	5010433 ONTARIO INC.	-	2019-04-06 to 2019-05-27	-\$59,522.89
725134084	2665988 ONTARIO LTD.	ROY METALS	2018-12-06 to 2018-12-10	-\$33,324.16
846874972	2388905 ONTARIO INC.	A&Z CREATIONS	2019-05-29 to 2019-08-09	-\$31,824.47
805282233	2417916 ONTARIO INC.	CASH FOR GOLD	2019-06-11 to 2019-06-11	-\$24,827.39
870615119	1503329 ONTARIO LTD	GOLD CITY	2019-05-24 to 2019-07-24	-\$13,657.79
702790528	GTA JEWELLERY LOAN INC.	-	2019-06-10 to 2019-06-10	-\$13,031.92
875078503	SUHAAG JEWELLERS LTD.	-	2019-05-21 to 2019-06-12	-\$4,846.67
<b>TOTAL</b>				<b>-\$15,658,841.56</b>

**Purpose:** The purpose of this working paper is to present the ITC claims of 999 Gold Depot (Canada) limited, as extracted from their books of original entry.

**Findings/Conclusions:** For findings/conclusions please refer to WP4903.

ACCT_NAME	MEMO_1	JE	TRANS_DATE	AMOUNT	CUST_VEND
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	29995	2013-04-30	\$1,276.19	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30101	2013-05-06	\$2,780.09	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30102	2013-05-06	\$4,184.81	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30145	2013-05-07	\$4,259.33	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30146	2013-05-07	\$4,453.99	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30244	2013-05-13	\$6,014.23	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30358	2013-05-22	\$612.91	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30360	2013-05-22	\$2,557.29	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30469	2013-05-27	\$3,393.30	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30565	2013-05-29	\$3,401.78	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30569	2013-05-31	\$1,200.13	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30570	2013-05-31	\$2,806.03	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30709	2013-06-04	\$3,670.32	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30735	2013-06-05	\$4,241.05	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30819	2013-06-13	\$5,781.25	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30979	2013-06-14	\$8,481.15	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30987	2013-06-17	\$9,223.01	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30981	2013-06-17	\$8,003.70	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	30992	2013-06-20	\$5,625.48	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31109	2013-06-24	\$3,785.90	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31113	2013-06-26	\$5,283.96	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31119	2013-06-28	\$5,203.96	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31285	2013-07-02	\$2,309.11	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31286	2013-07-02	\$2,689.75	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31292	2013-07-04	\$602.46	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31293	2013-07-04	\$5,573.64	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31294	2013-07-04	\$5,149.97	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31304	2013-07-08	\$2,194.09	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31302	2013-07-08	\$820.92	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31303	2013-07-08	\$1,672.01	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31444	2013-07-12	\$5,362.09	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31445	2013-07-12	\$5,362.66	2287429 Ontario Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31581	2013-07-19	\$9,574.48	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31585	2013-07-23	\$7,459.53	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31739	2013-07-31	\$7,040.69	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31740	2013-07-31	\$4,419.76	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31741	2013-07-31	\$1,757.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31878	2013-08-01	\$7,759.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31879	2013-08-01	\$477.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31882	2013-08-06	\$8,171.78	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31886	2013-08-08	\$2,146.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	31887	2013-08-08	\$4,783.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32085	2013-08-13	\$3,743.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32086	2013-08-13	\$7,969.73	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32090	2013-08-15	\$5,200.03	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32091	2013-08-15	\$5,929.11	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32212	2013-08-26	\$2,954.95	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32213	2013-08-26	\$4,134.85	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32214	2013-08-29	\$4,597.22	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32215	2013-08-29	\$6,648.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32297	2013-09-03	\$4,690.22	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32417	2013-09-06	\$5,111.02	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32418	2013-09-06	\$5,035.47	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32419	2013-09-09	\$4,791.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32420	2013-09-09	\$5,445.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32423	2013-09-11	\$4,959.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32422	2013-09-11	\$5,915.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32554	2013-09-13	\$1,205.94	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32553	2013-09-13	\$5,379.35	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32555	2013-09-16	\$7,783.69	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32635	2013-09-19	\$2,869.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32636	2013-09-19	\$2,725.77	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32813	2013-09-24	\$2,998.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32814	2013-09-24	\$3,431.61	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32817	2013-09-26	\$4,162.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32818	2013-09-27	\$4,470.98	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32819	2013-09-30	\$7,003.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	32820	2013-09-30	\$6,716.66	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33055	2013-10-03	\$3,564.81	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33056	2013-10-03	\$3,326.18	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33058	2013-10-07	\$5,372.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33059	2013-10-07	\$6,849.54	2287429	Ontarion Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

**PROTECTED B**

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33309	2013-10-10	\$6,010.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33311	2013-10-10	\$6,908.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33584	2013-10-17	\$6,215.14	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33571	2013-10-17	\$5,749.00	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33572	2013-10-18	\$10,485.16	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33573	2013-10-18	\$9,948.32	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33576	2013-10-23	\$10,309.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33577	2013-10-23	\$9,756.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33580	2013-10-25	\$9,122.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33579	2013-10-25	\$10,024.03	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33582	2013-10-28	\$8,519.95	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33583	2013-10-28	\$6,878.24	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33717	2013-10-30	\$9,462.51	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33718	2013-10-30	\$9,429.13	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33837	2013-11-01	\$9,554.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33836	2013-11-01	\$8,960.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33838	2013-11-04	\$8,966.98	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33839	2013-11-04	\$7,303.16	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33842	2013-11-07	\$9,045.93	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	33843	2013-11-07	\$9,055.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34080	2013-11-11	\$6,893.10	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34081	2013-11-11	\$7,059.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34078	2013-11-15	\$6,680.56	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34079	2013-11-15	\$7,966.71	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34076	2013-11-18	\$6,860.29	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34077	2013-11-18	\$6,865.11	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34074	2013-11-20	\$6,842.03	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34075	2013-11-20	\$6,749.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34154	2013-11-25	\$5,985.28	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34155	2013-11-25	\$9,453.78	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34213	2013-11-28	\$8,578.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34214	2013-11-28	\$8,505.91	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34218	2013-11-28	\$5,324.53	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34219	2013-11-28	\$4,597.64	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34290	2013-12-03	\$8,505.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34291	2013-12-03	\$8,966.01	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34340	2013-12-05	\$8,589.50	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34341	2013-12-05	\$8,106.05	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34414	2013-12-10	\$6,505.50	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34415	2013-12-10	\$10,293.56	2287429	Ontarion Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34416	2013-12-10	\$2,568.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34417	2013-12-10	\$5,314.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34488	2013-12-13	\$7,007.89	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34491	2013-12-13	\$6,809.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34486	2013-12-13	\$6,595.04	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34487	2013-12-13	\$7,257.19	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34531	2013-12-17	\$6,013.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34532	2013-12-17	\$5,639.91	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34533	2013-12-17	\$6,124.83	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34534	2013-12-17	\$6,225.61	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34706	2013-12-19	\$9,132.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34707	2013-12-19	\$9,036.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34708	2013-12-19	\$6,123.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34709	2013-12-19	\$7,327.86	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34711	2013-12-23	\$8,772.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34712	2013-12-23	\$9,220.59	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34713	2013-12-23	\$4,789.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34714	2013-12-23	\$5,553.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34797	2014-01-06	\$3,685.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34798	2014-01-06	\$3,814.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34864	2014-01-10	\$4,399.73	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34865	2014-01-10	\$6,498.18	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34867	2014-01-10	\$5,082.49	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34866	2014-01-10	\$3,427.89	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34890	2014-01-14	\$6,232.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34891	2014-01-14	\$8,683.72	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34892	2014-01-14	\$8,500.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34893	2014-01-14	\$6,722.75	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34991	2014-01-17	\$11,200.08	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	34992	2014-01-17	\$12,410.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35010	2014-01-20	\$11,352.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35011	2014-01-20	\$11,278.40	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35159	2014-01-23	\$7,383.46	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35160	2014-01-23	\$7,335.08	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35181	2014-01-30	\$8,583.98	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35182	2014-01-30	\$8,241.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35340	2014-02-03	\$3,325.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35337	2014-02-03	\$3,224.46	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35338	2014-02-03	\$8,973.72	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35339	2014-02-03	\$8,626.73	2287429	Ontarion Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

**PROTECTED B**

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35333	2014-02-06	\$7,637.47	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35334	2014-02-06	\$7,534.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35374	2014-02-10	\$9,044.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35373	2014-02-10	\$9,204.10	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35486	2014-02-13	\$9,601.59	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35488	2014-02-13	\$9,835.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35503	2014-02-18	\$6,286.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35504	2014-02-18	\$6,119.05	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35649	2014-02-21	\$6,053.22	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35650	2014-02-21	\$5,436.41	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35651	2014-02-24	\$6,636.93	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35652	2014-02-24	\$6,814.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35655	2014-02-27	\$6,966.31	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35656	2014-02-27	\$6,425.27	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35657	2014-02-27	\$6,656.51	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35658	2014-02-27	\$6,225.14	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35816	2014-03-11	\$7,072.62	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35817	2014-03-11	\$6,484.76	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35818	2014-03-11	\$6,438.16	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	35815	2014-03-11	\$7,027.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36015	2014-03-14	\$10,334.88	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36016	2014-03-14	\$9,424.19	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36036	2014-03-17	\$9,394.51	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36037	2014-03-17	\$9,284.56	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36190	2014-03-20	\$9,055.03	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36191	2014-03-20	\$9,330.28	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36194	2014-03-24	\$4,738.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36195	2014-03-24	\$4,744.01	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36196	2014-03-24	\$9,087.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36197	2014-03-24	\$9,372.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36202	2014-03-28	\$9,431.25	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36203	2014-03-28	\$10,151.89	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36401	2014-04-01	\$6,119.26	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36402	2014-04-01	\$5,534.87	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36403	2014-04-01	\$7,518.69	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36404	2014-04-01	\$7,487.13	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36408	2014-04-04	\$5,721.11	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36409	2014-04-04	\$8,459.47	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36410	2014-04-04	\$7,781.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36411	2014-04-04	\$2,825.09	2287429	Ontarion Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36412	2014-04-04	\$1,179.01	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36407	2014-04-04	\$6,280.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36418	2014-04-08	\$9,443.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36415	2014-04-08	\$6,421.17	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36416	2014-04-08	\$4,134.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36417	2014-04-08	\$5,479.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36423	2014-04-11	\$7,871.43	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36424	2014-04-11	\$3,685.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36425	2014-04-11	\$5,012.80	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36426	2014-04-11	\$7,094.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36427	2014-04-11	\$8,481.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36422	2014-04-11	\$8,286.89	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36616	2014-04-15	\$7,786.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36617	2014-04-15	\$7,732.28	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36618	2014-04-15	\$6,604.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36619	2014-04-15	\$6,244.88	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36621	2014-04-17	\$4,219.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36622	2014-04-17	\$4,322.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36623	2014-04-17	\$6,716.50	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36624	2014-04-17	\$6,601.76	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36627	2014-04-23	\$8,964.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36628	2014-04-23	\$8,534.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36629	2014-04-23	\$5,672.26	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36626	2014-04-23	\$5,646.50	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36632	2014-04-25	\$10,119.10	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36633	2014-04-25	\$5,817.62	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36634	2014-04-25	\$5,832.80	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36635	2014-04-25	\$10,193.54	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36757	2014-04-28	\$6,213.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36754	2014-04-28	\$9,978.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36755	2014-04-28	\$6,197.82	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36756	2014-04-28	\$10,017.77	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36947	2014-05-01	\$12,233.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36948	2014-05-01	\$10,573.02	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36949	2014-05-01	\$4,478.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36950	2014-05-01	\$4,660.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36951	2014-05-05	\$9,237.86	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36952	2014-05-05	\$6,634.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36953	2014-05-05	\$6,404.80	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36954	2014-05-05	\$9,108.34	2287429	Ontarion Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36960	2014-05-08	\$7,246.83	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36961	2014-05-08	\$7,263.75	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36958	2014-05-08	\$3,288.87	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36959	2014-05-08	\$3,276.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36964	2014-05-13	\$8,011.11	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36965	2014-05-13	\$8,299.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36966	2014-05-13	\$8,321.77	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	36967	2014-05-13	\$7,747.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37190	2014-05-16	\$8,599.45	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37191	2014-05-16	\$6,512.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37192	2014-05-16	\$5,132.73	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37189	2014-05-16	\$8,143.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37195	2014-05-21	\$5,680.71	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37196	2014-05-21	\$5,659.73	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37200	2014-05-21	\$3,661.26	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37197	2014-05-21	\$7,124.45	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37198	2014-05-21	\$7,494.35	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37199	2014-05-21	\$4,734.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37205	2014-05-23	\$5,710.65	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37206	2014-05-23	\$5,850.37	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37203	2014-05-23	\$11,457.85	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37204	2014-05-23	\$11,770.56	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37207	2014-05-27	\$6,986.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37208	2014-05-27	\$4,090.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37209	2014-05-27	\$4,848.01	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37210	2014-05-27	\$5,503.58	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37211	2014-05-27	\$5,009.91	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37212	2014-05-27	\$6,148.53	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37358	2014-05-30	\$5,387.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37340	2014-05-30	\$5,537.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37341	2014-05-30	\$5,502.97	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37342	2014-05-30	\$10,013.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37343	2014-05-30	\$12,390.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37355	2014-05-30	\$10,785.60	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37356	2014-05-30	\$10,846.82	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37357	2014-05-30	\$5,585.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37542	2014-06-06	\$9,581.32	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37543	2014-06-06	\$6,479.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37544	2014-06-06	\$9,713.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37545	2014-06-06	\$6,629.64	2287429	Ontarion Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37548	2014-06-11	\$11,022.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37549	2014-06-11	\$11,131.03	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37550	2014-06-11	\$8,375.72	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37551	2014-06-11	\$8,502.48	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37553	2014-06-13	\$9,142.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37554	2014-06-13	\$9,384.22	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37555	2014-06-13	\$7,584.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37556	2014-06-13	\$7,662.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37557	2014-06-13	\$6,366.85	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37558	2014-06-13	\$6,427.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37559	2014-06-17	\$9,583.89	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37560	2014-06-17	\$9,323.06	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37561	2014-06-17	\$3,971.65	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37563	2014-06-17	\$8,512.40	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37564	2014-06-17	\$7,010.60	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37673	2014-06-20	\$4,463.28	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37674	2014-06-20	\$7,410.98	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37675	2014-06-20	\$8,905.25	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37670	2014-06-20	\$5,366.66	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37671	2014-06-20	\$6,103.00	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37672	2014-06-20	\$8,905.25	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37774	2014-06-25	\$5,668.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37775	2014-06-25	\$12,943.48	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37776	2014-06-25	\$12,300.95	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37777	2014-06-25	\$6,156.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37782	2014-06-27	\$4,779.85	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37783	2014-06-27	\$5,662.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37784	2014-06-27	\$4,961.89	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37785	2014-06-27	\$2,953.51	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37780	2014-06-27	\$12,559.61	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37781	2014-06-27	\$13,549.77	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37856	2014-06-30	\$10,129.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37858	2014-06-30	\$3,945.24	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37861	2014-06-30	\$11,564.03	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37857	2014-06-30	\$5,504.16	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37859	2014-06-30	\$6,546.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37860	2014-06-30	\$8,070.61	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37967	2014-07-08	\$10,939.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	37968	2014-07-08	\$13,912.87	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	39077	2014-09-16	\$6,701.10	2287429	Ontarion Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

**PROTECTED B**

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	39078	2014-09-16	\$6,221.25	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	39094	2014-09-26	\$4,013.02	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	39095	2014-09-26	\$3,550.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	39906	2014-11-28	\$5,567.19	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	39907	2014-11-28	\$5,587.75	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40249	2014-12-01	\$9,443.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40067	2014-12-05	\$7,988.67	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40068	2014-12-05	\$8,320.00	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40117	2014-12-12	\$8,452.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40116	2014-12-12	\$8,440.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40591	2015-01-08	\$10,899.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40592	2015-01-08	\$11,533.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40841	2015-01-16	\$9,665.83	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40840	2015-01-16	\$15,567.24	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40872	2015-01-26	\$14,250.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40873	2015-01-26	\$10,946.84	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40926	2015-01-30	\$17,619.10	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	40925	2015-01-30	\$10,543.84	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41354	2015-02-01	-\$9,443.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41188	2015-02-05	\$4,846.48	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41189	2015-02-05	\$21,950.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41184	2015-02-12	\$15,153.98	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41185	2015-02-12	\$12,867.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41252	2015-02-19	\$13,292.10	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41253	2015-02-19	\$12,101.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41324	2015-02-26	\$14,420.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41325	2015-02-26	\$10,208.67	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41491	2015-03-05	\$12,209.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41492	2015-03-05	\$11,641.58	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41493	2015-03-10	\$248.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41494	2015-03-11	\$12,363.18	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41495	2015-03-11	\$5,836.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41496	2015-03-11	\$3,460.26	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41497	2015-03-11	\$2,297.27	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41498	2015-03-11	\$3,784.84	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41691	2015-03-18	\$14,424.12	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41692	2015-03-18	\$13,552.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41695	2015-03-25	\$13,480.82	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41694	2015-03-25	\$17,321.75	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41756	2015-03-31	\$13,875.62	2287429	Ontarion Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	41757	2015-03-31	\$13,972.64	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42020	2015-04-10	\$14,852.24	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42018	2015-04-10	\$14,864.80	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42019	2015-04-10	\$6,398.26	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42022	2015-04-14	\$7,911.66	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42023	2015-04-14	\$6,063.22	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42024	2015-04-14	\$11,976.81	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42025	2015-04-14	\$12,426.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42027	2015-04-20	\$2,871.35	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42028	2015-04-20	\$1,303.32	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42029	2015-04-20	\$2,712.08	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42030	2015-04-20	\$12,220.00	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42031	2015-04-20	\$8,795.48	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42032	2015-04-20	\$5,409.54	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42222	2015-04-28	\$11,909.66	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42223	2015-04-28	\$21,084.65	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42312	2015-05-04	\$11,819.02	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42313	2015-05-04	\$25,266.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42444	2015-05-12	\$19,707.71	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42445	2015-05-12	\$18,664.65	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42447	2015-05-19	\$34,720.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42685	2015-05-29	\$30,225.84	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42686	2015-05-29	\$16,564.73	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42814	2015-06-05	\$25,816.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42815	2015-06-05	\$7,695.65	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42817	2015-06-12	\$27,434.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	42818	2015-06-12	\$7,793.56	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	43015	2015-06-17	\$23,379.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	43016	2015-06-17	\$12,076.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	43018	2015-06-24	\$12,446.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	43019	2015-06-24	\$26,196.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	43355	2015-07-15	\$19,301.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	43356	2015-07-15	\$14,271.60	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44169	2015-09-02	\$21,883.28	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44171	2015-09-11	\$32,642.02	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44173	2015-09-16	\$34,220.10	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44360	2015-09-22	\$12,273.95	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44359	2015-09-22	\$21,406.60	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44364	2015-09-25	\$9,692.36	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44365	2015-09-25	\$21,394.00	2287429	Ontarion Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44486	2015-09-28	\$6,922.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44487	2015-09-28	\$24,041.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44621	2015-10-05	\$23,879.58	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44622	2015-10-05	\$7,746.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44770	2015-10-13	\$26,026.18	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44771	2015-10-13	\$7,837.58	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44773	2015-10-16	\$9,780.17	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44774	2015-10-16	\$25,309.13	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44776	2015-10-20	\$5,334.92	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44777	2015-10-20	\$29,268.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44896	2015-10-26	\$5,490.49	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44897	2015-10-26	\$21,890.72	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44925	2015-10-30	\$11,938.56	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44926	2015-10-30	\$10,325.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44927	2015-10-30	\$6,579.16	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44928	2015-10-30	\$6,414.29	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	44929	2015-10-30	\$7,553.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45116	2015-11-06	\$17,579.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45117	2015-11-06	\$24,197.32	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45119	2015-11-11	\$7,540.37	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45121	2015-11-13	\$11,735.50	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45122	2015-11-13	\$24,345.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45306	2015-11-19	\$17,365.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45307	2015-11-19	\$23,904.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45303	2015-11-25	\$20,118.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45304	2015-11-25	\$8,576.87	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45474	2015-12-03	\$10,506.83	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45475	2015-12-03	\$14,849.11	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45478	2015-12-08	\$25,038.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45477	2015-12-08	\$12,896.29	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45692	2015-12-11	\$7,489.91	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45693	2015-12-11	\$20,670.57	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45697	2015-12-18	\$19,182.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	45698	2015-12-18	\$12,969.80	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46023	2016-01-06	\$6,969.81	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46024	2016-01-06	\$24,560.34	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46056	2016-01-11	\$1,935.51	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46202	2016-01-14	\$3,196.99	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46260	2016-01-15	\$23,054.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46261	2016-01-15	\$8,762.05	2287429	Ontarion Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46263	2016-01-21	\$11,034.63	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46264	2016-01-21	\$33,043.41	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46214	2016-01-22	\$3,102.66	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46266	2016-01-26	\$12,864.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46267	2016-01-26	\$33,159.56	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46427	2016-02-04	\$13,340.13	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46428	2016-02-04	\$33,419.29	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46431	2016-02-11	\$29,174.09	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46430	2016-02-11	\$8,957.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46631	2016-02-18	\$15,409.95	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46632	2016-02-18	\$19,805.02	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46613	2016-02-19	\$6,180.15	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46634	2016-02-23	\$30,422.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46635	2016-02-23	\$9,362.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46883	2016-03-02	\$20,573.66	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46884	2016-03-02	\$14,178.57	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46886	2016-03-07	\$26,930.72	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46887	2016-03-07	\$14,726.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46972	2016-03-14	\$9,104.05	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	46973	2016-03-14	\$1,782.79	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47030	2016-03-15	\$31,695.64	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47031	2016-03-15	\$9,547.59	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47123	2016-03-22	\$19,964.44	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47124	2016-03-22	\$14,342.75	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47111	2016-03-23	\$13,117.69	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47126	2016-03-30	\$19,426.49	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47127	2016-03-30	\$25,721.40	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47275	2016-04-06	\$12,955.07	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47328	2016-04-13	\$16,600.31	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47327	2016-04-13	\$36,284.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47481	2016-04-20	\$29,042.67	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47482	2016-04-20	\$9,301.78	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47523	2016-04-27	\$12,806.68	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47587	2016-04-29	\$51,167.32	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47588	2016-05-02	\$11,709.60	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47810	2016-05-09	\$12,825.28	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47811	2016-05-09	\$47,091.42	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47659	2016-05-10	\$13,315.62	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47814	2016-05-13	\$28,040.06	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47813	2016-05-13	\$11,798.80	2287429	Ontarion Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

**PROTECTED B**

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47816	2016-05-18	\$7,344.49	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47817	2016-05-18	\$39,819.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47943	2016-05-20	\$20,004.20	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47973	2016-05-24	\$10,444.82	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47974	2016-05-24	\$31,199.24	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47976	2016-05-31	\$33,734.62	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47977	2016-05-31	\$13,065.72	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	47944	2016-05-31	\$19,155.16	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48183	2016-06-07	\$35,325.15	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48184	2016-06-07	\$10,461.24	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48186	2016-06-13	\$33,867.88	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48187	2016-06-13	\$15,404.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48323	2016-06-21	\$52,915.77	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48324	2016-06-21	\$17,231.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48327	2016-06-27	\$40,826.39	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48326	2016-06-27	\$6,534.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48307	2016-06-28	\$17,641.16	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48329	2016-06-29	\$20,607.86	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48543	2016-07-05	\$19,922.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48513	2016-07-07	\$25,174.22	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48545	2016-07-11	\$18,955.13	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48549	2016-07-15	\$17,870.04	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48531	2016-07-15	\$32,814.21	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48672	2016-07-21	\$4,856.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48674	2016-07-25	\$23,461.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48675	2016-07-25	\$39,888.35	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48716	2016-07-27	\$35,495.58	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48713	2016-07-29	\$13,999.23	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48714	2016-07-29	\$30,323.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48877	2016-08-02	\$42,110.99	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48876	2016-08-02	\$9,234.82	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48879	2016-08-09	\$44,301.96	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48880	2016-08-09	\$15,569.21	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49041	2016-08-16	\$15,587.68	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49042	2016-08-16	\$50,333.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	48964	2016-08-17	\$35,280.13	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49047	2016-08-24	\$44,129.58	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49046	2016-08-24	\$14,368.78	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49125	2016-08-30	\$8,786.73	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49126	2016-08-30	\$53,289.23	2287429	Ontarion Inc.

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49120	2016-08-31	\$34,811.93	2407938 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49289	2016-09-06	\$40,068.99	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49290	2016-09-06	\$11,151.31	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49292	2016-09-13	\$8,927.86	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49293	2016-09-13	\$48,596.85	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49274	2016-09-13	\$50,814.48	2407938 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49295	2016-09-15	\$14,035.06	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49297	2016-09-16	\$13,597.25	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49472	2016-09-20	\$14,615.66	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49473	2016-09-20	\$36,561.81	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49475	2016-09-27	\$14,326.18	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49477	2016-09-28	\$34,500.16	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49478	2016-09-28	\$9,121.08	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49456	2016-09-29	\$41,122.42	2407938 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49518	2016-09-30	\$15,169.25	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49519	2016-09-30	\$20,640.73	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49468	2016-09-30	\$14,954.65	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49696	2016-10-07	\$13,819.02	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49690	2016-10-11	\$9,243.88	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49691	2016-10-11	\$28,354.37	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49698	2016-10-11	\$14,042.92	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49693	2016-10-17	\$4,759.77	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49694	2016-10-17	\$33,628.66	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49805	2016-10-20	\$54,115.64	2407938 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49789	2016-10-20	\$20,526.51	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49793	2016-10-25	\$14,257.17	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49794	2016-10-25	\$19,945.73	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49796	2016-10-27	\$20,223.73	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49856	2016-10-31	\$45,249.38	2407938 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49924	2016-11-01	\$22,715.43	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	49921	2016-11-01	\$8,101.35	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50036	2016-11-08	\$31,051.75	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50035	2016-11-08	\$8,105.47	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50040	2016-11-15	\$13,710.82	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50041	2016-11-15	\$20,802.91	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50030	2016-11-17	\$43,481.23	2407938 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50033	2016-11-17	\$19,737.40	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50202	2016-11-22	\$27,133.17	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50203	2016-11-22	\$9,787.22	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50200	2016-11-22	\$19,638.12	Gold & Silver Inc.. Gold & Silver Inc

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50205	2016-11-29	\$6,410.90	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50206	2016-11-29	\$25,105.05	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50184	2016-11-29	\$45,902.97	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50208	2016-11-29	\$13,331.25	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50437	2016-12-05	\$13,347.38	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50438	2016-12-05	\$13,051.88	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50427	2016-12-05	\$1,949.31	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50429	2016-12-06	\$4,878.32	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50431	2016-12-06	\$6,729.45	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50440	2016-12-12	\$17,432.07	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50441	2016-12-12	\$29,431.79	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50419	2016-12-12	\$37,071.18	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50433	2016-12-13	\$6,748.28	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50435	2016-12-15	\$12,804.56	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50533	2016-12-19	\$8,929.98	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50534	2016-12-19	\$38,827.70	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50531	2016-12-22	\$11,859.31	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50529	2016-12-22	\$3,903.74	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50567	2016-12-29	\$31,689.15	2407938	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53024	2017-01-01	\$10,353.76	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50646	2017-01-05	\$12,999.53	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50647	2017-01-05	\$13,377.83	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50644	2017-01-05	\$19,589.99	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50751	2017-01-10	\$19,551.30	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50740	2017-01-10	\$18,790.13	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50753	2017-01-12	\$20,027.36	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50747	2017-01-12	\$20,189.86	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50742	2017-01-16	\$11,771.13	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50744	2017-01-16	\$26,757.03	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50815	2017-01-17	\$32,313.58	2462300	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50850	2017-01-19	\$17,180.50	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50851	2017-01-19	\$40,343.06	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50853	2017-01-20	\$32,905.34	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50830	2017-01-24	\$37,036.34	2462300	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50918	2017-01-24	\$32,872.48	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50920	2017-01-27	\$38,344.41	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50940	2017-01-31	\$24,463.55	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	50941	2017-01-31	\$18,939.33	2287429	Ontarion Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51009	2017-02-02	\$14,817.01	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51013	2017-02-02	\$26,413.24	Gold & Silver Inc.	

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51011	2017-02-06	\$13,581.06	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51015	2017-02-06	\$32,426.12	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51119	2017-02-09	\$19,347.63	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51115	2017-02-09	\$20,254.31	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51123	2017-02-10	\$42,325.46	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51121	2017-02-14	\$25,659.21	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51117	2017-02-14	\$20,991.08	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51125	2017-02-16	\$32,501.24	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51127	2017-02-21	\$34,078.38	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51222	2017-02-22	\$21,678.37	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51224	2017-02-23	\$21,025.11	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51246	2017-02-27	\$50,041.90	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51410	2017-03-02	\$47,929.75	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51406	2017-03-02	\$18,883.33	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51408	2017-03-02	\$22,563.03	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51414	2017-03-10	\$21,877.39	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51412	2017-03-10	\$20,715.01	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51570	2017-03-16	\$37,279.61	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51562	2017-03-16	\$21,946.06	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51560	2017-03-16	\$21,972.72	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51572	2017-03-22	\$27,576.99	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51564	2017-03-24	\$44,948.36	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51578	2017-03-28	\$32,520.60	2287429 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51566	2017-03-28	\$24,605.08	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51568	2017-03-28	\$22,709.60	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51600	2017-03-31	\$12,721.24	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51602	2017-03-31	\$13,918.30	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51751	2017-04-04	\$25,235.20	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51753	2017-04-05	\$32,974.26	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51757	2017-04-07	\$14,820.15	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51755	2017-04-07	\$21,964.87	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51761	2017-04-12	\$13,940.63	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51759	2017-04-12	\$16,053.58	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51763	2017-04-19	\$26,883.46	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	51896	2017-04-19	\$6,338.10	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52113	2017-05-05	\$6,781.57	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52117	2017-05-05	\$29,859.54	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52119	2017-05-09	\$23,176.13	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52121	2017-05-10	\$14,134.52	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52123	2017-05-15	\$20,873.92	Gold & Silver Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**  
**Audit period: 2013-04-01 to 2019-08-31**

**WP4903-2: 999 Input Tax Credit Claims**

**PROTECTED B**

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52127	2017-05-16	\$13,044.24	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52131	2017-05-16	\$16,879.58	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52195	2017-05-18	\$7,341.25	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52249	2017-05-24	\$13,703.11	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52262	2017-05-25	\$28,361.53	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52264	2017-05-26	\$29,549.95	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52208	2017-05-29	\$8,264.06	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52247	2017-05-30	\$17,074.51	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52344	2017-06-02	\$11,580.00	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52342	2017-06-07	\$17,186.27	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52329	2017-06-08	\$9,357.14	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52437	2017-06-15	\$5,317.37	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52454	2017-06-19	\$17,264.91	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52456	2017-06-22	\$13,279.36	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52447	2017-06-22	\$6,188.91	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52609	2017-06-27	\$36,285.38	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52611	2017-06-29	\$19,223.40	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52600	2017-06-29	\$7,832.65	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52613	2017-06-30	\$12,512.63	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52615	2017-06-30	\$19,234.52	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52712	2017-07-10	\$18,390.41	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52714	2017-07-11	\$18,389.70	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52773	2017-07-11	\$7,875.76	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52940	2017-07-18	\$18,805.88	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52938	2017-07-18	\$29,028.52	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52855	2017-07-19	\$8,229.48	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52942	2017-07-25	\$17,996.06	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52944	2017-07-26	\$17,992.58	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52946	2017-07-26	\$9,771.63	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	52878	2017-07-27	\$8,826.76	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53113	2017-08-02	\$8,042.24	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53115	2017-08-02	\$12,512.88	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53097	2017-08-02	\$19,966.30	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53095	2017-08-02	\$12,330.11	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53031	2017-08-04	\$7,705.35	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53099	2017-08-08	\$19,130.21	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53101	2017-08-08	\$11,811.13	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53103	2017-08-08	\$23,939.63	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53117	2017-08-09	\$11,984.78	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53119	2017-08-09	\$7,707.94	Alvin Gold Inc

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53032	2017-08-10	\$8,832.84	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53105	2017-08-11	\$28,361.22	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53107	2017-08-16	\$25,212.12	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53109	2017-08-16	\$27,080.90	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53227	2017-08-16	\$7,449.38	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53266	2017-08-21	\$19,528.42	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53265	2017-08-21	\$19,582.84	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53236	2017-08-23	\$10,081.12	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53292	2017-08-30	\$13,230.89	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53290	2017-08-30	\$37,449.86	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53413	2017-09-06	\$6,175.88	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53438	2017-09-07	\$26,366.08	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53541	2017-09-19	\$14,337.66	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53543	2017-09-20	\$9,549.90	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53521	2017-09-21	\$7,626.07	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53545	2017-09-27	\$6,705.35	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53547	2017-09-29	\$6,832.78	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53602	2017-09-29	\$8,065.99	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53768	2017-10-05	\$9,636.92	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53729	2017-10-05	\$8,001.20	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53770	2017-10-12	\$9,662.88	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53742	2017-10-12	\$7,433.64	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53772	2017-10-13	\$14,065.63	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53774	2017-10-19	\$8,514.48	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53776	2017-10-20	\$13,536.99	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53844	2017-10-20	\$8,773.60	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53778	2017-10-25	\$13,015.49	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	53877	2017-10-25	\$8,674.16	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54084	2017-11-01	\$14,160.27	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54067	2017-11-03	\$13,812.01	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54068	2017-11-03	\$11,019.60	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54225	2017-11-07	\$11,401.82	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54048	2017-11-07	\$6,722.41	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54080	2017-11-09	\$13,580.81	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54071	2017-11-10	\$5,263.38	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54072	2017-11-10	\$8,661.87	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54040	2017-11-14	\$10,496.07	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54082	2017-11-16	\$13,934.61	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54247	2017-11-22	\$9,437.16	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54324	2017-11-27	\$6,636.13	Gold & Silver Inc.	

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54325	2017-11-27	\$13,276.44	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54326	2017-11-27	\$13,276.89	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54291	2017-11-29	\$9,208.42	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54463	2017-12-01	\$16,275.43	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54465	2017-12-02	\$24,053.07	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54428	2017-12-06	\$7,837.17	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54473	2017-12-08	\$43,170.34	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54475	2017-12-08	\$26,020.36	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54477	2017-12-13	\$16,506.48	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54452	2017-12-15	\$9,016.05	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54638	2017-12-19	\$22,884.19	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54636	2017-12-19	\$22,963.40	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54626	2017-12-21	\$10,767.01	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54640	2018-01-03	\$22,258.76	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54642	2018-01-03	\$22,257.56	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54727	2018-01-05	\$7,040.95	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54754	2018-01-09	\$6,664.33	JK Jewellery.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54756	2018-01-10	\$13,331.64	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54758	2018-01-10	\$26,658.76	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54745	2018-01-11	\$816.39	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54746	2018-01-11	\$6,753.34	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54744	2018-01-11	\$7,845.07	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54935	2018-01-16	\$20,095.83	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54851	2018-01-16	\$8,340.31	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54937	2018-01-17	\$13,342.67	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54933	2018-01-18	\$20,067.10	JK Jewellery.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54859	2018-01-22	\$6,736.54	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54991	2018-01-22	\$26,801.94	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54993	2018-01-23	\$12,995.78	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54972	2018-01-24	\$686.35	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54987	2018-01-24	\$2,016.29	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54995	2018-01-24	\$26,808.47	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55122	2018-01-28	\$19,933.47	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55124	2018-01-30	\$13,288.58	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	54978	2018-01-30	\$9,006.22	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55073	2018-01-31	\$800.01	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55074	2018-01-31	\$6,002.09	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55126	2018-01-31	\$26,576.63	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55197	2018-02-02	\$2,096.87	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55217	2018-02-05	\$7,326.47	Naz Enterprises Inc	Naz Enterprises Inc

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55221	2018-02-07	\$13,446.01	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55237	2018-02-09	\$13,582.84	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55235	2018-02-09	\$13,305.56	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55239	2018-02-09	\$39,915.29	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55228	2018-02-13	\$13,639.38	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55241	2018-02-15	\$6,826.03	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55243	2018-02-16	\$27,298.25	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55245	2018-02-17	\$27,300.86	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55397	2018-02-20	\$13,568.59	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55383	2018-02-20	\$9,012.65	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55401	2018-02-21	\$20,323.19	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55399	2018-02-21	\$20,340.59	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55370	2018-02-22	\$1,233.27	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55371	2018-02-22	\$1,701.75	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55373	2018-02-23	\$8,719.04	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55394	2018-02-27	\$6,846.10	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55526	2018-02-28	\$13,572.12	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55524	2018-02-28	\$13,565.91	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55522	2018-02-28	\$20,350.55	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55514	2018-02-28	\$8,551.49	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55721	2018-03-05	\$6,864.92	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55696	2018-03-06	\$1,088.54	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55715	2018-03-06	\$13,733.31	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55727	2018-03-06	\$20,343.64	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55677	2018-03-08	\$6,452.31	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55725	2018-03-10	\$6,915.86	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55729	2018-03-10	\$27,473.59	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55687	2018-03-12	\$6,908.15	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55688	2018-03-12	\$6,144.50	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55719	2018-03-12	\$6,917.43	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55956	2018-03-15	\$6,914.79	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55733	2018-03-15	\$20,724.71	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55912	2018-03-15	\$464.75	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55952	2018-03-16	\$13,831.16	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55901	2018-03-20	\$15,266.35	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55735	2018-03-20	\$20,730.14	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55921	2018-03-20	\$9,452.25	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55958	2018-03-22	\$6,886.08	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55960	2018-03-24	\$20,728.62	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55954	2018-03-26	\$13,789.91	Gold & Silver Inc.

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55909	2018-03-28	\$13,946.38	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55908	2018-03-28	\$8,500.85	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56000	2018-03-29	\$4,300.64	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55962	2018-03-29	\$15,672.38	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56004	2018-03-30	\$7,530.67	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	55964	2018-03-31	\$20,679.19	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56130	2018-04-03	\$8,171.20	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56167	2018-04-04	\$6,816.47	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56169	2018-04-05	\$20,461.50	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56171	2018-04-05	\$28,079.34	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56173	2018-04-06	\$20,445.50	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56138	2018-04-10	\$7,906.00	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56277	2018-04-11	\$20,408.04	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56275	2018-04-11	\$20,398.87	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56141	2018-04-12	\$20,995.45	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56279	2018-04-12	\$6,798.73	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56242	2018-04-17	\$23,164.43	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56289	2018-04-19	\$20,606.96	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56291	2018-04-20	\$24,044.04	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56249	2018-04-23	\$8,290.49	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56348	2018-04-25	\$6,460.39	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56364	2018-04-30	\$6,766.47	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56368	2018-04-30	\$20,289.25	Gold & Silver Inc..	Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56366	2018-04-30	\$20,302.15	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56356	2018-04-30	\$8,338.03	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56497	2018-05-02	\$6,894.14	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56518	2018-05-02	\$6,873.37	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56507	2018-05-02	\$11,698.51	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56529	2018-05-11	\$6,843.44	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56535	2018-05-11	\$6,802.45	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56533	2018-05-11	\$23,794.32	Gold & Silver Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56531	2018-05-11	\$23,799.71	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56523	2018-05-11	\$8,828.18	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56554	2018-05-14	\$32,491.36	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56618	2018-05-15	\$8,383.17	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56620	2018-05-15	\$447.43	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56621	2018-05-15	\$9,159.11	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56667	2018-05-22	\$13,559.21	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56669	2018-05-22	\$13,559.97	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56671	2018-05-22	\$6,718.08	1994930 ontario inc	

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56673	2018-05-22	\$6,717.48	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56659	2018-05-22	\$26,805.65	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56657	2018-05-22	\$26,509.47	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56663	2018-05-22	\$26,493.26	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56665	2018-05-22	\$26,806.15	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56626	2018-05-23	\$10,872.58	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56631	2018-05-25	\$9,176.60	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56645	2018-05-28	\$12,698.71	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56782	2018-05-29	\$13,520.41	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56732	2018-05-30	\$27,039.60	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56780	2018-05-31	\$27,035.54	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56778	2018-05-31	\$27,037.67	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56748	2018-05-31	\$7,353.65	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56937	2018-06-06	\$27,001.02	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56889	2018-06-06	\$10,632.18	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56939	2018-06-07	\$6,783.16	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56941	2018-06-08	\$40,712.99	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56943	2018-06-08	\$27,122.81	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56895	2018-06-08	\$8,462.47	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56945	2018-06-12	\$27,138.67	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56947	2018-06-14	\$33,879.30	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56949	2018-06-15	\$33,862.47	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56927	2018-06-18	\$9,015.18	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57099	2018-06-18	\$13,602.65	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	56985	2018-06-20	\$7,910.30	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57103	2018-06-21	\$34,015.68	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57101	2018-06-21	\$20,408.23	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57105	2018-06-22	\$27,213.09	Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57107	2018-06-25	\$13,488.10	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57109	2018-06-27	\$26,951.87	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57026	2018-06-27	\$6,360.19	2593837 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57111	2018-06-27	\$26,964.78	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57113	2018-06-29	\$26,953.09	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57168	2018-07-03	\$33,090.88	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57166	2018-07-03	\$13,236.20	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57164	2018-07-03	\$19,862.60	Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57162	2018-07-03	\$33,110.33	JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57385	2018-07-09	\$13,304.76	1994930 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57259	2018-07-09	\$9,363.52	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57383	2018-07-10	\$19,847.86	1994930 ontario inc

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57262	2018-07-10	\$13,942.40	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57381	2018-07-10	\$13,251.52		Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57379	2018-07-10	\$13,252.94		Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57275	2018-07-13	\$6,779.79	2593837	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57377	2018-07-13	\$19,827.02		JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57369	2018-07-17	\$13,227.48		Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57591	2018-07-18	\$19,820.06	1994930	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57420	2018-07-18	\$3,047.05	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57421	2018-07-18	\$13,645.70	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57419	2018-07-18	\$8,687.03		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57593	2018-07-20	\$19,834.68		JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57436	2018-07-23	\$7,161.00	2593837	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57433	2018-07-23	\$7,590.68		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57595	2018-07-24	\$13,234.64		Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57597	2018-07-25	\$26,437.39	1994930	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57490	2018-07-26	\$19,803.35	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57501	2018-07-26	\$14,662.31	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57499	2018-07-26	\$28,655.93	2593837	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57494	2018-07-26	\$8,846.84		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57599	2018-07-27	\$26,457.30		JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57605	2018-07-31	\$19,180.07	1994930	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57603	2018-07-31	\$12,796.61		Gold & Silver Inc.. Gold & Silver Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57601	2018-07-31	\$16,017.84		JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57651	2018-08-03	\$9,758.20		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57673	2018-08-07	\$19,169.54	1994930	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57657	2018-08-07	\$7,222.26	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57676	2018-08-07	\$12,798.24		Gold & Silver Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57678	2018-08-07	\$15,986.89		JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57652	2018-08-08	\$19,739.81	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57824	2018-08-09	\$18,625.32		JK
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57826	2018-08-10	\$12,413.82		Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57726	2018-08-10	\$9,159.22		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57829	2018-08-13	\$24,834.74	1994930	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57721	2018-08-16	\$13,117.41	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57914	2018-08-17	\$19,804.52	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57909	2018-08-17	\$6,475.02		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57912	2018-08-17	\$7,108.54		Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57948	2018-08-20	\$18,890.55	1994930	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57950	2018-08-20	\$12,592.14		Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57951	2018-08-20	\$25,182.74		JK

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57946	2018-08-24	\$12,543.92	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57943	2018-08-25	\$25,062.43	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57942	2018-08-25	\$25,061.43	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57932	2018-08-27	\$16,728.52	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	57985	2018-08-31	\$15,273.37	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58132	2018-09-01	\$6,354.49	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58134	2018-09-03	\$25,370.88	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58130	2018-09-04	\$19,042.90	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58085	2018-09-05	\$8,042.94	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58088	2018-09-07	\$13,955.55	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58124	2018-09-08	\$6,353.88	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58091	2018-09-10	\$10,654.32	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58094	2018-09-10	\$6,409.03	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58128	2018-09-10	\$19,065.94	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58093	2018-09-10	\$612.88	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58126	2018-09-11	\$25,392.79	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58104	2018-09-11	\$8,181.18	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58109	2018-09-13	\$2,961.02	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58238	2018-09-17	\$24,962.77	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58240	2018-09-18	\$24,952.03	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58221	2018-09-19	\$3,940.29	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58308	2018-09-24	\$24,744.90	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58233	2018-09-24	\$20,909.41	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58225	2018-09-25	\$4,324.09	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58234	2018-09-27	\$14,139.64	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58230	2018-09-27	\$3,909.69	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58306	2018-09-28	\$24,745.80	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58293	2018-09-28	\$8,094.65	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58445	2018-10-01	\$18,577.32	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58404	2018-10-02	\$10,528.52	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58447	2018-10-05	\$31,870.09	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58422	2018-10-05	\$12,625.42	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58423	2018-10-05	\$12,465.13	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58421	2018-10-05	\$3,934.74	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58618	2018-10-05	\$6,397.61	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58449	2018-10-08	\$19,134.65	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58622	2018-10-12	\$12,790.70	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58624	2018-10-12	\$12,789.56	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58435	2018-10-12	\$10,551.40	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58436	2018-10-12	\$1,524.61	2337980 ontario inc	

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58620	2018-10-12	\$6,424.33	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58437	2018-10-12	\$8,992.25	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58439	2018-10-15	\$13,150.60	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58626	2018-10-15	\$19,194.66	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58507	2018-10-17	\$7,649.56	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58628	2018-10-18	\$19,191.40	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58630	2018-10-19	\$6,451.22	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58634	2018-10-22	\$19,291.00	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58562	2018-10-22	\$6,278.84	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58526	2018-10-22	\$7,388.37	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58521	2018-10-22	\$2,586.97	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58527	2018-10-22	\$30,557.88	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58529	2018-10-22	\$24,742.66	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58632	2018-10-22	\$19,287.95	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58563	2018-10-22	\$11,469.50	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58636	2018-10-26	\$19,475.28	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58638	2018-10-26	\$6,447.52	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58640	2018-10-29	\$19,410.03	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58661	2018-10-31	\$7,276.41	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58782	2018-11-02	\$16,177.96	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58784	2018-11-02	\$16,185.41	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58780	2018-11-02	\$12,949.24	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58786	2018-11-05	\$19,040.82	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58763	2018-11-06	\$8,035.60	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58788	2018-11-09	\$25,579.86	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58790	2018-11-12	\$18,845.77	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58772	2018-11-14	\$7,998.04	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58792	2018-11-15	\$25,898.25	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58883	2018-11-15	\$7,887.15	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58933	2018-11-19	\$25,552.34	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58885	2018-11-19	\$8,385.40	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58888	2018-11-20	\$19,568.22	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58935	2018-11-22	\$25,568.70	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58893	2018-11-23	\$9,218.50	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58937	2018-11-26	\$25,581.60	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58895	2018-11-26	\$8,456.62	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58896	2018-11-26	\$12,094.40	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58925	2018-11-27	\$12,970.48	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58939	2018-11-29	\$25,761.13	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58997	2018-11-29	\$6,728.64	2337980 ontario inc	

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	58999	2018-11-30	\$5,686.58	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59324	2018-12-03	\$26,361.83	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59180	2018-12-05	\$8,237.73	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59201	2018-12-06	\$13,584.19	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59234	2018-12-06	\$16,662.63	2665988 Ontario Ltd	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59326	2018-12-07	\$39,544.15	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59209	2018-12-10	\$7,575.31	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59213	2018-12-10	\$16,892.57	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59217	2018-12-10	\$18,254.32	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59207	2018-12-10	\$16,661.53	2665988 Ontario Ltd	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59328	2018-12-10	\$26,444.88	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59211	2018-12-10	\$12,926.47	KTI Corportation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59330	2018-12-14	\$39,545.96	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59221	2018-12-14	\$14,005.05	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59220	2018-12-14	\$7,829.84	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59332	2018-12-17	\$26,430.73	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59344	2018-12-19	\$14,256.74	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59345	2018-12-20	\$5,406.45	KTI Corportation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59346	2018-12-20	\$8,107.08	KTI Corportation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59367	2018-12-21	\$39,541.89	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59355	2018-12-21	\$6,624.82	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59369	2018-12-26	\$26,354.79	JK	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59347	2018-12-27	\$21,732.15	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59371	2018-12-28	\$39,545.71	1994930 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59465	2019-01-03	\$615.92	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59453	2019-01-08	\$7,831.94	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59487	2019-01-09	\$13,966.20	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59474	2019-01-09	\$6,825.12	KTI Corportation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59513	2019-01-15	\$14,358.26	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59578	2019-01-15	\$7,385.96	KTI Corportation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59583	2019-01-18	\$21,981.18	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59582	2019-01-18	\$7,532.33	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59602	2019-01-21	\$26,199.30	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59586	2019-01-22	\$6,209.14	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59639	2019-01-24	\$24,662.65	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59638	2019-01-24	\$4,451.72	KTI Corportation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59632	2019-01-24	\$7,378.22	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59733	2019-01-30	\$5,555.19	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59734	2019-01-30	\$10,666.33	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59738	2019-01-31	\$15,902.16	2337980 ontario inc	

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

**Audit period: 2013-04-01 to 2019-08-31**

**WP4903-2: 999 Input Tax Credit Claims**

**PROTECTED B**

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59826	2019-02-05	\$23,105.47	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59828	2019-02-07	\$7,905.62	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59934	2019-02-12	\$12,806.89	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59936	2019-02-12	\$12,817.40	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59928	2019-02-12	\$10,364.92	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59930	2019-02-12	\$13,349.98	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59932	2019-02-12	\$16,205.62	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59838	2019-02-13	\$15,334.39	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59842	2019-02-14	\$7,489.31	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	59996	2019-02-19	\$18,819.82	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60003	2019-02-21	\$9,365.07	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60010	2019-02-26	\$18,713.65	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60058	2019-02-27	\$10,455.35	2593837	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60011	2019-02-28	\$14,574.90	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60059	2019-02-28	\$8,101.63	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60156	2019-03-04	\$22,626.09	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60140	2019-03-05	\$21,356.49	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60158	2019-03-06	\$18,430.88	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60145	2019-03-07	\$7,967.73	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60148	2019-03-08	\$6,136.01	KTI Corporation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60160	2019-03-13	\$18,832.38	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60250	2019-03-14	\$8,071.81	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60297	2019-03-15	\$16,240.84	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60253	2019-03-20	\$29,468.08	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60285	2019-03-21	\$6,681.23	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60299	2019-03-22	\$12,807.70	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60260	2019-03-25	\$18,297.33	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60427	2019-03-27	\$14,703.96	2466778	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60457	2019-03-28	\$4,966.02	KTI Corporation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60651	2019-04-03	\$17,250.88	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60559	2019-04-04	\$21,775.10	2466778	Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60653	2019-04-05	\$17,398.45	1995891	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60562	2019-04-05	\$6,956.43	KTI Corporation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60563	2019-04-05	\$3,476.86	KTI Corporation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60803	2019-04-06	\$7,180.68	5010433	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60830	2019-04-10	\$14,156.27	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60831	2019-04-10	\$14,547.03	2337980	ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60835	2019-04-10	\$9,677.31	2593837	Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60834	2019-04-10	\$6,666.39	KTI Corporation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60836	2019-04-10	\$8,039.57	Naz Enterprises Inc	Naz Enterprises Inc

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60598	2019-04-11	\$7,653.25	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60657	2019-04-12	\$16,223.59	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60805	2019-04-13	\$6,843.66	5010433 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60582	2019-04-15	\$14,441.38	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60584	2019-04-15	\$22,777.06	2466778 Ontario Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60750	2019-04-16	\$3,472.78	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60659	2019-04-18	\$6,979.81	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60734	2019-04-18	\$6,430.37	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60807	2019-04-20	\$6,890.33	5010433 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60663	2019-04-22	\$17,348.02	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60754	2019-04-22	\$4,416.32	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60755	2019-04-22	\$14,431.15	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60757	2019-04-24	\$8,488.38	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60756	2019-04-24	\$5,403.60	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60740	2019-04-24	\$7,409.62	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60760	2019-04-25	\$13,807.86	2466778 Ontario Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60667	2019-04-25	\$6,978.18	Alvin Gold Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60809	2019-04-27	\$7,527.48	5010433 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60801	2019-04-29	\$14,378.46	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60935	2019-05-01	\$13,316.55	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60936	2019-05-01	\$2,865.72	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60934	2019-05-01	\$7,996.67	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60954	2019-05-02	\$6,243.57	2593837 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60937	2019-05-06	\$14,337.09	2466778 Ontario Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60957	2019-05-07	\$7,517.00	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60938	2019-05-08	\$14,607.06	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	60969	2019-05-14	\$7,938.90	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61070	2019-05-17	\$15,154.62	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61071	2019-05-17	\$24,484.20	2337980 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61073	2019-05-17	\$10,094.51	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61081	2019-05-21	\$11,287.79	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61078	2019-05-21	\$8,547.58	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61085	2019-05-21	\$1,847.37	Suhaag Jewellers Ltd	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61069	2019-05-23	\$9,746.62	2466778 Ontario Inc.	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61171	2019-05-24	\$6,303.08	1503329 Ontario Ltd	Gold City
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61169	2019-05-24	\$418.82	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61150	2019-05-25	\$13,817.36	2466778 Ontario Inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61121	2019-05-27	\$15,043.93	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61122	2019-05-27	\$21,979.45	1995891 ontario inc	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61134	2019-05-27	\$16,062.44	1995949 Ontario Inc	

**GST/HST Audit of 999 Gold Depot (Canada) Limited**

Audit period: 2013-04-01 to 2019-08-31

**WP4903-2: 999 Input Tax Credit Claims**

PROTECTED B

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61136	2019-05-27	\$14,915.45	1995949 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61130	2019-05-27	\$7,665.51	5010433 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61132	2019-05-27	\$8,105.32	5010433 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61126	2019-05-27	\$7,637.71	5010433 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61128	2019-05-27	\$7,672.20	5010433 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61116	2019-05-27	\$7,690.28	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61123	2019-05-27	\$8,067.88	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61124	2019-05-27	\$15,686.36	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61442	2019-05-28	\$10,623.88	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61163	2019-05-28	\$14,755.32	KTI Corporation KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61162	2019-05-28	\$7,901.83	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61229	2019-05-29	\$10,396.31	2388905 Ontario Inc A&Z Creations 2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61232	2019-05-29	\$7,163.07	2466778 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61311	2019-06-05	\$16,935.27	1995891 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61313	2019-06-05	\$11,990.75	1995949 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61307	2019-06-05	\$7,124.54	2466778 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61309	2019-06-05	\$5,646.98	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61345	2019-06-10	\$21,862.85	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61346	2019-06-10	\$3,662.08	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61343	2019-06-10	\$13,324.21	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61344	2019-06-10	\$3,530.74	2388905 Ontario Inc A&Z Creations 2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61358	2019-06-10	\$13,031.92	GTA Jewellery Loan Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61363	2019-06-10	\$6,990.26	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61355	2019-06-10	\$7,519.08	Naz Enterprises Inc Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61440	2019-06-11	\$24,827.39	2417916 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61439	2019-06-12	\$2,999.30	Suhaag Jewellers Ltd
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61470	2019-06-18	\$20,099.16	1995891 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61471	2019-06-18	\$16,753.14	1995949 Ontario Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61498	2019-06-19	\$3,667.24	2388905 Ontario Inc A&Z Creations 2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61499	2019-06-19	\$12,663.22	2466778 Ontario Inc.
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61476	2019-06-19	\$7,218.04	KTI Corporation KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61575	2019-06-25	\$14,144.16	Alvin Gold Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61568	2019-06-26	\$7,993.96	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61567	2019-06-26	\$16,591.96	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61735	2019-07-02	\$3,392.56	2388905 Ontario Inc A&Z Creations 2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61685	2019-07-03	\$17,620.15	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61686	2019-07-03	\$3,918.11	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61683	2019-07-04	\$7,444.69	KTI Corporation KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61786	2019-07-08	\$17,316.93	2337980 ontario inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61784	2019-07-08	\$8,158.68	Naz Enterprises Inc Naz Enterprises Inc

GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61809	2019-07-15	\$3,274.51	2388905 Ontario Inc A&Z Creations	2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61989	2019-07-18	\$6,782.77	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62006	2019-07-22	\$7,213.87	Naz Enterprises Inc	Naz Enterprises Inc
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62009	2019-07-24	\$7,354.71	1503329 Ontario Ltd Gold City	
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	61997	2019-07-26	\$7,536.55	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62098	2019-07-31	\$3,169.83	2388905 Ontario Inc A&Z Creations	2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62328	2019-08-09	\$4,393.28	2388905 Ontario Inc A&Z Creations	2388905 Ontar
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62757	2019-08-21	\$12,537.18	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62758	2019-08-21	\$11,608.13	KTI Corpotation	KTI Corporation
GST/HST Payable	HST (ON) on purchases (Input Tax Credit)	62756	2019-08-22	\$12,017.33	KTI Corpotation	KTI Corporation
	<b>TOTAL ITCs</b>			<b><u>\$15,658,841.56</u></b>		

***THIS IS EXHIBIT "E" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "AL AKSU", is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***



Sudbury ON P3A 5C1

999 GOLD DEPOT (CANADA)  
LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003985

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**RESULTS**

This notice explains the results of our audit (re)assessment of return(s) you have or may have previously filed. Please refer to the "Summary of (Re)Assessment" for the specific period(s) covered.

<b>Result of this (Re)Assessment</b>	\$	19,697,156.37
<b>Prior Balance</b>	\$	1,203,925.27 Cr
		=====
<b>Total Balance</b>	\$	18,493,231.10

Payments will not appear on this notice of assessment if we have not processed your payment yet. If you have already paid the balance owing, please ignore this message and accept our thanks.

To see the latest account information, including payment transactions, go to [canada.ca/my-cra-business-account](http://canada.ca/my-cra-business-account) on the CRA's website.

We may take legal action to collect debts that are not paid voluntarily.

Need to make a payment? Pre-authorized debit is now available for businesses. At your convenience, a pre-authorized debit agreement can be set up using the CRA's My Business Account service. For more information on payment options, go to [canada.ca/payments](http://canada.ca/payments).

Please keep this Notice of (Re)Assessment for your records.

For more information, phone or write to:

Greater Toronto Area West TSO  
5800 Hurontario Street  
Mississauga ON L5R 4B4  
Toll free number 1-800-959-8281 (Canada and United States)

Bob Hamilton  
Commissioner of Revenue





999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/01/01 To: 2016/01/31

**Reference Number: 16032000432360066**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 218,917.69 Cr	\$	57,234.57 Cr	\$	161,683.12
Section 285 Penalty	\$ 0.00	\$	40,420.78	\$	40,420.78
					=====
			<b>Net Adjustment</b>	\$	<b>202,103.90</b>
Interest and Penalty				\$	90,991.62
Arrears Interest				\$	90,991.62
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>293,095.52</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003986

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/02/01 To: 2016/02/29

**Reference Number: 16061000232360478**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 219,722.14 Cr	\$	\$ 53,650.90 Cr	\$	166,071.24
Section 285 Penalty	\$ 0.00	\$	\$ 41,517.81	\$	41,517.81
			<b>Net Adjustment</b>	\$	<b>207,589.05</b>
Interest and Penalty				\$	92,254.55
Arrears Interest				\$	299,843.60
			<b>Result of (Re)Assessment</b>	\$	<b>299,843.60</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/03/01 To: 2016/03/31

**Reference Number: 16092000332360007**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 231,549.89 Cr	\$	10,437.31 Cr	\$	221,112.58
Section 285 Penalty	\$ 0.00	\$	55,278.14	\$	55,278.14
			<b>Net Adjustment</b>	\$	<b>276,390.72</b>
Interest and Penalty				\$	121,067.57
Arrears Interest				\$	121,067.57
			<b>Result of (Re)Assessment</b>	\$	<b>397,458.29</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003987

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/04/01 To: 2016/04/30

**Reference Number: 16123000732360607**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 190,730.14 Cr	\$	22,571.35 Cr	\$	168,158.79
Section 285 Penalty	\$ 0.00	\$	42,039.69	\$	42,039.69
			<b>Net Adjustment</b>	\$	<b>210,198.48</b>
Interest and Penalty				\$	90,796.04
Arrears Interest				\$	300,994.52
			<b>Result of (Re)Assessment</b>	\$	<b>300,994.52</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
 \_\_\_\_\_  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/05/01 To: 2016/05/31

**Reference Number: 16153000232360776**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 321,069.57 Cr	\$	21,521.33 Cr	\$	299,548.24
Section 285 Penalty	\$ 0.00	\$	74,887.06	\$	74,887.06
					=====
			<b>Net Adjustment</b>	\$	<b>374,435.30</b>
Interest and Penalty				\$	159,487.62
Arrears Interest				\$	159,487.62
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>533,922.92</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003988

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/06/01 To: 2016/06/30

Reference Number: 16186000232360705

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 311,379.84 Cr	\$ 60,563.11 Cr	\$ 250,816.73
Section 285 Penalty	\$ 0.00	\$ 62,704.18	\$ 62,704.18
		<b>Net Adjustment</b>	<b>\$ 313,520.91</b>
Interest and Penalty			\$ 131,652.47
Arrears Interest			\$ 131,652.47
		<b>Result of (Re)Assessment</b>	<b>\$ 445,173.38</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/07/01 To: 2016/07/31

**Reference Number: 16215000432360221**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 336,354.03 Cr	\$	73,593.13 Cr	\$	262,760.90
Section 285 Penalty	\$ 0.00	\$	65,690.22	\$	65,690.22
					=====
			<b>Net Adjustment</b>	\$	<b>328,451.12</b>
Interest and Penalty				\$	136,052.72
Arrears Interest				\$	136,052.72
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>464,503.84</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003989

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/08/01 To: 2016/08/31

**Reference Number: 16245000232360218**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 416,995.52 Cr	\$	49,191.10 Cr	\$	367,804.42
Section 285 Penalty	\$ 0.00	\$	91,951.10	\$	91,951.10
					=====
			<b>Net Adjustment</b>	\$	<b>459,755.52</b>
Interest and Penalty				\$	187,570.80
Arrears Interest				\$	187,570.80
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>647,326.32</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/09/01 To: 2016/09/30

**Reference Number: 16277000232360545**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 451,929.97 Cr	\$	63,726.23 Cr	\$	388,203.74
Section 285 Penalty	\$ 0.00	\$	97,050.93	\$	97,050.93
			<b>Net Adjustment</b>	\$	<b>485,254.67</b>
Interest and Penalty				\$	195,161.20
Arrears Interest				\$	195,161.20
			<b>Result of (Re)Assessment</b>	\$	<b>680,415.87</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003990

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/10/01 To: 2016/10/31

Reference Number: 16306000232360826

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 327,193.98 Cr	\$ 49,027.20 Cr	\$ 278,166.78
Section 285 Penalty	\$ 0.00	\$ 69,541.69	\$ 69,541.69
		<b>Net Adjustment</b>	<b>\$ 347,708.47</b>
Interest and Penalty			\$ 137,795.45
Arrears Interest			\$ 485,503.92
		<b>Result of (Re)Assessment</b>	<b>\$ 485,503.92</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/11/01 To: 2016/11/30

**Reference Number: 16340000132360866**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 347,821.08 Cr	\$	32,806.04 Cr	\$	315,015.04
Section 285 Penalty	\$ 0.00	\$	78,753.76	\$	78,753.76
					=====
			<b>Net Adjustment</b>	\$	<b>393,768.80</b>
Interest and Penalty				\$	19.06
Refund Interest				\$	152,379.64
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>546,167.50</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003991

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/12/01 To: 2016/12/31

Reference Number: 17003000132360915

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 250,976.97 Cr	\$ 12,322.87 Cr	\$ 238,654.10
Section 285 Penalty	\$ 0.00	\$ 59,663.52	\$ 59,663.52
		<b>Net Adjustment</b>	<b>\$ 298,317.62</b>
Interest and Penalty			\$ 114,842.17
Arrears Interest			\$ 413,159.79
		<b>Result of (Re)Assessment</b>	<b>\$ 413,159.79</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/01/01 To: 2017/01/31

**Reference Number: 17032000332360778**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 433,055.61 Cr	\$	14,750.90	\$	447,806.51
Section 285 Penalty	\$ 0.00	\$	111,951.62	\$	111,951.62
			<b>Net Adjustment</b>	\$	<b>559,758.13</b>
Interest and Penalty				\$	210,913.57
Arrears Interest				\$	770,671.70
			<b>Result of (Re)Assessment</b>	\$	<b>770,671.70</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003992

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/02/01 To: 2017/02/28

**Reference Number: 17060000332360119**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 430,318.10 Cr	\$	\$ 55,177.98 Cr	\$	375,140.12
Section 285 Penalty	\$ 0.00	\$	\$ 93,785.03	\$	93,785.03
				=====	
			<b>Net Adjustment</b>	\$	<b>468,925.15</b>
Interest and Penalty				\$	174,093.52
Arrears Interest				\$	174,093.52
				=====	
			<b>Result of (Re)Assessment</b>	\$	<b>643,018.67</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
 \_\_\_\_\_  
  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/03/01 To: 2017/03/31

**Reference Number: 17093000332360128**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 484,343.68 Cr	\$	92,176.61 Cr	\$	392,167.07
Section 285 Penalty	\$ 0.00	\$	98,041.76	\$	98,041.76
					=====
			<b>Net Adjustment</b>	\$	<b>490,208.83</b>
Interest and Penalty				\$	178,910.83
Arrears Interest				\$	178,910.83
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>669,119.66</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003993

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/04/01 To: 2017/04/30

Reference Number: 17121000632360956

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 202,552.93 Cr	\$ 44,342.68 Cr	\$ 158,210.25
Section 285 Penalty	\$ 0.00	\$ 39,552.56	\$ 39,552.56
		<b>Net Adjustment</b>	<b>\$ 197,762.81</b>
Interest and Penalty			\$ 71,725.78
Arrears Interest			\$ 269,488.59
		<b>Result of (Re)Assessment</b>	<b>\$ 269,488.59</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/05/01 To: 2017/05/31

**Reference Number: 17152000232360655**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 235,161.80 Cr	\$	6,117.89 Cr	\$	229,043.91
Section 285 Penalty	\$ 0.00	\$	57,260.97	\$	57,260.97
					=====
			<b>Net Adjustment</b>	\$	<b>286,304.88</b>
Interest and Penalty				\$	102,110.99
Arrears Interest				\$	102,110.99
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>388,415.87</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003994

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/06/01 To: 2017/06/30

Reference Number: 17185000232360770

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 208,280.18 Cr	\$ 33,017.64 Cr	\$ 175,262.54
Section 285 Penalty	\$ 0.00	\$ 43,815.63	\$ 43,815.63
		<b>Net Adjustment</b>	<b>\$ 219,078.17</b>
Interest and Penalty			\$ 76,875.19
Arrears Interest			\$ 76,875.19
		<b>Result of (Re)Assessment</b>	<b>\$ 295,953.36</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/07/01 To: 2017/07/31

**Reference Number: 17213000232360793**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 196,294.89 Cr	\$	40,988.11 Cr	\$	155,306.78
Section 285 Penalty	\$ 0.00	\$	38,826.69	\$	38,826.69
			<b>Net Adjustment</b>	\$	<b>194,133.47</b>
Interest and Penalty				\$	67,068.02
Arrears Interest				\$	67,068.02
			<b>Result of (Re)Assessment</b>	\$	<b>261,201.49</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003995

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/08/01 To: 2017/08/31

Reference Number: 17244000132360807

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 387,508.69 Cr	\$ 55,568.53 Cr	\$ 331,940.16
Section 285 Penalty	\$ 0.00	\$ 82,985.04	\$ 82,985.04
		<b>Net Adjustment</b>	<b>\$ 414,925.20</b>
Interest and Penalty			\$ 140,873.53
Arrears Interest			\$ 140,873.53
		<b>Result of (Re)Assessment</b>	<b>\$ 555,798.73</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/09/01 To: 2017/09/30

**Reference Number: 17275000332360724**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 128,782.35 Cr	\$	43,122.64 Cr	\$	85,659.71
Section 285 Penalty	\$ 0.00	\$	21,414.92	\$	21,414.92
					=====
			<b>Net Adjustment</b>	\$	<b>107,074.63</b>
Interest and Penalty				\$	35,777.05
Arrears Interest				\$	35,777.05
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>142,851.68</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003996

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/10/01 To: 2017/10/31

Reference Number: 17305000232360779

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 185,636.14 Cr	\$ 84,321.15 Cr	\$ 101,314.99
Section 285 Penalty	\$ 0.00	\$ 25,328.74	\$ 25,328.74
		<b>Net Adjustment</b>	<b>\$ 126,643.73</b>
Interest and Penalty			\$ 41,641.29
Arrears Interest			\$ 168,285.02
		<b>Result of (Re)Assessment</b>	<b>\$ 168,285.02</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/11/01 To: 2017/11/30

**Reference Number: 17335000232360170**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 215,708.67 Cr	\$	54,820.78 Cr	\$	160,887.89
Section 285 Penalty	\$ 0.00	\$	40,221.97	\$	40,221.97
					=====
			<b>Net Adjustment</b>	\$	<b>201,109.86</b>
Interest and Penalty				\$	64,964.73
Arrears Interest				\$	64,964.73
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>266,074.59</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003997

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/12/01 To: 2017/12/31

Reference Number: 18005000232360336

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 231,252.90 Cr	\$ 31,759.40 Cr	\$ 199,493.50
Section 285 Penalty	\$ 0.00	\$ 49,873.37	\$ 49,873.37
		<b>Net Adjustment</b>	<b>\$ 249,366.87</b>
Interest and Penalty			\$ 79,011.23
Arrears Interest			\$ 328,378.10
		<b>Result of (Re)Assessment</b>	<b>\$ 328,378.10</b>

**EXPLANATION**

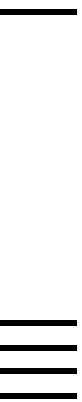
The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/01/01 To: 2018/01/31

**Reference Number: 18032000332360356**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 442,139.21 Cr	\$	115,014.13 Cr	\$	327,125.08
Section 285 Penalty	\$ 0.00	\$	81,781.27	\$	81,781.27
					=====
			<b>Net Adjustment</b>	\$	<b>408,906.35</b>
Interest and Penalty				\$	127,558.46
Arrears Interest				\$	127,558.46
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>536,464.81</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003998

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/02/01 To: 2018/02/28

**Reference Number: 18060000232360969**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 360,900.01 Cr	\$	58,377.20 Cr	\$	302,522.81
Section 285 Penalty	\$ 0.00	\$	75,630.70	\$	75,630.70
					=====
			<b>Net Adjustment</b>	\$	<b>378,153.51</b>
Interest and Penalty				\$	116,025.45
Arrears Interest				\$	116,025.45
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>494,178.96</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/03/01 To: 2018/03/31

**Reference Number: 18092000332360666**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 402,014.55 Cr	\$	99,753.43 Cr	\$	302,261.12
Section 285 Penalty	\$ 0.00	\$	75,565.28	\$	75,565.28
					=====
			<b>Net Adjustment</b>	\$	<b>377,826.40</b>
Interest and Penalty				\$	3.11
Refund Interest				\$	113,621.42
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>491,450.93</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003999

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/04/01 To: 2018/04/30

Reference Number: 18121000432360389

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 355,279.09 Cr	\$ 56,535.78 Cr	\$ 298,743.31
Section 285 Penalty	\$ 0.00	\$ 74,685.82	\$ 74,685.82
		<b>Net Adjustment</b>	<b>\$ 373,429.13</b>
Interest and Penalty			\$ 110,035.85
Arrears Interest			\$ 110,035.85
		<b>Result of (Re)Assessment</b>	<b>\$ 483,464.98</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/05/01 To: 2018/05/31

**Reference Number: 18152000332360357**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 480,585.74 Cr	\$	52,666.52 Cr	\$	427,919.22
Section 285 Penalty	\$ 0.00	\$	106,979.80	\$	106,979.80
					=====
			<b>Net Adjustment</b>	\$	<b>534,899.02</b>
Interest and Penalty				\$	79.00
Refund Interest				\$	151,924.31
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>686,902.33</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004000

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/06/01 To: 2018/06/30

Reference Number: 18184000332360017

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 492,988.62 Cr	\$ 64,510.39 Cr	\$ 428,478.23
Section 285 Penalty	\$ 0.00	\$ 107,119.55	\$ 107,119.55
		<b>Net Adjustment</b>	<b>\$ 535,597.78</b>
Interest and Penalty			\$ 150,632.20
Arrears Interest			\$ 150,632.20
		<b>Result of (Re)Assessment</b>	<b>\$ 686,229.98</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/07/01 To: 2018/07/31

**Reference Number: 18213000332360404**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 553,881.55 Cr	\$	65,905.77 Cr	\$	487,975.78
Section 285 Penalty	\$ 0.00	\$	121,993.94	\$	121,993.94
			<b>Net Adjustment</b>	\$	<b>609,969.72</b>
Interest and Penalty				\$	167,474.29
Arrears Interest				\$	167,474.29
			<b>Result of (Re)Assessment</b>	\$	<b>777,444.01</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004001

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/08/01 To: 2018/08/31

Reference Number: 18247000232360161

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 405,478.36 Cr	\$ 57,929.73 Cr	\$ 347,548.63
Section 285 Penalty	\$ 0.00	\$ 86,887.15	\$ 86,887.15
		<b>Net Adjustment</b>	<b>\$ 434,435.78</b>
Interest and Penalty			\$ 116,555.70
Arrears Interest			\$ 116,555.70
		<b>Result of (Re)Assessment</b>	<b>\$ 550,991.48</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/09/01 To: 2018/09/30

**Reference Number: 18274000232360908**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 337,241.32 Cr	\$	\$ 30,120.25 Cr	\$	307,121.07
Section 285 Penalty	\$ 0.00	\$	\$ 76,780.26	\$	76,780.26
			<b>Net Adjustment</b>	\$	<b>383,901.33</b>
Interest and Penalty				\$	100,714.26
Arrears Interest				\$	484,615.59
			<b>Result of (Re)Assessment</b>	\$	<b>484,615.59</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004002

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/10/01 To: 2018/10/31

Reference Number: 18305000232360479

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 503,419.14 Cr	\$ 94,962.96 Cr	\$ 408,456.18
Section 285 Penalty	\$ 0.00	\$ 102,114.04	\$ 102,114.04
		<b>Net Adjustment</b>	<b>\$ 510,570.22</b>
Interest and Penalty			\$ 130,521.65
Arrears Interest			\$ 641,091.87
		<b>Result of (Re)Assessment</b>	<b>\$ 641,091.87</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/11/01 To: 2018/11/30

**Reference Number: 18337000232360639**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 518,580.10 Cr	\$	\$ 174,409.39 Cr	\$	\$ 344,170.71
Section 285 Penalty	\$ 0.00	\$	\$ 86,042.67	\$	\$ 86,042.67
			<b>Net Adjustment</b>	<b>\$</b>	<b>430,213.38</b>
Interest and Penalty				\$	107,375.24
Arrears Interest				\$	107,375.24
			<b>Result of (Re)Assessment</b>	<b>\$</b>	<b>537,588.62</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004003

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/12/01 To: 2018/12/31

Reference Number: 19002000432360074

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 516,041.13 Cr	\$ 63,514.31 Cr	\$ 452,526.82
Section 285 Penalty	\$ 0.00	\$ 113,131.70	\$ 113,131.70
		<b>Net Adjustment</b>	<b>\$ 565,658.52</b>
Interest and Penalty			\$ 137,680.46
Arrears Interest			\$ 137,680.46
		<b>Result of (Re)Assessment</b>	<b>\$ 703,338.98</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/01/01 To: 2019/01/31

**Reference Number: 19032000332360338**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 313,336.98 Cr	\$	131,815.36 Cr	\$	181,521.62
Section 285 Penalty	\$ 0.00	\$	45,380.40	\$	45,380.40
					=====
			<b>Net Adjustment</b>	\$	<b>226,902.02</b>
Interest and Penalty				\$	53,784.40
Arrears Interest				\$	53,784.40
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>280,686.42</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004004

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/02/01 To: 2019/02/28

Reference Number: 19060000332360013

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 276,232.29 Cr	\$ 76,822.27 Cr	\$ 199,410.02
Section 285 Penalty	\$ 0.00	\$ 49,852.50	\$ 49,852.50
		<b>Net Adjustment</b>	<b>\$ 249,262.52</b>
Interest and Penalty			\$ 57,638.61
Arrears Interest			\$ 306,901.13
		<b>Result of (Re)Assessment</b>	<b>\$ 306,901.13</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/03/01 To: 2019/03/31

**Reference Number: 19091000732360115**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 301,103.80 Cr	\$	\$ 94,517.25 Cr	\$	206,586.55
Section 285 Penalty	\$ 0.00	\$	\$ 51,646.63	\$	51,646.63
			<b>Net Adjustment</b>	<b>\$</b>	<b>258,233.18</b>
Interest and Penalty				\$	58,190.61
Arrears Interest				\$	316,423.79
			<b>Result of (Re)Assessment</b>	<b>\$</b>	<b>316,423.79</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004005

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/04/01 To: 2019/04/30

Reference Number: 19121000532360008

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 391,612.23 Cr	\$ 72,585.96 Cr	\$ 319,026.27
Section 285 Penalty	\$ 0.00	\$ 79,756.56	\$ 79,756.56
		<b>Net Adjustment</b>	<b>\$ 398,782.83</b>
Interest and Penalty			\$ 87,442.69
Arrears Interest			\$ 87,442.69
		<b>Result of (Re)Assessment</b>	<b>\$ 486,225.52</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/05/01 To: 2019/05/31

**Reference Number: 19154000232360909**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 408,201.29 Cr	\$	50,309.84 Cr	\$	357,891.45
Section 285 Penalty	\$ 0.00	\$	89,472.86	\$	89,472.86
					=====
			<b>Net Adjustment</b>	\$	<b>447,364.31</b>
Interest and Penalty				\$	8,221.47
Arrears Interest				\$	8,221.47
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>455,585.78</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004006

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/06/01 To: 2019/06/30

**Reference Number: 19183000532360685**

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 421,338.93 Cr	\$ 146,479.60 Cr	\$ 274,859.33
Section 285 Penalty	\$ 0.00	\$ 68,714.83	\$ 68,714.83
		<b>Net Adjustment</b>	<b>\$ 343,574.16</b>
		<b>Result of (Re)Assessment</b>	<b>\$ 343,574.16</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

\_\_\_\_\_  
  
 \_\_\_\_\_  
  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/07/01 To: 2019/07/31

**Reference Number: 19213000332360780**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 207,476.36 Cr	\$	114,293.00 Cr	\$	93,183.36
Section 285 Penalty	\$ 0.00	\$	23,295.84	\$	23,295.84
			<b>Net Adjustment</b>	\$	<b>116,479.20</b>
			<b>Result of (Re)Assessment</b>	\$	<b>116,479.20</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004007

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/08/01 To: 2019/08/31

Reference Number: 19246000432360171

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 132,170.61 Cr	\$ 91,614.69 Cr	\$ 40,555.92
Section 285 Penalty	\$ 0.00	\$ 10,138.98	\$ 10,138.98
		<b>Net Adjustment</b>	<b>\$ 50,694.90</b>
		<b>Result of (Re)Assessment</b>	<b>\$ 50,694.90</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

**GENERAL INFORMATION**

For more information on Notices of (Re)Assessment, and your objection and appeal rights, see Guide RC4022, General Information for GST/HST Registrants, or visit [canada.ca/revenue-agency](http://canada.ca/revenue-agency). To prevent unnecessary delays when you correspond with us, please provide your Business Number.



**SEPARATOR PAGE**

Sudbury ON P3A 5C1

999 GOLD DEPOT (CANADA) LIMITED
901-27 QUEEN ST E
TORONTO ON M5C 2M6

Table with 3 rows: Date (March 2, 2023), Business Number (88745 5749 RT0001), Period Covered (Refer to Summary)

0003924

NOTICE OF (RE)ASSESSMENT
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)

RESULTS

This notice explains the results of our audit (re)assessment of return(s) you have or may have previously filed. Please refer to the "Summary of (Re)Assessment" for the specific period(s) covered.

Table with 2 columns: Description and Amount. Rows include Result of this (Re)Assessment, Prior Balance, and Total Balance.

Payments will not appear on this notice of assessment if we have not processed your payment yet. If you have already paid the balance owing, please ignore this message and accept our thanks.

To see the latest account information, including payment transactions, go to canada.ca/my-cra-business-account on the CRA's website.

We may take legal action to collect debts that are not paid voluntarily.

Need to make a payment? Pre-authorized debit is now available for businesses. At your convenience, a pre-authorized debit agreement can be set up using the CRA's My Business Account service.

Please keep this Notice of (Re)Assessment for your records.

For more information, phone or write to:

Greater Toronto Area West TSO
5800 Hurontario Street
Mississauga ON L5R 4B4
Toll free number 1-800-959-8281 (Canada and United States)

Bob Hamilton
Commissioner of Revenue



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/04/01 To: 2013/04/30

**Reference Number: 13121000332360226**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 127,683.77 Cr	\$	126,407.58 Cr	\$	1,276.19
Section 285 Penalty	\$ 0.00	\$	319.04	\$	319.04
					=====
			<b>Net Adjustment</b>	\$	<b>1,595.23</b>
Interest and Penalty				\$	1,065.38
Arrears Interest				\$	1,065.38
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>2,660.61</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003925

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/05/01 To: 2013/05/31

Reference Number: 13155000232360183

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 156,724.11 Cr	\$ 121,060.22 Cr	\$ 35,663.89
Section 285 Penalty	\$ 0.00	\$ 8,915.97	\$ 8,915.97
		<b>Net Adjustment</b>	<b>\$ 44,579.86</b>
Interest and Penalty			\$ 31.77
Refund Interest			\$ 29,046.76
Arrears Interest			\$ 73,658.39
		<b>Result of (Re)Assessment</b>	<b>\$ 73,658.39</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/06/01 To: 2013/06/30

**Reference Number: 13183000332360314**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 644,756.86 Cr	\$	585,457.08 Cr	\$	59,299.78
Section 285 Penalty	\$ 0.00	\$	14,824.94	\$	14,824.94
					=====
			<b>Net Adjustment</b>	\$	<b>74,124.72</b>
Interest and Penalty				\$	54.85
Refund Interest				\$	47,812.98
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>121,992.55</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003926

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/07/01 To: 2013/07/31

Reference Number: 13213000232360812

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 129,620.48 Cr	\$ 67,631.77 Cr	\$ 61,988.71
Section 285 Penalty	\$ 0.00	\$ 15,497.17	\$ 15,497.17
		<b>Net Adjustment</b>	<b>\$ 77,485.88</b>
Interest and Penalty			\$ 127.48
Refund Interest			\$ 49,137.74
Arrears Interest			
		<b>Result of (Re)Assessment</b>	<b>\$ 126,751.10</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/08/01 To: 2013/08/31

**Reference Number: 13247000132360840**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 113,157.28 Cr	\$	48,640.36 Cr	\$	64,516.92
Section 285 Penalty	\$ 0.00	\$	16,129.23	\$	16,129.23
					=====
			<b>Net Adjustment</b>	\$	<b>80,646.15</b>
Interest and Penalty				\$	48.62
Refund Interest				\$	51,088.61
Arrears Interest					=====
			<b>Result of (Re)Assessment</b>	\$	<b>131,783.38</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003927

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/09/01 To: 2013/09/30

Reference Number: 13274000232360811

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 179,040.35 Cr	\$ 94,343.67 Cr	\$ 84,696.68
Section 285 Penalty	\$ 0.00	\$ 21,174.17	\$ 21,174.17
		<b>Net Adjustment</b>	<b>\$ 105,870.85</b>
Interest and Penalty			\$ 67,050.70
Arrears Interest			\$ 67,050.70
		<b>Result of (Re)Assessment</b>	<b>\$ 172,921.55</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/10/01 To: 2013/10/31

**Reference Number: 13305000232360325**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 199,648.07 Cr	\$	61,715.99 Cr	\$	137,932.08
Section 285 Penalty	\$ 0.00	\$	34,483.02	\$	34,483.02
			<b>Net Adjustment</b>	\$	<b>172,415.10</b>
Interest and Penalty				\$	107,625.32
Arrears Interest				\$	107,625.32
			<b>Result of (Re)Assessment</b>	\$	<b>280,040.42</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003928

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/11/01 To: 2013/11/30

Reference Number: 13336000232360455

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 186,156.21 Cr	\$ 34,908.38 Cr	\$ 151,247.83
Section 285 Penalty	\$ 0.00	\$ 37,811.95	\$ 37,811.95
		<b>Net Adjustment</b>	<b>\$ 189,059.78</b>
Interest and Penalty			\$ 116,615.39
Arrears Interest			\$ 116,615.39
		<b>Result of (Re)Assessment</b>	<b>\$ 305,675.17</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/12/01 To: 2013/12/31

**Reference Number: 14002000232360250**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 203,969.85 Cr	\$	33,492.44 Cr	\$	170,477.41
Section 285 Penalty	\$ 0.00	\$	42,619.35	\$	42,619.35
					=====
			<b>Net Adjustment</b>	\$	<b>213,096.76</b>
Interest and Penalty				\$	111.79
Refund Interest				\$	128,207.01
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>341,415.56</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003929

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/01/01 To: 2014/01/31

Reference Number: 14034000132360681

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 192,189.94 Cr	\$ 57,355.80 Cr	\$ 134,834.14
Section 285 Penalty	\$ 0.00	\$ 33,708.53	\$ 33,708.53
		<b>Net Adjustment</b>	<b>\$ 168,542.67</b>
Interest and Penalty			\$ 101,529.75
Arrears Interest			\$ 270,072.42
		<b>Result of (Re)Assessment</b>	<b>\$ 270,072.42</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
\_\_\_\_\_  
  
\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/02/01 To: 2014/02/28

**Reference Number: 14062000232360031**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 185,490.44 Cr	\$	44,863.08 Cr	\$	140,627.36
Section 285 Penalty	\$ 0.00	\$	35,156.84	\$	35,156.84
					=====
			<b>Net Adjustment</b>	\$	<b>175,784.20</b>
Interest and Penalty				\$	104,790.75
Arrears Interest				\$	104,790.75
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>280,574.95</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003930

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/03/01 To: 2014/03/31

Reference Number: 14091000232360828

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 188,533.41 Cr	\$ 57,161.27 Cr	\$ 131,372.14
Section 285 Penalty	\$ 0.00	\$ 32,843.03	\$ 32,843.03
		<b>Net Adjustment</b>	<b>\$ 164,215.17</b>
Interest and Penalty			\$ 96,847.80
Arrears Interest			\$ 261,062.97
		<b>Result of (Re)Assessment</b>	<b>\$ 261,062.97</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/04/01 To: 2014/04/30

**Reference Number: 14121000332360267**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 311,269.05 Cr	\$	43,034.82 Cr	\$	268,234.23
Section 285 Penalty	\$ 0.00	\$	67,058.55	\$	67,058.55
					=====
			<b>Net Adjustment</b>	\$	<b>335,292.78</b>
Interest and Penalty				\$	195,309.61
Arrears Interest				\$	195,309.61
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>530,602.39</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003931

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/05/01 To: 2014/05/31

Reference Number: 14153000332360153

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 336,584.66 Cr	\$ 23,628.89 Cr	\$ 312,955.77
Section 285 Penalty	\$ 0.00	\$ 78,238.94	\$ 78,238.94
		<b>Net Adjustment</b>	<b>\$ 391,194.71</b>
Interest and Penalty			\$ 225,469.29
Arrears Interest			\$ 616,664.00
		<b>Result of (Re)Assessment</b>	<b>\$ 616,664.00</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

—  
  
=



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/06/01 To: 2014/06/30

**Reference Number: 14183000332360224**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 402,165.02 Cr	\$	77,308.33 Cr	\$	324,856.69
Section 285 Penalty	\$ 0.00	\$	81,214.17	\$	81,214.17
			<b>Net Adjustment</b>	\$	<b>406,070.86</b>
Interest and Penalty				\$	231,400.84
Arrears Interest				\$	637,471.70
			<b>Result of (Re)Assessment</b>	\$	<b>637,471.70</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003932

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/07/01 To: 2014/07/31

Reference Number: 14213000232360606

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 74,550.67 Cr	\$ 49,698.38 Cr	\$ 24,852.29
Section 285 Penalty	\$ 0.00	\$ 6,213.07	\$ 6,213.07
		<b>Net Adjustment</b>	<b>\$ 31,065.36</b>
Interest and Penalty			\$ 17,480.10
Arrears Interest			\$ 17,480.10
		<b>Result of (Re)Assessment</b>	<b>\$ 48,545.46</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/09/01 To: 2014/09/30

**Reference Number: 14274000232360684**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 374,938.55 Cr	\$	354,452.55 Cr	\$	20,486.00
Section 285 Penalty	\$ 0.00	\$	5,121.50	\$	5,121.50
					=====
			<b>Net Adjustment</b>	\$	<b>25,607.50</b>
Interest and Penalty				\$	14,093.46
Arrears Interest				\$	14,093.46
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>39,700.96</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003933

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/11/01 To: 2014/11/30

Reference Number: 14335000332360060

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 58,499.68 Cr	\$ 47,344.74 Cr	\$ 11,154.94
Section 285 Penalty	\$ 0.00	\$ 2,788.73	\$ 2,788.73
		<b>Net Adjustment</b>	<b>\$ 13,943.67</b>
Interest and Penalty			\$ 7,494.22
Arrears Interest			\$ 7,494.22
		<b>Result of (Re)Assessment</b>	<b>\$ 21,437.89</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/12/01 To: 2014/12/31

**Reference Number: 15005000332360305**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 48,802.98 Cr	\$	6,158.30 Cr	\$	42,644.68
Section 285 Penalty	\$ 0.00	\$	10,661.17	\$	10,661.17
					=====
			<b>Net Adjustment</b>	\$	<b>53,305.85</b>
Interest and Penalty				\$	38.79
Refund Interest				\$	27,799.05
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>81,143.69</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003934

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/01/01 To: 2015/01/31

Reference Number: 15034000332360052

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 170,492.29 Cr	\$ 69,465.25 Cr	\$ 101,027.04
Section 285 Penalty	\$ 0.00	\$ 25,256.76	\$ 25,256.76
		<b>Net Adjustment</b>	<b>\$ 126,283.80</b>
Interest and Penalty			\$ 65,735.85
Arrears Interest			\$ 192,019.65
		<b>Result of (Re)Assessment</b>	<b>\$ 192,019.65</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/02/01 To: 2015/02/28

**Reference Number: 15061000332360077**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 146,830.61 Cr	\$	51,432.86 Cr	\$	95,397.75
Section 285 Penalty	\$ 0.00	\$	23,849.43	\$	23,849.43
			<b>Net Adjustment</b>	\$	<b>119,247.18</b>
Interest and Penalty				\$	61,824.92
Arrears Interest				\$	61,824.92
			<b>Result of (Re)Assessment</b>	\$	<b>181,072.10</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/04/01 To: 2015/04/30

**Reference Number: 15121000332360249**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 172,845.21 Cr	\$	\$ 32,045.35 Cr	\$	140,799.86
Section 285 Penalty	\$ 0.00	\$	\$ 35,199.96	\$	35,199.96
			<b>Net Adjustment</b>	\$	<b>175,999.82</b>
Interest and Penalty				\$	88,909.02
Arrears Interest				\$	88,909.02
			<b>Result of (Re)Assessment</b>	\$	<b>264,908.84</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/06/01 To: 2015/06/30

**Reference Number: 15183000232360368**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 1,212,010.00 Cr	\$	1,069,170.15 Cr	\$	142,839.85
Section 285 Penalty	\$ 0.00	\$	35,709.96	\$	35,709.96
					=====
			<b>Net Adjustment</b>	\$	<b>178,549.81</b>
Interest and Penalty				\$	117.44
Refund Interest				\$	86,641.46
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>265,308.71</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003937

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/07/01 To: 2015/07/31

Reference Number: 15217000232360122

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 81,446.68 Cr	\$ 47,874.01 Cr	\$ 33,572.67
Section 285 Penalty	\$ 0.00	\$ 8,393.16	\$ 8,393.16
		<b>Net Adjustment</b>	<b>\$ 41,965.83</b>
Interest and Penalty			\$ 12.65
Refund Interest			\$ 20,177.67
Arrears Interest			\$ 62,156.15
		<b>Result of (Re)Assessment</b>	<b>\$ 62,156.15</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/09/01 To: 2015/09/30

**Reference Number: 15274000232360700**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 238,683.63 Cr	\$	\$ 54,207.03 Cr	\$	184,476.60
Section 285 Penalty	\$ 0.00	\$	\$ 46,119.15	\$	46,119.15
			<b>Net Adjustment</b>	\$	<b>230,595.75</b>
Interest and Penalty				\$	109,365.15
Arrears Interest				\$	109,365.15
			<b>Result of (Re)Assessment</b>	\$	<b>339,960.90</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003938

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/10/01 To: 2015/10/31

Reference Number: 15306000632360449

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 222,791.04 Cr	\$ 17,415.58 Cr	\$ 205,375.46
Section 285 Penalty	\$ 0.00	\$ 51,343.86	\$ 51,343.86
		<b>Net Adjustment</b>	<b>\$ 256,719.32</b>
Interest and Penalty			\$ 120,202.80
Arrears Interest			\$ 376,922.12
		<b>Result of (Re)Assessment</b>	<b>\$ 376,922.12</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

—  
  
=



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/11/01 To: 2015/11/30

**Reference Number: 15335000232360938**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 161,364.22 Cr	\$	6,001.04 Cr	\$	155,363.18
Section 285 Penalty	\$ 0.00	\$	38,840.79	\$	38,840.79
			<b>Net Adjustment</b>	\$	<b>194,203.97</b>
Interest and Penalty				\$	89,816.64
Arrears Interest				\$	89,816.64
			<b>Result of (Re)Assessment</b>	\$	<b>284,020.61</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003939

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/12/01 To: 2015/12/31

Reference Number: 16004000332360532

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 164,642.19 Cr	\$ 41,039.05 Cr	\$ 123,603.14
Section 285 Penalty	\$ 0.00	\$ 30,900.78	\$ 30,900.78
		<b>Net Adjustment</b>	<b>\$ 154,503.92</b>
Interest and Penalty			\$ 70,425.85
Arrears Interest			\$ 70,425.85
		<b>Result of (Re)Assessment</b>	<b>\$ 224,929.77</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

**GENERAL INFORMATION**

For more information on Notices of (Re)Assessment, and your objection and appeal rights, see Guide RC4022, General Information for GST/HST Registrants, or visit [canada.ca/revenue-agency](http://canada.ca/revenue-agency). To prevent unnecessary delays when you correspond with us, please provide your Business Number.



***THIS IS EXHIBIT "F" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "AL AKSU", is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***

RAPPORT DE VÉRIFICATION DE TRANSMISSION

HEURE : 05/10/2023 16:29  
NOM : OSLER  
FAX : 5149048101  
TÉL : 5149048100  
#SER. : 000F9V678636

DATE, HEURE 05/10 16:18  
NUMÉRO/NOM FAX 917056706649  
DURÉE 00:10:48  
PAGE(S) 33  
RÉSULTAT OK  
MODE STANDARD

Osler, Hoskin & Harcourt LLP  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

OSLER

Montréal

Toronto

Calgary

Ottawa

Vancouver

New York

## Facsimile transmission

To:	City:	Telephone:	Fax:
Name/Company Chief of Appeals Appeals Intake Centre Canada Revenue Agency			705-670-6649
From:	Ref No.:	Date:	No. of pages:
Louis Tassé 514.904.8170 ltasse@osler.com	1234478	May 10, 2023	33 (including cover)

999 Gold Depot (Canada) Limited  
Business No. 887455749 RT0001  
Notice of Objection for Reporting Periods from April 1st, 2013 to August 31, 2019

Please find attached to this letter the above-mentioned taxpayer's Notice of Objection in respect of the Notices of Reassessment dated March 2, 2023 for the above-mentioned reporting periods.

Please note that due to the size of the document, Appendix A (Notices of Reassessment) to the

Osler, Hoskin & Harcourt LLP  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

OSLER

Montréal  
Toronto  
Calgary  
Ottawa  
Vancouver  
New York

## Facsimile transmission

<b>To:</b> Name/Company Chief of Appeals Appeals Intake Centre Canada Revenue Agency	<b>City:</b>	<b>Telephone:</b>	<b>Fax:</b>  705-670-6649
<b>From:</b> Louis Tassé 514.904.8170 ltasse@osler.com	<b>Ref No.:</b> 1234478	<b>Date:</b> May 10, 2023	<b>No. of pages:</b> 33 (including cover)

**999 Gold Depot (Canada) Limited**  
**Business No. 887455749 RT0001**  
**Notice of Objection for Reporting Periods from April 1st, 2013 to August 31, 2019**

Please find attached to this letter the above-mentioned taxpayer's Notice of Objection in respect of the Notices of Reassessment dated March 2, 2023 for the above-mentioned reporting periods.

Please note that due to the size of the document, Appendix A (Notices of Reassessment) to the attached Notice of Objection will follow by registered mail only.

**NOTICE:** This communication is intended to be received only by the individual or entity to whom or to which it is addressed and contains information that is privileged, confidential and subject to copyright. Any unauthorized use, copying, review or disclosure is prohibited. Please notify the sender immediately if you received this communication in error by calling 514.904.8100 (calling collect, if necessary) so that we can arrange for its return at our expense. Thank you for your assistance and cooperation.

**Tracking number:**

RN494423721CA

**Delivered**

**Shipping service:** Registered Mail

**Delivery standard:** May 16

**Reason for delivery standard date change:** Item was received by Canada Post after cut-off time.

**Latest updates**

Date	Time	Location	Progress	Post office
May 12	10:35 am		Signature available	
May 12	10:35 am	NEWMARKET,ON	Delivered	
May 12	10:13 am	NEWMARKET,ON	Item available for pickup at Post Office	NEWMARKET MAIN PO
May 12	7:45 am	NEWMARKET,ON	Item in transit to Post Office	
May 12	7:28 am	NEWMARKET,ON	Item processed	
May 10	9:56 pm	MONTREAL,QC	Item processed	
May 10	5:34 pm	SAINT-LAURENT,QC	Item accepted at the Post Office	

**Features and options**

Signature Required

Flex Delivery



**REGISTERED  
DOMESTIC**

**RECOMMANDÉ  
RÉGIME INTÉRIEUR**



**J DU CLIENT**

Chief of Appeals  
Appeals Intake Centre  
Canada Revenue Agency  
P.O. Box 2006, Station Main  
Newmarket, ON L3Y 0E9

FOR DELIVERY  
CONFIRMATION

CONFIRMATION  
DE LA LIVRAISON

canadapost.ca

postescanada.ca

or/ou

1 888 550-6333

Declared Valeur  
Value déclarée

**\$1234478-5633**

CPC Tracking Number Numéro de repérage de la SCP

**RN 494 423 721 CA**

33-086-584 (17-12)

**REGISTERED**

Fragile and perishable articles are not indemnified against damage. Indemnity and fees information is available on request at your postal outlet.

**Instructions**

- 1) Complete any declared value on receipt, tear on perforated line, date stamp on reverse and give receipt to customer.
- 2) Remove label from backing (except area indicated) and apply the label to front of item adjacent to address.

Apply label here  
Veuillez placer l'étiquette ici



**RECOMMANDÉ**

Aucune indemnité ne sera versée pour l'avarie d'un objet fragile ou périssable. Des renseignements sur les indemnités et les droits sont disponibles à votre bureau postal.

**Instructions**

- 1) Indiquez la valeur déclarée dans la section Reçu, détachez le long du perforé, apposez le timbre à date au verso et remettez le reçu au client.
- 2) Décollez la pellicule protectrice (sauf la région indiquée) de l'étiquette. Apposez l'étiquette sur le devant de l'envoi, près de l'adresse.

ACCEPTING LOCATION

LIEU D'ACCEPTATION

CANADA POST		POSTES CANADA
130001		
2023 -05- 1 0		
BP NORTHGATE SAINT-LAURENT, QC H4L 3M0		

**Osler, Hoskin & Harcourt LLP**  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

**OSLER**

Montréal

May 10, 2023

Louis Tassé  
Direct Dial: 514.904.8170  
ltasse@osler.com

Toronto

Our Matter Number: 1234478

Calgary

Ottawa

**Sent By Registered Mail and Facsimile (705-670-6649)**

Vancouver

Chief of Appeals  
Appeals Intake Centre  
Canada Revenue Agency  
P.O. Box 2006, Station Main  
Newmarket, ON L3Y 0E9

New York

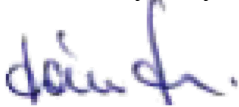
Dear Sirs/Mesdames:

**999 Gold Depot (Canada) Limited**  
**Business No. 88745 5749 RT0001**  
**Notice of Objection for Reporting Periods from April 1<sup>st</sup>, 2013 to August 31, 2019**

Please find enclosed the Notice of Objection of 999 Gold Depot (Canada) Limited served on you pursuant to subsection 81.15(1) of the *Excise Tax Act* in respect of the Notices of Reassessment dated March 2, 2023 for the above-mentioned reporting periods.

A copy of the Notices of Reassessment has been included with the Notice of Objection as Appendix A for your reference.

Yours very truly,



Louis Tassé

LT:jp

Encl.



### Notice of Objection (GST/HST)

Before completing this form, read the instructions on the back.

Name <b>999 GOLD DEPOT (CANADA) LIMITED</b>	Telephone number
Mailing address <b>901-27 QUEEN STREET EAST, TORONTO, ONTARIO, M5C 2M6</b>	

If possible, enclose a copy of the notice of assessment or notice of reassessment that you are objecting to, otherwise, give the following information.

Tick here if notice is attached

Notice Number	See attached Schedule 1 for Notice Numbers
Amount in dispute	See attached Schedule 1 for Amounts in Dispute
Date the notice was sent	<b>2023-03-02</b>
Social insurance number or Business Number	▶ <b>887455749RT0001</b>

Please state the facts and reasons for your objection (if you need more room, add a separate sheet).

**SEE ATTACHED APPENDIX STATEMENT OF FACTS AND REASONS.**

Tick here if a separate sheet is attached .

Name and address of authorized representative (if applicable): <b>OSLER HOSKIN &amp; HARCOURT LLP ATTN: ALAN KENIGSBERG, LOUIS TASSÉ First Canadian Place, 100, 1 King St W Suite 6200, Toronto, ON M5X 1B8</b>	Telephone number <b>416-362-2111</b>
--	---

 _____ Signature	<b>Director</b> _____ Position or Office	<b>2023/05/04</b> _____ Year Month Day
<small>For a corporation, we need the signature of an authorized person.</small>		

# **SCHEDULE 1**

**SCHEDULE 1**

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2013/04/01 to 2013/04/30	13121000332360226	Net Tax: \$1,276.19 S. 285 Penalty: \$319.04 Arrears Interest: \$1,065.38
2013/05/01 to 2013/05/31	13155000232360183	Net Tax: \$3,5663.89 S. 285 Penalty: \$8,915.97 Arrears Interest: \$29,046.76 Refund Interest: \$31.77
2013/06/01 to 2013/06/30	13183000332360314	Net Tax: \$59,299.78 S. 285 Penalty: \$14,824.94 Arrears Interest: \$47,812.98 Refund Interest: \$54.85
2013/07/01 to 2013/07/31	13213000232360812	Net Tax: \$61,988.71 S. 285 Penalty: \$15,497.17 Arrears Interest: \$49,137.74 Refund Interest: \$127.48
2013/08/01 to 2013/08/31	13247000132360840	Net Tax: \$64,516.92 S. 285 Penalty: \$16,129.23 Arrears Interest: \$51,088.61 Refund Interest: \$48.62
2013/09/01 to 2013/09/30	13274000232360811	Net Tax: \$84,696.68 S. 285 Penalty: \$21,174.17 Arrears Interest: \$67,050.70
2013/10/01 to 2013/10/31	13305000232360325	Net Tax: \$137,932.08 S. 285 Penalty: \$34,483.02 Arrears Interest: \$107,625.32
2013/11/01 to 2013/11/30	13336000232360455	Net Tax: \$151,247.83 S. 285 Penalty: \$37,811.95 Arrears Interest: \$116,615.39
2013/12/01 to 2013/12/31	14002000232360250	Net Tax: \$170,477.41 S. 285 Penalty: \$42,619.35 Arrears Interest: \$128,207.01 Refund Interest: \$111.79

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2014/01/01 to 2014/01/31	14034000132360681	Net Tax: \$134,834.14 S. 285 Penalty: \$33,708.53 Arrears Interest: \$101,529.75
2014/02/01 to 2014/02/28	14062000232360031	Net Tax: \$140,627.36 S. 285 Penalty: \$35,156.84 Arrears Interest: \$104,790.75
2014/03/01 to 2014/03/31	14091000232360828	Net Tax: \$131,372.14 S. 285 Penalty: \$32,843.03 Arrears Interest: \$96,847.80
2014/04/01 to 2014/04/30	14121000332360267	Net Tax: \$268,234.23 S. 285 Penalty: \$67,058.55 Arrears Interest: \$195,309.61
2014/05/01 to 2014/05/31	14153000332360153	Net Tax: \$312,955.77 S. 285 Penalty: \$78,238.94 Arrears Interest: \$225,469.29
2014/06/01 to 2014/06/30	14183000332360224	Net Tax: \$324,856.69 S. 285 Penalty: \$81,214.17 Arrears Interest: \$231,400.84
2014/07/01 to 2014/07/31	14213000232360606	Net Tax: \$24,852.29 S. 285 Penalty: \$6,213.07 Arrears Interest: \$17,480.10
2014/09/01 to 2014/09/30	14274000232360684	Net Tax: \$20,486.00 S. 285 Penalty: \$5,121.50 Arrears Interest: \$14,093.46
2014/11/01 to 2014/11/30	14335000332360060	Net Tax: \$11,154.94 S. 285 Penalty: \$2,788.73 Arrears Interest: \$7,494.22
2014/12/01 to 2014/12/31	15005000332360305	Net Tax: \$42,644.68 S. 285 Penalty: \$10,661.17 Arrears Interest: \$27,799.05 Refund Interest: \$38.79
2015/01/01 to 2015/01/31	15034000332360052	Net Tax: \$101,027.04 S. 285 Penalty: \$25,256.76 Arrears Interest: \$65,735.85

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2015/02/01 to 2015/02/28	15061000332360077	Net Tax: \$95,397.75 S. 285 Penalty: \$23,849.43 Arrears Interest: \$61,824.92
2015/03/01 to 2015/03/31	15091000332360259	Net Tax: \$138,469.71 S. 285 Penalty: \$34,617.42 Arrears Interest: \$88,517.50
2015/04/01 to 2015/04/30	15121000332360249	Net Tax: \$140,799.86 S. 285 Penalty: \$35,199.96 Arrears Interest: \$88,909.02
2015/05/01 to 2015/05/31	15152000232360537	Net Tax: \$156,969.06 S. 285 Penalty: \$39,242.26 Arrears Interest: \$98,037.04
2015/06/01 to 2015/06/30	15183000232360368	Net Tax: \$142,839.85 S. 285 Penalty: \$35,709.96 Arrears Interest: \$86,641.46 Refund Interest: \$117.44
2015/07/01 to 2015/07/31	15217000232360122	Net Tax: \$33,572.67 S. 285 Penalty: \$8,393.16 Arrears Interest: \$20,177.67 Refund Interest: \$12.65
2015/09/01 to 2015/09/30	15274000232360700	Net Tax: \$184,476.60 S. 285 Penalty: \$46,119.15 Arrears Interest: \$109,365.15
2015/10/01 to 2015/10/31	15306000632360449	Net Tax: \$205,375.46 S. 285 Penalty: \$51,343.86 Arrears Interest: \$120,202.80
2015/11/01 to 2015/11/30	15335000232360938	Net Tax: \$155,363.18 S. 285 Penalty: \$38,840.79 Arrears Interest: \$89,816.64
2015/12/01 to 2015/12/31	16004000332360532	Net Tax: \$123,603.14 S. 285 Penalty: \$30,900.78 Arrears Interest: \$70,425.85
2016/01/01 to 2016/01/31	16032000432360066	Net Tax: \$161,683.12 S. 285 Penalty: \$40,420.78 Arrears Interest: \$90,991.62

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2016/02/01 to 2016/02/29	16061000232360478	Net Tax: \$166,071.24 S. 285 Penalty: \$41,517.81 Arrears Interest: \$92,254.55
2016/03/01 to 2016/03/31	16092000332360007	Net Tax: \$221,112.58 S. 285 Penalty: \$55,278.14 Arrears Interest: \$121,067.57
2016/04/01 to 2016/04/30	16123000732360607	Net Tax: \$168,158.79 S. 285 Penalty: \$42,039.69 Arrears Interest: \$90,796.04
2016/05/01 to 2016/05/31	16153000232360776	Net Tax: \$299,548.24 S. 285 Penalty: \$74,887.06 Arrears Interest: \$159,487.62
2016/06/01 to 2016/06/30	16186000232360705	Net Tax: \$250,816.73 S. 285 Penalty: \$62,704.18 Arrears Interest: \$131,652.47
2016/07/01 to 2016/07/31	16215000432360221	Net Tax: \$262,760.90 S. 285 Penalty: \$65,690.22 Arrears Interest: \$136,052.72
2016/08/01 to 2016/08/31	16245000232360218	Net Tax: \$367,804.42 S. 285 Penalty: \$91,951.10 Arrears Interest: \$187,570.80
2016/09/01 to 2016/09/30	16277000232360545	Net Tax: \$388,203.74 S. 285 Penalty: \$97,050.93 Arrears Interest: \$195,161.20
2016/10/01 to 2016/10/31	16306000232360826	Net Tax: \$278,166.78 S. 285 Penalty: \$69,541.69 Arrears Interest: \$137,795.45
2016/11/01 to 2016/11/30	16340000132360866	Net Tax: \$315,015.04 S. 285 Penalty: \$78,753.76 Arrears Interest: \$152,379.64 Refund Interest: \$19.06
2016/12/01 to 2016/12/31	17003000132360915	Net Tax: \$238,654.10 S. 285 Penalty: \$59,663.52 Arrears Interest: \$114,842.17

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2017/01/01 to 2017/01/31	17032000332360778	Net Tax: \$447,806.51 S. 285 Penalty: \$111,951.62 Arrears Interest: \$210,913.57
2017/02/01 to 2017/02/28	17060000332360119	Net Tax: \$375,140.12 S. 285 Penalty: \$93,785.03 Arrears Interest: \$174,093.52
2017/03/01 to 2017/03/31	17093000332360128	Net Tax: \$392,167.07 S. 285 Penalty: \$98,041.76 Arrears Interest: \$178,910.83
2017/04/01 to 2017/04/30	17121000632360956	Net Tax: \$158,210.25 S. 285 Penalty: \$39,552.56 Arrears Interest: \$71,725.78
2017/05/01 to 2017/05/31	17152000232360655	Net Tax: \$229,043.91 S. 285 Penalty: \$57,260.97 Arrears Interest: \$102,110.99
2017/06/01 to 2017/06/30	17185000232360770	Net Tax: \$175,262.54 S. 285 Penalty: \$43,815.63 Arrears Interest: \$76,875.19
2017/07/01 to 2017/07/31	17213000232360793	Net Tax: \$155,306.78 S. 285 Penalty: \$38,826.69 Arrears Interest: \$67,068.02
2017/08/01 to 2017/08/31	17244000132360807	Net Tax: \$331,940.16 S. 285 Penalty: \$82,985.04 Arrears Interest: \$140,873.53
2017/09/01 to 2017/09/30	17275000332360724	Net Tax: \$85,659.71 S. 285 Penalty: \$21,414.92 Arrears Interest: \$35,777.05
2017/10/01 to 2017/10/31	17305000232360779	Net Tax: \$101,314.99 S. 285 Penalty: \$25,328.74 Arrears Interest: \$41,641.29
2017/11/01 to 2017/11/30	17335000232360170	Net Tax: \$160,887.89 S. 285 Penalty: \$40,221.97 Arrears Interest: \$64,964.73

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2017/12/01 to 2017/12/31	18005000232360336	Net Tax: \$199,493.50 S. 285 Penalty: \$49,873.37 Arrears Interest: \$79,011.23
2018/01/01 to 2018/01/31	18032000332360356	Net Tax: \$327,125.08 S. 285 Penalty: \$81,781.27 Arrears Interest: \$127,558.46
2018/02/01 to 2018/02/28	18060000232360969	Net Tax: \$302,522.81 S. 285 Penalty: \$75,630.70 Arrears Interest: \$116,025.45
2018/03/01 to 2018/03/31	18092000332360666	Net Tax: \$302,261.12 S. 285 Penalty: \$75,565.28 Arrears Interest: \$113,621.42 Refund Interest: \$3.11
2018/04/01 to 2018/04/30	18121000432360389	Net Tax: \$298,743.31 S. 285 Penalty: \$74,685.82 Arrears Interest: \$110,035.85
2018/05/01 to 2018/05/31	18152000332360357	Net Tax: \$427,919.22 S. 285 Penalty: \$106,979.80 Arrears Interest: \$151,924.31 Refund Interest: 79.00
2018/06/01 to 2018/06/30	18184000332360017	Net Tax: \$428,478.23 S. 285 Penalty: \$107,119.55 Arrears Interest: \$150,632.20
2018/07/01 to 2018/07/31	18213000332360404	Net Tax: \$487,975.78 S. 285 Penalty: \$121,993.94 Arrears Interest: \$167,474.29
2018/08/01 to 2018/08/31	18247000232360161	Net Tax: \$347,548.63 S. 285 Penalty: \$86,887.15 Arrears Interest: \$116,555.70
2018/09/01 to 2018/09/30	18274000232360908	Net Tax: \$307,121.07 S. 285 Penalty: \$76,780.26 Arrears Interest: \$100,714.26
2018/10/01 to 2018/10/31	18305000232360479	Net Tax: \$408,456.18 S. 285 Penalty: \$102,114.04 Arrears Interest: \$130,521.65

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2018/11/01 to 2018/11/30	18337000232360639	Net Tax: \$344,170.71 S. 285 Penalty: \$86,042.67 Arrears Interest: \$107,375.24
2018/12/01 to 2018/12/31	19002000432360074	Net Tax: \$452,526.82 S. 285 Penalty: \$113,131.70 Arrears Interest: \$137,680.46
2019/01/01 to 2019/01/31	19032000332360338	Net Tax: \$181,521.62 S. 285 Penalty: \$45,380.40 Arrears Interest: \$53,784.40
2019/02/01 to 2019/02/28	19060000332360013	Net Tax: \$199,410.02 S. 285 Penalty: \$49,852.50 Arrears Interest: \$57,638.61
2019/03/01 to 2019/03/31	19091000732360115	Net Tax: \$206,586.55 S. 285 Penalty: \$51,646.63 Arrears Interest: \$58,190.61
2019/04/01 to 2019/04/30	19121000532360008	Net Tax: \$319,026.27 S. 285 Penalty: \$79,756.56 Arrears Interest: \$87,442.69
2019/05/01 to 2019/05/31	19154000232360909	Net Tax: \$357,891.45 S. 285 Penalty: \$89,472.86 Arrears Interest: \$8,221.47
2019/06/01 to 2019/06/30	19183000532360685	Net Tax: \$274,859.33 S. 285 Penalty: \$68,714.83 Arrears Interest: \$0.00
2019/07/01 to 2019/07/31	19213000332360780	Net Tax: \$93,183.36 S. 285 Penalty: \$23,295.84 Arrears Interest: \$0.00
2019/08/01 to 2019/08/31	19246000432360171	Net Tax: \$40,555.92 S. 285 Penalty: \$10,138.98 Arrears Interest: \$0.00

**Statement of Facts and Reasons**  
**999 Gold Depot (Canada) Limited**  
**Business No. 88745 5749 RT0001**  
**Attachment to Notices of Objection for**  
**The Periods from April 1, 2013 to August 31, 2019**

**I. INTRODUCTION**

1. 999 Gold Depot (Canada) Limited (“**999 Gold**”) objects to the Notices of Assessment issued to it dated March 2, 2023 (the “**Assessments**”) for the reporting periods from April 1, 2013 to August 31, 2019 (the “**Relevant Periods**”). The Assessments increased 999 Gold’s liability under the *Excise Tax Act* (the “**Act**”) by disallowing input tax credits (“**ITCs**”) claimed by it for the Relevant Periods in the total amount of \$15,695,124 (the “**Denied ITCs**”) and assessing penalties under section 285 of the Act (and related interest).
2. The Assessments were made under the following reference numbers and 999 Gold is disputing the following amounts:

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2013/04/01 to 2013/04/30	13121000332360226	Net Tax: \$1,276.19 S. 285 Penalty: \$319.04 Arrears Interest: \$1,065.38
2013/05/01 to 2013/05/31	13155000232360183	Net Tax: \$3,5663.89 S. 285 Penalty: \$8,915.97 Arrears Interest: \$29,046.76 Refund Interest: \$31.77
2013/06/01 to 2013/06/30	13183000332360314	Net Tax: \$59,299.78 S. 285 Penalty: \$14,824.94 Arrears Interest: \$47,812.98 Refund Interest: \$54.85
2013/07/01 to 2013/07/31	13213000232360812	Net Tax: \$61,988.71 S. 285 Penalty: \$15,497.17 Arrears Interest: \$49,137.74 Refund Interest: \$127.48
2013/08/01 to 2013/08/31	13247000132360840	Net Tax: \$64,516.92 S. 285 Penalty: \$16,129.23 Arrears Interest: \$51,088.61 Refund Interest: \$48.62

2013/09/01 to 2013/09/30	13274000232360811	Net Tax: \$84,696.68 S. 285 Penalty: \$21,174.17 Arrears Interest: \$67,050.70
2013/10/01 to 2013/10/31	13305000232360325	Net Tax: \$137,932.08 S. 285 Penalty: \$34,483.02 Arrears Interest: \$107,625.32
2013/11/01 to 2013/11/30	13336000232360455	Net Tax: \$151,247.83 S. 285 Penalty: \$37,811.95 Arrears Interest: \$116,615.39
2013/12/01 to 2013/12/31	14002000232360250	Net Tax: \$170,477.41 S. 285 Penalty: \$42,619.35 Arrears Interest: \$128,207.01 Refund Interest: \$111.79
2014/01/01 to 2014/01/31	14034000132360681	Net Tax: \$134,834.14 S. 285 Penalty: \$33,708.53 Arrears Interest: \$101,529.75
2014/02/01 to 2014/02/28	14062000232360031	Net Tax: \$140,627.36 S. 285 Penalty: \$35,156.84 Arrears Interest: \$104,790.75
2014/03/01 to 2014/03/31	14091000232360828	Net Tax: \$131,372.14 S. 285 Penalty: \$32,843.03 Arrears Interest: \$96,847.80
2014/04/01 to 2014/04/30	14121000332360267	Net Tax: \$268,234.23 S. 285 Penalty: \$67,058.55 Arrears Interest: \$195,309.61
2014/05/01 to 2014/05/31	14153000332360153	Net Tax: \$312,955.77 S. 285 Penalty: \$78,238.94 Arrears Interest: \$225,469.29
2014/06/01 to 2014/06/30	14183000332360224	Net Tax: \$324,856.69 S. 285 Penalty: \$81,214.17 Arrears Interest: \$231,400.84
2014/07/01 to 2014/07/31	14213000232360606	Net Tax: \$24,852.29 S. 285 Penalty: \$6,213.07 Arrears Interest: \$17,480.10
2014/09/01 to 2014/09/30	14274000232360684	Net Tax: \$20,486.00 S. 285 Penalty: \$5,121.50 Arrears Interest: \$14,093.46

2014/11/01 to 2014/11/30	14335000332360060	Net Tax: \$11,154.94 S. 285 Penalty: \$2,788.73 Arrears Interest: \$7,494.22
2014/12/01 to 2014/12/31	15005000332360305	Net Tax: \$42,644.68 S. 285 Penalty: \$10,661.17 Arrears Interest: \$27,799.05 Refund Interest: \$38.79
2015/01/01 to 2015/01/31	15034000332360052	Net Tax: \$101,027.04 S. 285 Penalty: \$25,256.76 Arrears Interest: \$65,735.85
2015/02/01 to 2015/02/28	15061000332360077	Net Tax: \$95,397.75 S. 285 Penalty: \$23,849.43 Arrears Interest: \$61,824.92
2015/03/01 to 2015/03/31	15091000332360259	Net Tax: \$138,469.71 S. 285 Penalty: \$34,617.42 Arrears Interest: \$88,517.50
2015/04/01 to 2015/04/30	15121000332360249	Net Tax: \$140,799.86 S. 285 Penalty: \$35,199.96 Arrears Interest: \$88,909.02
2015/05/01 to 2015/05/31	15152000232360537	Net Tax: \$156,969.06 S. 285 Penalty: \$39,242.26 Arrears Interest: \$98,037.04
2015/06/01 to 2015/06/30	15183000232360368	Net Tax: \$142,839.85 S. 285 Penalty: \$35,709.96 Arrears Interest: \$86,641.46 Refund Interest: \$117.44
2015/07/01 to 2015/07/31	15217000232360122	Net Tax: \$33,572.67 S. 285 Penalty: \$8,393.16 Arrears Interest: \$20,177.67 Refund Interest: \$12.65
2015/09/01 to 2015/09/30	15274000232360700	Net Tax: \$184,476.60 S. 285 Penalty: \$46,119.15 Arrears Interest: \$109,365.15
2015/10/01 to 2015/10/31	15306000632360449	Net Tax: \$205,375.46 S. 285 Penalty: \$51,343.86 Arrears Interest: \$120,202.80

2015/11/01 to 2015/11/30	15335000232360938	Net Tax: \$155,363.18 S. 285 Penalty: \$38,840.79 Arrears Interest: \$89,816.64
2015/12/01 to 2015/12/31	16004000332360532	Net Tax: \$123,603.14 S. 285 Penalty: \$30,900.78 Arrears Interest: \$70,425.85
2016/01/01 to 2016/01/31	16032000432360066	Net Tax: \$161,683.12 S. 285 Penalty: \$40,420.78 Arrears Interest: \$90,991.62
2016/02/01 to 2016/02/29	16061000232360478	Net Tax: \$166,071.24 S. 285 Penalty: \$41,517.81 Arrears Interest: \$92,254.55
2016/03/01 to 2016/03/31	16092000332360007	Net Tax: \$221,112.58 S. 285 Penalty: \$55,278.14 Arrears Interest: \$121,067.57
2016/04/01 to 2016/04/30	16123000732360607	Net Tax: \$168,158.79 S. 285 Penalty: \$42,039.69 Arrears Interest: \$90,796.04
2016/05/01 to 2016/05/31	16153000232360776	Net Tax: \$299,548.24 S. 285 Penalty: \$74,887.06 Arrears Interest: \$159,487.62
2016/06/01 to 2016/06/30	16186000232360705	Net Tax: \$250,816.73 S. 285 Penalty: \$62,704.18 Arrears Interest: \$131,652.47
2016/07/01 to 2016/07/31	16215000432360221	Net Tax: \$262,760.90 S. 285 Penalty: \$65,690.22 Arrears Interest: \$136,052.72
2016/08/01 to 2016/08/31	16245000232360218	Net Tax: \$367,804.42 S. 285 Penalty: \$91,951.10 Arrears Interest: \$187,570.80
2016/09/01 to 2016/09/30	16277000232360545	Net Tax: \$388,203.74 S. 285 Penalty: \$97,050.93 Arrears Interest: \$195,161.20
2016/10/01 to 2016/10/31	16306000232360826	Net Tax: \$278,166.78 S. 285 Penalty: \$69,541.69 Arrears Interest: \$137,795.45

2016/11/01 to 2016/11/30	16340000132360866	Net Tax: \$315,015.04 S. 285 Penalty: \$78,753.76 Arrears Interest: \$152,379.64 Refund Interest: \$19.06
2016/12/01 to 2016/12/31	17003000132360915	Net Tax: \$238,654.10 S. 285 Penalty: \$59,663.52 Arrears Interest: \$114,842.17
2017/01/01 to 2017/01/31	17032000332360778	Net Tax: \$447,806.51 S. 285 Penalty: \$111,951.62 Arrears Interest: \$210,913.57
2017/02/01 to 2017/02/28	17060000332360119	Net Tax: \$375,140.12 S. 285 Penalty: \$93,785.03 Arrears Interest: \$174,093.52
2017/03/01 to 2017/03/31	17093000332360128	Net Tax: \$392,167.07 S. 285 Penalty: \$98,041.76 Arrears Interest: \$178,910.83
2017/04/01 to 2017/04/30	17121000632360956	Net Tax: \$158,210.25 S. 285 Penalty: \$39,552.56 Arrears Interest: \$71,725.78
2017/05/01 to 2017/05/31	17152000232360655	Net Tax: \$229,043.91 S. 285 Penalty: \$57,260.97 Arrears Interest: \$102,110.99
2017/06/01 to 2017/06/30	17185000232360770	Net Tax: \$175,262.54 S. 285 Penalty: \$43,815.63 Arrears Interest: \$76,875.19
2017/07/01 to 2017/07/31	17213000232360793	Net Tax: \$155,306.78 S. 285 Penalty: \$38,826.69 Arrears Interest: \$67,068.02
2017/08/01 to 2017/08/31	17244000132360807	Net Tax: \$331,940.16 S. 285 Penalty: \$82,985.04 Arrears Interest: \$140,873.53
2017/09/01 to 2017/09/30	17275000332360724	Net Tax: \$85,659.71 S. 285 Penalty: \$21,414.92 Arrears Interest: \$35,777.05
2017/10/01 to 2017/10/31	17305000232360779	Net Tax: \$101,314.99 S. 285 Penalty: \$25,328.74 Arrears Interest: \$41,641.29

2017/11/01 to 2017/11/30	17335000232360170	Net Tax: \$160,887.89 S. 285 Penalty: \$40,221.97 Arrears Interest: \$64,964.73
2017/12/01 to 2017/12/31	18005000232360336	Net Tax: \$199,493.50 S. 285 Penalty: \$49,873.37 Arrears Interest: \$79,011.23
2018/01/01 to 2018/01/31	18032000332360356	Net Tax: \$327,125.08 S. 285 Penalty: \$81,781.27 Arrears Interest: \$127,558.46
2018/02/01 to 2018/02/28	18060000232360969	Net Tax: \$302,522.81 S. 285 Penalty: \$75,630.70 Arrears Interest: \$116,025.45
2018/03/01 to 2018/03/31	18092000332360666	Net Tax: \$302,261.12 S. 285 Penalty: \$75,565.28 Arrears Interest: \$113,621.42 Refund Interest: \$3.11
2018/04/01 to 2018/04/30	18121000432360389	Net Tax: \$298,743.31 S. 285 Penalty: \$74,685.82 Arrears Interest: \$110,035.85
2018/05/01 to 2018/05/31	18152000332360357	Net Tax: \$427,919.22 S. 285 Penalty: \$106,979.80 Arrears Interest: \$151,924.31 Refund Interest: 79.00
2018/06/01 to 2018/06/30	18184000332360017	Net Tax: \$428,478.23 S. 285 Penalty: \$107,119.55 Arrears Interest: \$150,632.20
2018/07/01 to 2018/07/31	18213000332360404	Net Tax: \$487,975.78 S. 285 Penalty: \$121,993.94 Arrears Interest: \$167,474.29
2018/08/01 to 2018/08/31	18247000232360161	Net Tax: \$347,548.63 S. 285 Penalty: \$86,887.15 Arrears Interest: \$116,555.70
2018/09/01 to 2018/09/30	18274000232360908	Net Tax: \$307,121.07 S. 285 Penalty: \$76,780.26 Arrears Interest: \$100,714.26

2018/10/01 to 2018/10/31	18305000232360479	Net Tax: \$408,456.18 S. 285 Penalty: \$102,114.04 Arrears Interest: \$130,521.65
2018/11/01 to 2018/11/30	18337000232360639	Net Tax: \$344,170.71 S. 285 Penalty: \$86,042.67 Arrears Interest: \$107,375.24
2018/12/01 to 2018/12/31	19002000432360074	Net Tax: \$452,526.82 S. 285 Penalty: \$113,131.70 Arrears Interest: \$137,680.46
2019/01/01 to 2019/01/31	19032000332360338	Net Tax: \$181,521.62 S. 285 Penalty: \$45,380.40 Arrears Interest: \$53,784.40
2019/02/01 to 2019/02/28	19060000332360013	Net Tax: \$199,410.02 S. 285 Penalty: \$49,852.50 Arrears Interest: \$57,638.61
2019/03/01 to 2019/03/31	19091000732360115	Net Tax: \$206,586.55 S. 285 Penalty: \$51,646.63 Arrears Interest: \$58,190.61
2019/04/01 to 2019/04/30	19121000532360008	Net Tax: \$319,026.27 S. 285 Penalty: \$79,756.56 Arrears Interest: \$87,442.69
2019/05/01 to 2019/05/31	19154000232360909	Net Tax: \$357,891.45 S. 285 Penalty: \$89,472.86 Arrears Interest: \$8,221.47
2019/06/01 to 2019/06/30	19183000532360685	Net Tax: \$274,859.33 S. 285 Penalty: \$68,714.83 Arrears Interest: \$0.00
2019/07/01 to 2019/07/31	19213000332360780	Net Tax: \$93,183.36 S. 285 Penalty: \$23,295.84 Arrears Interest: \$0.00
2019/08/01 to 2019/08/31	19246000432360171	Net Tax: \$40,555.92 S. 285 Penalty: \$10,138.98 Arrears Interest: \$0.00

## II. FACTS

### *Background*

3. 999 Gold is a company established under the Ontario *Business Corporations Act* dealing in precious metals, with its head office located in downtown Toronto, for over 24 years.
4. 999 Gold is a family-owned and operated business which currently employs 5 people, including principals.
5. The core of 999 Gold's business is the purchase of scrap precious metals, the refinement of the scrap precious metals, and the sale of the refined precious metals.
6. 999 Gold usually buys scrap gold, scrap silver, scrap platinum, scrap palladium, dental scrap, grindings, filings, polishing dust and sweeps and then sends these scrap precious metals to various external counterparties in Canada and in the United States to be refined.
7. Once the precious metal is refined to bullion form, 999 Gold sells the bullion to its customers who are primarily investors and jewellers.
8. To carry on its business, 999 Gold maintains a 780 square foot facility, which comprises a dedicated customer area, with 2 customer booths as well as a melt room with 2 induction furnaces, 2 x-ray assay machines, 4 scales, 2 class 3 safes, and multiple desks and computers.
9. Though 999 Gold buys and sells various precious metals, as explained above, this objection is focused on the purchase, refinement and sale of gold by 999 Gold because this was the focus of the Canada Revenue Agency ("CRA") during its audit and the Assessments involved only gold transactions.
10. When buying scrap gold, 999 Gold generally pays its suppliers 98% of the value of the gold in the scrap it purchases. In addition to the very slim margin that it keeps on the purchase, 999 Gold can also profit from any positive variation of the value of the gold from the moment that it received the scrap gold and when it sells the pure gold on the market.
11. 999 Gold generally does not pay its suppliers any amounts for any metals other than gold in the scrap. Alternatively, 999 Gold may agree to pay anywhere from 85% to 99% of the

value of all the precious metals in the scrap (gold, palladium, platinum, silver, etc.), but this is generally only done when there are significant quantities of metals other than gold in the scrap.

12. During the Reporting Periods, 999 Gold conducted its business with approximately 439 different suppliers of gold, consisting primarily of jewellers, jewelry manufacturers, and wholesalers.
13. Each of those suppliers attended the 999 Gold's facility (or in some cases utilized delivery services to supply 999 Gold with unrefined gold which 999 Gold refined. As described in additional detail below, this provision of unrefined gold to 999 Gold for refining constituted a supply by way of sale of the unrefined gold by the customer to 999 Gold for GST/HST purposes.
14. For each of those purchases, 999 Gold (through multiple employees) performed the following functions:
  - (A) identified and validated the identity of the supplier (including the corporation and the individual, where applicable) at the opening of the supplier account. As set out in more detail below, this included obtaining the articles of incorporation for any corporation, identifying the directors of the corporation, and obtaining a copy of the individual's identification in order to confirm they were, in fact, dealing with a director or officer of the company;
  - (B) confirmed the identity of the person again at each supplier attendance and entry to the 999 Gold's premises by confirming the person was who they said they were;
  - (C) weighed and inspected the unrefined gold upon receipt in the melt room;
  - (D) melted/re-melted gold in the presence of the supplier, where applicable;
  - (E) performed multiple assays to determine the purity of the gold;
  - (F) secured the gold after melting;
  - (G) settled pricing with the supplier, based on posted market prices;

- (H) provided an assay and settlement report to the supplier;
  - (I) settled the transaction either with pure gold, payment in money (*e.g.*, draft, wire, cheque, cash), or through holding an equivalent quantity of pure gold on account for the supplier;
  - (J) consolidated melted bars into lots to be delivered to the third-party refiner for further refining; and
  - (K) settled with the third-party, final refiner by applying the value of the gold to 999 Gold's pool account that it maintains with the refiner and subsequently:
    - i. taking back the refined gold in the form of investment-grade, gold bars; and/or
    - ii. selling the refined gold to the final refiner and receiving a wire payment as consideration for the transaction.
15. Over the years, and during the Relevant Periods, 999 Gold dealt with well-established third-party refiners in Canada and the United States to refine the scrap gold, including Metalor, Valcambi and Asahi (the "**Refiners**").
16. 999 Gold's suppliers charged GST/HST to 999 Gold, as applicable, and such GST/HST was paid by 999 Gold and claimed by 999 Gold as ITCs.
17. All amounts paid by 999 Gold in respect of GST/HST charged by the various suppliers were paid by 999 Gold to the suppliers as and on account of GST/HST and were taken into account as GST/HST.
18. For each purchase and sale, supporting documentation, including invoices, was prepared in the normal course of business and reported in the 999 Gold's books and records to reflect the actual transactions that took place between 999 Gold and each of its suppliers.
19. 999 Gold exercised diligence and took extensive precautions at each step of its dealings with its suppliers. In particular:

- (A) before onboarding suppliers, on opening a new supplier account, 999 Gold followed meticulous processes to document and confirm the identity of its suppliers and, where applicable, verify their GST/HST registration by asking for a copy of:
- i. the supplier's articles (or certificate) of incorporation;
  - ii. proof of identification (“**ID**”) of the director Acting on behalf of the corporation;
  - iii. Confirming the individual they were dealing with was a director or officer of the corporation and could validly act for the corporation, and
  - iv. Confirmation of valid GST registration number on the CRA's GST registry.
- (B) 999 Gold maintained its supplier records and confirmed the validity of the supplier's GST/HST registration on approximately a monthly basis.
20. While its sales volume has been high, due in part to the high value of gold, 999 Gold's gross profit margin on gold transactions is low (*i.e.*, typically 1-2%) which is consistent with market rates. This margin is what 999 Gold historically considered its “fee” for refining gold. Specifically:
- (A) 999 Gold purchased its unrefined gold based on the volume of gold content times the market rate, less a 1-2% discount;
  - (B) in turn, 999 Gold sold the refined product (*i.e.*, pure gold) at the market price; and
  - (C) from that gross margin 999 Gold had to pay third-party refining fees, operating expenses and income tax.
21. 999 Gold is, and was at all material times, registered for the GST/HST pursuant to Part IX of the Act. Its GST/HST returns are filed on a monthly basis.
22. 999 Gold's GST/HST returns typically included large amounts of ITCs (consisting of the GST/HST paid or payable by 999 Gold to its suppliers) and a comparatively small amount of GST/HST collected (as it sells primarily zero-rated precious metals, namely, pure gold) resulting in net tax refunds claimed by 999 Gold pursuant to paragraph 228(3)(b) of the Act.

***CRA Audit***

23. The CRA initially proposed to reassess 999 Gold in its letter dated May 27, 2022 (the “**Proposal Letter**”).
24. Based on our understanding of the Proposal Letter, the CRA proposed to disallow the Denied ITCs because the CRA concluded that 999 Gold was a “willing participant in a scrap gold carousel scheme”, that 999 Gold was involved in a scheme that involved “the use of accommodation invoices” and “sham documents” and that “audit has found that the purchase invoices submitted to audit are false documents that misrepresent the rights and obligations of 999 and its purported suppliers”.
25. The Proposal Letter proposed to disallow ITCs claimed by 999 Gold with regards to transactions entered with multiple suppliers that the CRA considered were involved in a carousel scheme over the Relevant Periods (the “**Relevant Suppliers**”).
26. In a letter dated June 16, 2022, 999 Gold’s representatives, Osler Hoskin & Harcourt LLP (“**Osler**”), asked the CRA to provide the facts upon which the Proposal Letter was issued.
27. In a letter dated July 7, 2022, the CRA replied to Osler, but refused to provide such facts. In that letter, the CRA confirmed that 999 Gold, in fact, bought scrap gold from the Relevant Suppliers and that the scrap gold was, in fact, sent by 999 Gold to be refined by a third-party.

***CRA Reassessments***

28. The CRA then issued the Assessments to 999 Gold Depot denying the ITCs and assessing penalties (and related interest).
29. We understand that the basis for the Assessments, based on the Final Audit Letter is as follows:
  - (A) The gold purchased by 999 Gold from the suppliers which the CRA alleges were part of a carousel scheme was not purchased in the course of 999 Gold’s commercial activities.

- (B) The CRA also alleged that 999 Gold was part of a “scheme” which the CRA alleged involved the use of accommodation invoices, sham documents, and transactions in debased pure gold.

### III. ISSUES

30. The issues in dispute are:

- i. whether 999 Gold is Entitled to the Denied ITCs;
- ii. in the alternative, if the Minister was correct to conclude that the Denied ITCs were not payable for taxable supplies, which is denied by 999 Gold, whether, in issuing the Assessments, the Minister failed to apply an allowable rebate equal to the Denied ITCs;
- iii. whether the Minister was permitted to reassess 999 Gold beyond the normal reassessment period; and
- iv. whether 999 Gold is liable for gross negligence penalties applied under section 285 of the Act.

### IV. REASONS FOR OBJECTION

31. 999 Gold relies, *inter alia*, on subsection 123(1) and sections 165, 169, 221, 224, 225, 228, 229, 242, 261, 285, 296 and 298, section 3 of Part IX of Schedule VI of the Act, all relevant provisions in the *Input Tax Credit Information (GST/HST) Regulations* (the "**ITC Regulations**") and any relevant regulations under the Act.

**(i) 999 Gold is Entitled to the Denied ITCs**

32. Pursuant to section 169 of the Act, 999 Gold is entitled to the Denied ITCs if:

- (A) 999 Gold acquired the unrefined gold during a reporting period when it was a registrant;
- (B) GST/HST in respect of the supply of unrefined gold became payable by 999 Gold or was paid by 999 Gold without having become payable;

- (C) 999 Gold acquired the unrefined gold for consumption, use or supply in the course of its commercial activities; and
  - (D) 999 Gold obtained sufficient evidence in such form containing information to enable the amount of the ITCs to be determined, including the documentary requirements to claim ITCs in subsection 169(4) of the Act and the ITC Regulations (the “**ITC Requirement(s)**”)
33. 999 Gold has met all four of the ITC Requirements for validly claiming the Denied ITCs
  34. With respect to the first ITC Requirement, 999 Gold acquired the unrefined gold and claimed the Denied ITCs during a reporting period during which it was a registrant. Each of the Relevant Suppliers attended the 999 Gold’s premises (or had gold delivered to the 999 Gold’s premises) and sold 999 Gold unrefined gold, for which the Denied ITCs were claimed, as indicated above. The Relevant Suppliers were “suppliers” as defined in the Act for purposes of these supplies by way of sale.
  35. 999 Gold has clear evidence that it acquired the unrefined gold from the third party suppliers, and has receipts from the third party refiners to demonstrate that gold was actually purchased and refined.
  36. The fact that gold was acquired and refined by 999 Gold was not disputed by the CRA.
  37. With respect to the second ITC Requirement, GST/HST in respect of the supply of the unrefined gold became payable by 999 Gold, as each sale of unrefined gold by each of the Relevant Suppliers to 999 Gold constituted a non-zero-rated, GST/HST taxable supply, and was thus subject to 13% GST/HST pursuant to section 165 of the Act.
  38. The Relevant Suppliers charged 999 Gold GST/HST representing 13% of the price of the unrefined gold. The GST/HST was also paid to these suppliers, none of whom was related to 999 Gold.
  39. Further, and in the alternative, to the extent that GST/HST did not become payable for some reason (which is strictly denied), 999 Gold clearly paid GST/HST on the relevant transactions, thus meeting the second ITC Requirement.

40. With respect to the third ITC Requirement, 999 Gold acquired the unrefined gold for supply in the course of its commercial activities, namely, in making its taxable supply of precious metals, which were zero-rated financial services pursuant to section 3 of Part IX of Schedule VI of the Act, and thus subject to GST/HST at a 0% rate pursuant to subsection 165(3) of the Act.
41. The meaning of “commercial Activities” is defined in subsection 123(1) of the Act as follows:
- commercial activity of a person means
- (a) a business carried on by the person (other than a business carried on without a reasonable expectation of profit by an individual, a personal trust or a partnership, all of the members of which are individuals), except to the extent to which the business involves the making of exempt supplies by the person,
- (b) an adventure or concern of the person in the nature of trade (other than an adventure or concern engaged in without a reasonable expectation of profit by an individual, a personal trust or a partnership, all of the members of which are individuals), except to the extent to which the adventure or concern involves the making of exempt supplies by the person, and
- ...
42. The definition of “commercial activities” is very broad and includes any business or adventure or concern of the person in the nature of trade carried on by the person, except to the extent to which the business involves the making of exempt supplies.
43. As such, any business activities that are not exempt supplies, fall in the “commercial activities” definition of the Act. While not relevant to 999 Gold’s facts, as it was not involved in any “scheme”, we note that the courts have gone as far as to consider that even illegal activities such as dealing drugs, are considered “commercial activities” under the Act.<sup>1</sup>
44. Thus, it is clear that the unrefined gold purchased by 999 Gold in the course of its refining business was clearly made in the “course of a commercial activity”.

---

<sup>1</sup> See for example: *Molenaar v. R.*, 2003 TCC 468, *Ouellet v. R.*, 2009 TCC 443 and *Boisvert v. R.*, 2016 TCC 195.

45. On one hand, the CRA takes the position that 999 Gold bought “debased pure gold” while on the other it concludes, without providing any reasons or evidence, that there were accommodation invoices and sham documents.
46. These theories are both baseless and contradictory; 999 Gold cannot, at the same time, buy what the auditor refers to as debased pure gold (*i.e.* pure gold that was transformed to a form that is less than 99.5% pure) while at the same time preparing accommodation invoices or sham documents which require that 999 Gold would not have bought the scrap gold (whether it was debased, or not) from the Relevant Suppliers.
47. In any event, the CRA clearly agrees that 999 Gold, did, as a matter of fact, acquire gold that was not 99.5% pure from the Relevant Suppliers and that this same gold was then sent to the Refiners to be refined to a pure form.
48. As such, there is no debate on this point and it is clear that 999 Gold did in fact acquire the gold from the Relevant Suppliers in order to refine it and sell it, which is clearly for use in its commercial activities.
49. With respect to the last ITC Requirement, as required by subsection 169(4) of the Act, 999 Gold obtained sufficient evidence in such form containing such information to enable the amount of the ITCs to be determined, including information prescribed by the ITC Regulations. This evidence was in the form of supporting documentation, including invoices, prepared in the ordinary course of business.
50. 999 Gold even went above and beyond these requirements and asked for more documentation than what was required by law by asking for a copy of the ID of the director acting on behalf of the corporation and a copy of the articles of incorporation. This made it clear that the person they were dealing with was clearly acting for the actual supplier listed on the invoice. 999 Gold also verified that each of the suppliers was registered for GST/HST by the CRA on the CRA’s GST registry. As such, there is no question that the Relevant Suppliers were the ones supplying the unrefined gold. Nor is there any question that the CRA had registered each of the Relevant Suppliers for GST, and that the GST registration was in effect at the time when the ITCs were claimed.

***999 Gold Was Not Part of a Carousel Scheme***

51. There was nothing nefarious about the 999 Gold's business, its purchases of unrefined gold, its sale or payment of pure gold, or the gold recycling industry more generally.
52. The CRA has refused to provide any evidence to 999 Gold that any of the Relevant Suppliers did not actually remit the taxes collected. As such there is no evidence as to whether the CRA has collected tax from the Relevant Suppliers, or whether it has assessed the Relevant Suppliers for the same tax that they are denying ITCs to 999 Gold.
53. In the present case, the CRA did not provide any evidence of 999 Gold's participation in any "carousel scheme" or that 999 Gold "knowingly distributed the GST/HST refunds and refined metals to participants in the scheme" as suggested by the CRA.
54. On the contrary, 999 Gold did, in fact, enter into genuine transactions where it bought scrap gold for refining and did in fact refine all of the scrap gold which it purchased. There is also no evidence, or suggestion that 999 Gold made any money from the alleged scheme other than its small profit on the sale of the scrap gold it purchased and refined in the normal course of carrying on its business. There is also no evidence that payments flowed in a circular fashion, which is the whole basis of a "carousel scheme".
55. 999 Gold was the recipient of the taxable supplies of scrap gold from the Relevant Suppliers, who were GST registered suppliers, and thus 999 Gold was responsible for paying GST/HST to them.
56. 999 Gold did not "work in collusion to deceive the Minister", nor did it obtain any benefit from any such scheme. It merely purchased taxable scrap metal in the normal course of its business from GST registered suppliers to whom it paid amounts for the metal and paid the applicable taxes.
57. At all times, 999 Gold purchased unrefined gold and paid GST/HST in good faith as part of its refining business. All of the relevant transactions were real, commercial transactions, were properly documented and met the statutory requirements to claim ITCs.
58. As such, contrary to the CRA's position, it is clear that 999 Gold did not participate in any carousel scheme.

***999 Gold Cannot be Held Liable if the Suppliers did not Remit the GST/HST Amounts it Paid***

59. Under the Act, suppliers are generally responsible for collecting GST/HST, as agent of the Crown pursuant to subsection 221(1) of the Act.
60. GST registered suppliers are responsible for collecting and remitting the GST/HST on their taxable supplies less any ITCs to which they are entitled under subsection 169(1) of the Act, if various conditions are met.
61. If a GST registered supplier makes a taxable supply and does not remit the applicable GST/HST on the supply, the CRA can, and usually will, assess the supplier for failing to remit such tax (though we have no knowledge if the CRA has done so in this case).
62. From the recipient's perspective, if a GST registered supplier supplies a taxable good (such as scrap gold) the recipient is required to pay the supplier the applicable GST/HST, and is entitled to an ITC regardless of whether the supplier remits the GST/HST to the CRA.
63. There are no provisions in the Act which would allow the recipient of the supply to choose not to pay GST/HST on a taxable supply of tangible property to a GST registered supplier, and in fact, the supplier can sue the recipient for the tax that was collectible "as though it were a debt due by the recipient to the supplier" under section 224 of the Act if it is not paid. As such, 999 Gold was required to pay the GST/HST to the Relevant Suppliers all of whom were registered for GST.
64. Whether there are shortcomings elsewhere in the supply chain because certain suppliers are not remitting the GST/HST to the CRA (for instance due to bankruptcy), or even some sinister activity on the part of some supplier (which 999 Gold has no knowledge of), such circumstances would be of no relevance to 999 Gold's entitlement to the Denied ITCs.
65. Most of the Relevant Suppliers for which the CRA refused the ITCs are still validly incorporated and we understand still operate their businesses.
66. Moreover, many of those suppliers still had valid GST registration numbers as of August 1st, 2022, a few weeks after the CRA's Proposal Letter. If some suppliers had not been remitting GST/HST they have collected to the CRA, and as the CRA has alleged, these companies were actively part of a fraud scheme, the CRA has an obligation to cancel these

registrations immediately so that unsuspecting taxpayers do not continue to pay GST/HST to companies which remain registered agents of the Crown. Deregistration is the only way that taxpayers can see that they should not be paying GST/HST to suppliers which they would otherwise be required to pay by law so as long as the supplier is registered for GST/HST. This was not done.

67. Further, if the CRA's position was correct that they can assess parties for paying GST/HST to GST registered vendors if the GST registered vendors do not remit GST/HST to the CRA, even where they are required by law to do so, this will cause a breakdown in the entire GST/HST system, as no recipients will want to pay GST/HST to suppliers if they are not certain they can claim an ITC for these amounts.
68. It is not appropriate for the CRA to assess 999 Gold for GST/HST which it correctly paid to a GST registered company (that is acting as agent for the Crown) as required by the Act. This is especially the case if the CRA is aware that some of its GST registered agents are fraudulently not remitting the GST/HST they have collected, and not only refuses to provide the information to taxpayers as to who the bad actors are, but has also not even taken the simple step of cancelling these registrations so that taxpayers like 999 Gold can become aware that they should not continue to pay GST/HST to these parties.

***999 Gold was Diligent and Stopped Dealing with Suppliers***

69. Even if the CRA did not provide any proof or indicia of wrongdoing on any of the Relevant Supplier's part, once 999 Gold was made aware by the CRA that certain suppliers might not be remitting GST/HST collected to the CRA, 999 Gold stopped, if it was not a buying taxable supplies from the Relevant Suppliers.
70. Contrary to the CRA's position, the decision of 999 Gold to stop dealing with these suppliers does not prove that it was part of a "carousel scheme" or any other type of scheme to defraud the government. On the contrary, 999 Gold's decision to not deal with suppliers who the CRA had suggested might not be complying with their tax obligations, even where it cost 999 Gold's business to do so, shows that it is a good taxpayer that will go out of its way to insure that it is not party to any fraudulent scheme and will not deal with other GST registrants who might be.

71. If the CRA's position was correct, it would lead to the conclusion that an honest taxpayer should have continued to do business with parties that the CRA alleged were involved in a fraud in order to demonstrate that it was not part of the scheme. This makes absolutely no sense.

***(ii) In the alternative, if the Minister was correct to conclude that the Denied ITCs were not payable for commercial activities, which is denied by 999 Gold, whether, in issuing the Assessments, the Minister failed to apply an allowable rebate equal to the Denied ITC***

72. As explained in more detail above, the Denied ITCs were correctly paid to GST registrants and should be allowed.

73. In the alternative, should it be concluded that the Denied ITCs were not payable for "commercial activities" as proposed by the CRA, which is denied by 999 Gold, then 999 Gold should not have paid the Denied ITCs and should be entitled to a corresponding rebate pursuant to section 261 of the Act if claimed in a rebate application made on the date specified in subparagraph 296(2.1)(a)(i) of the Act.

74. In assessing 999 Gold's net tax for the Reporting Periods, the Minister was required to credit an amount equal to the Denied ITCs as an "allowable rebate" pursuant to subsection 296(2.1) of the Act, thus resulting in no increase to the 999 Gold's net tax.

***(iii) The Minister was Not Permitted to Reassess 999 Gold Beyond the Normal Reassessment Period***

75. The Minister is generally required to reassess a taxpayer within the four-year limitation period set out in subsection 298(1) of the Act.

76. Subsection 298(4) of the Act provides that an assessment can be made at any time if the taxpayer made a misrepresentation in filing its returns which is attributable to the person's neglect, carelessness or wilful default.

77. The burden is on the Minister to prove that 999 Gold made a misrepresentation which is attributable to its neglect, carelessness or wilful default, which it has not done in the present circumstances.

78. Even under the Minister's theory, 999 Gold made taxable purchases of gold which was less than 99.5% pure, refined the gold, and sold the refined gold. This was correct, not a misrepresentation at all, and was not related to any neglect, carelessness or wilful default.
79. As such, any periods that are beyond the four-year limitation period should not be reassessed unless the Minister provides clear evidence of 999 Gold having made a misrepresentation which is attributable to its neglect, carelessness or wilful default. This has not been done.

***(iv) 999 Gold is Not Liable for Gross Negligence Penalties***

80. Section 285 of the Act provides that "every person who knowingly, or under circumstances amounting to gross negligence, makes or participates in, assents to or acquiesces in making of a false statement or omission in a return ... made in respect of a reporting period or transaction is liable to a penalty ... if the false statement or omission is relevant to the determination of net tax of the person for a reporting period."
81. The burden of proof is on the Minister to justify the assessment of penalties.
82. As there is no basis for the GST/HST adjustments increasing net tax, penalties under section 285 of the Act cannot apply.
83. Further, and in the alternative, the Minister has not provided any evidence to show that 999 Gold has knowingly, or under circumstances amounting to gross negligence, made or participated in or acquiesced in the making of a false statement or omission in a return or any other document.
84. It appears from the audit that the CRA has suggested that some of 999 Gold's suppliers may not have remitted the GST/HST paid to them by 999 Gold to the CRA (although even this is not entirely clear). Assuming this is the case, this are still no grounds for denying ITCs to 999 Gold who paid the GST/HST in good faith.
85. While the Minister has the burden of proving gross negligence, the CRA has not shown any factual evidence that demonstrates that 999 Gold was involved in any scheme, much less that it was grossly negligent. Rather, the CRA's case appears to be entirely based on unsupported statements and assumptions, without any evidence, that 999 Gold was

somehow involved in some sort of fraudulent scheme with the GST registered suppliers who sold it scrap gold.

86. This is clearly not correct. As explained in detail above, 999 Gold was very diligent and even asked more documents from the Relevant Suppliers than what it is required to under the Act and the ITC Regulations.
87. Accordingly, the penalties applied under section 285 of the Act do not apply and must be vacated accordingly.

**V. RELIEF SOUGHT**

88. 999 Gold respectfully requests that the CRA reassess the Relevant Periods in accordance with its position as set out above. In particular, 999 Gold specifically request that the CRA reassess to:
  - (A) reverse the disallowance of the Denied ITCs in the amount of \$15,695,124;
  - (B) reverse the assessment of penalties under section 285 of the Act in the amount of \$3,923,781; and
  - (C) reverse the application of any related penalties.
89. In addition to the specific relief requested above, 999 Gold seeks all other correlative adjustments consequential to the foregoing, including the payment of interest under the Act, and such further and other relief that may reasonably relate thereto

# **APPENDIX A**

Sudbury ON P3A 5C1

999 GOLD DEPOT (CANADA) LIMITED
901-27 QUEEN ST E
TORONTO ON M5C 2M6

Table with 3 rows: Date (March 2, 2023), Business Number (88745 5749 RT0001), Period Covered (Refer to Summary)

0003924

NOTICE OF (RE)ASSESSMENT
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)

RESULTS

This notice explains the results of our audit (re)assessment of return(s) you have or may have previously filed. Please refer to the "Summary of (Re)Assessment" for the specific period(s) covered.

Table with 2 columns: Description and Amount. Rows include Result of this (Re)Assessment, Prior Balance, and Total Balance.

Payments will not appear on this notice of assessment if we have not processed your payment yet. If you have already paid the balance owing, please ignore this message and accept our thanks.

To see the latest account information, including payment transactions, go to canada.ca/my-cra-business-account on the CRA's website.

We may take legal action to collect debts that are not paid voluntarily.

Need to make a payment? Pre-authorized debit is now available for businesses. At your convenience, a pre-authorized debit agreement can be set up using the CRA's My Business Account service.

Please keep this Notice of (Re)Assessment for your records.

For more information, phone or write to:

Greater Toronto Area West TSO
5800 Hurontario Street
Mississauga
Toll free number

ON L5R 4B4
1-800-959-8281 (Canada and United States)

Bob Hamilton
Commissioner of Revenue



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/04/01 To: 2013/04/30

**Reference Number: 13121000332360226**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 127,683.77 Cr	\$	126,407.58 Cr	\$	1,276.19
Section 285 Penalty	\$ 0.00	\$	319.04	\$	319.04
					=====
			<b>Net Adjustment</b>	\$	<b>1,595.23</b>
Interest and Penalty				\$	1,065.38
Arrears Interest				\$	1,065.38
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>2,660.61</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003925

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/05/01 To: 2013/05/31

Reference Number: 13155000232360183

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 156,724.11 Cr	\$ 121,060.22 Cr	\$ 35,663.89
Section 285 Penalty	\$ 0.00	\$ 8,915.97	\$ 8,915.97
		<b>Net Adjustment</b>	<b>\$ 44,579.86</b>
Interest and Penalty			\$ 31.77
Refund Interest			\$ 29,046.76
Arrears Interest			
		<b>Result of (Re)Assessment</b>	<b>\$ 73,658.39</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/06/01 To: 2013/06/30

**Reference Number: 13183000332360314**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 644,756.86 Cr	\$	585,457.08 Cr	\$	59,299.78
Section 285 Penalty	\$ 0.00	\$	14,824.94	\$	14,824.94
					=====
			<b>Net Adjustment</b>	\$	<b>74,124.72</b>
Interest and Penalty				\$	54.85
Refund Interest				\$	47,812.98
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>121,992.55</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003926

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/07/01 To: 2013/07/31

Reference Number: 13213000232360812

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 129,620.48 Cr	\$ 67,631.77 Cr	\$ 61,988.71
Section 285 Penalty	\$ 0.00	\$ 15,497.17	\$ 15,497.17
		<b>Net Adjustment</b>	<b>\$ 77,485.88</b>
Interest and Penalty			\$ 127.48
Refund Interest			\$ 49,137.74
Arrears Interest			
		<b>Result of (Re)Assessment</b>	<b>\$ 126,751.10</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/08/01 To: 2013/08/31

**Reference Number: 13247000132360840**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 113,157.28 Cr	\$	48,640.36 Cr	\$	64,516.92
Section 285 Penalty	\$ 0.00	\$	16,129.23	\$	16,129.23
					=====
			<b>Net Adjustment</b>	\$	<b>80,646.15</b>
Interest and Penalty				\$	48.62
Refund Interest				\$	51,088.61
Arrears Interest					=====
			<b>Result of (Re)Assessment</b>	\$	<b>131,783.38</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003927

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/09/01 To: 2013/09/30

Reference Number: 13274000232360811

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 179,040.35 Cr	\$ 94,343.67 Cr	\$ 84,696.68
Section 285 Penalty	\$ 0.00	\$ 21,174.17	\$ 21,174.17
		<b>Net Adjustment</b>	<b>\$ 105,870.85</b>
Interest and Penalty			\$ 67,050.70
Arrears Interest			\$ 67,050.70
		<b>Result of (Re)Assessment</b>	<b>\$ 172,921.55</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/10/01 To: 2013/10/31

**Reference Number: 13305000232360325**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 199,648.07 Cr	\$	61,715.99 Cr	\$	137,932.08
Section 285 Penalty	\$ 0.00	\$	34,483.02	\$	34,483.02
			<b>Net Adjustment</b>	\$	<b>172,415.10</b>
Interest and Penalty				\$	107,625.32
Arrears Interest				\$	107,625.32
			<b>Result of (Re)Assessment</b>	\$	<b>280,040.42</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003928

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/11/01 To: 2013/11/30

Reference Number: 13336000232360455

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 186,156.21 Cr	\$ 34,908.38 Cr	\$ 151,247.83
Section 285 Penalty	\$ 0.00	\$ 37,811.95	\$ 37,811.95
		<b>Net Adjustment</b>	<b>\$ 189,059.78</b>
Interest and Penalty			\$ 116,615.39
Arrears Interest			\$ 116,615.39
		<b>Result of (Re)Assessment</b>	<b>\$ 305,675.17</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2013/12/01 To: 2013/12/31

**Reference Number: 14002000232360250**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 203,969.85 Cr	\$	33,492.44 Cr	\$	170,477.41
Section 285 Penalty	\$ 0.00	\$	42,619.35	\$	42,619.35
					=====
			<b>Net Adjustment</b>	\$	<b>213,096.76</b>
Interest and Penalty				\$	111.79
Refund Interest				\$	128,207.01
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>341,415.56</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003929

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/01/01 To: 2014/01/31

Reference Number: 14034000132360681

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 192,189.94 Cr	\$	57,355.80 Cr	\$	134,834.14
Section 285 Penalty	\$ 0.00	\$	33,708.53	\$	33,708.53
					=====
			<b>Net Adjustment</b>	\$	<b>168,542.67</b>
Interest and Penalty				\$	101,529.75
Arrears Interest				\$	101,529.75
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>270,072.42</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/02/01 To: 2014/02/28

**Reference Number: 14062000232360031**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 185,490.44 Cr	\$	44,863.08 Cr	\$	140,627.36
Section 285 Penalty	\$ 0.00	\$	35,156.84	\$	35,156.84
					=====
			<b>Net Adjustment</b>	\$	<b>175,784.20</b>
Interest and Penalty				\$	104,790.75
Arrears Interest				\$	104,790.75
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>280,574.95</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003930

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/03/01 To: 2014/03/31

Reference Number: 14091000232360828

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 188,533.41 Cr	\$ 57,161.27 Cr	\$ 131,372.14
Section 285 Penalty	\$ 0.00	\$ 32,843.03	\$ 32,843.03
		<b>Net Adjustment</b>	<b>\$ 164,215.17</b>
Interest and Penalty			\$ 96,847.80
Arrears Interest			\$ 261,062.97
		<b>Result of (Re)Assessment</b>	<b>\$ 261,062.97</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/04/01 To: 2014/04/30

**Reference Number: 14121000332360267**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 311,269.05 Cr	\$	43,034.82 Cr	\$	268,234.23
Section 285 Penalty	\$ 0.00	\$	67,058.55	\$	67,058.55
					=====
			<b>Net Adjustment</b>	\$	<b>335,292.78</b>
Interest and Penalty				\$	195,309.61
Arrears Interest				\$	195,309.61
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>530,602.39</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003931

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/05/01 To: 2014/05/31

Reference Number: 14153000332360153

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 336,584.66 Cr	\$ 23,628.89 Cr	\$ 312,955.77
Section 285 Penalty	\$ 0.00	\$ 78,238.94	\$ 78,238.94
		<b>Net Adjustment</b>	<b>\$ 391,194.71</b>
Interest and Penalty			\$ 225,469.29
Arrears Interest			\$ 616,664.00
		<b>Result of (Re)Assessment</b>	<b>\$ 616,664.00</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

—  
  
=



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/06/01 To: 2014/06/30

**Reference Number: 14183000332360224**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 402,165.02 Cr	\$	77,308.33 Cr	\$	324,856.69
Section 285 Penalty	\$ 0.00	\$	81,214.17	\$	81,214.17
			<b>Net Adjustment</b>	\$	<b>406,070.86</b>
Interest and Penalty				\$	231,400.84
Arrears Interest				\$	637,471.70
			<b>Result of (Re)Assessment</b>	\$	<b>637,471.70</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003932

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/07/01 To: 2014/07/31

Reference Number: 14213000232360606

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 74,550.67 Cr	\$ 49,698.38 Cr	\$ 24,852.29
Section 285 Penalty	\$ 0.00	\$ 6,213.07	\$ 6,213.07
		<b>Net Adjustment</b>	<b>\$ 31,065.36</b>
Interest and Penalty			\$ 17,480.10
Arrears Interest			\$ 17,480.10
		<b>Result of (Re)Assessment</b>	<b>\$ 48,545.46</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/09/01 To: 2014/09/30

**Reference Number: 14274000232360684**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 374,938.55 Cr	\$	354,452.55 Cr	\$	20,486.00
Section 285 Penalty	\$ 0.00	\$	5,121.50	\$	5,121.50
					=====
			<b>Net Adjustment</b>	\$	<b>25,607.50</b>
Interest and Penalty				\$	14,093.46
Arrears Interest				\$	14,093.46
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>39,700.96</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003933

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/11/01 To: 2014/11/30

Reference Number: 14335000332360060

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 58,499.68 Cr	\$ 47,344.74 Cr	\$ 11,154.94
Section 285 Penalty	\$ 0.00	\$ 2,788.73	\$ 2,788.73
		<b>Net Adjustment</b>	<b>\$ 13,943.67</b>
Interest and Penalty			\$ 7,494.22
Arrears Interest			\$ 7,494.22
		<b>Result of (Re)Assessment</b>	<b>\$ 21,437.89</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2014/12/01 To: 2014/12/31

**Reference Number: 15005000332360305**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 48,802.98 Cr	\$	6,158.30 Cr	\$	42,644.68
Section 285 Penalty	\$ 0.00	\$	10,661.17	\$	10,661.17
					=====
			<b>Net Adjustment</b>	\$	<b>53,305.85</b>
Interest and Penalty				\$	38.79
Refund Interest				\$	27,799.05
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>81,143.69</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003934

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/01/01 To: 2015/01/31

Reference Number: 15034000332360052

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 170,492.29 Cr	\$ 69,465.25 Cr	\$ 101,027.04
Section 285 Penalty	\$ 0.00	\$ 25,256.76	\$ 25,256.76
		<b>Net Adjustment</b>	<b>\$ 126,283.80</b>
Interest and Penalty			\$ 65,735.85
Arrears Interest			\$ 192,019.65
		<b>Result of (Re)Assessment</b>	<b>\$ 192,019.65</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/02/01 To: 2015/02/28

**Reference Number: 15061000332360077**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 146,830.61 Cr	\$	51,432.86 Cr	\$	95,397.75
Section 285 Penalty	\$ 0.00	\$	23,849.43	\$	23,849.43
			<b>Net Adjustment</b>	\$	<b>119,247.18</b>
Interest and Penalty				\$	61,824.92
Arrears Interest				\$	61,824.92
			<b>Result of (Re)Assessment</b>	\$	<b>181,072.10</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003935

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/03/01 To: 2015/03/31

**Reference Number: 15091000332360259**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 152,494.93 Cr	\$	14,025.22 Cr	\$	138,469.71
Section 285 Penalty	\$ 0.00	\$	34,617.42	\$	34,617.42
			<b>Net Adjustment</b>	\$	<b>173,087.13</b>
Interest and Penalty				\$	88,517.50
Arrears Interest				\$	261,604.63
			<b>Result of (Re)Assessment</b>	\$	<b>261,604.63</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
 \_\_\_\_\_  
  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/04/01 To: 2015/04/30

**Reference Number: 15121000332360249**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 172,845.21 Cr	\$	32,045.35 Cr	\$	140,799.86
Section 285 Penalty	\$ 0.00	\$	35,199.96	\$	35,199.96
					=====
			<b>Net Adjustment</b>	\$	<b>175,999.82</b>
Interest and Penalty				\$	88,909.02
Arrears Interest				\$	88,909.02
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>264,908.84</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003936

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/05/01 To: 2015/05/31

**Reference Number: 15152000232360537**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 162,393.00 Cr	\$	5,423.94 Cr	\$	156,969.06
Section 285 Penalty	\$ 0.00	\$	39,242.26	\$	39,242.26
			<b>Net Adjustment</b>	\$	<b>196,211.32</b>
Interest and Penalty				\$	98,037.04
Arrears Interest				\$	98,037.04
			<b>Result of (Re)Assessment</b>	\$	<b>294,248.36</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
 \_\_\_\_\_  
  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/06/01 To: 2015/06/30

**Reference Number: 15183000232360368**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 1,212,010.00 Cr	\$	1,069,170.15 Cr	\$	142,839.85
Section 285 Penalty	\$ 0.00	\$	35,709.96	\$	35,709.96
					=====
			<b>Net Adjustment</b>	\$	<b>178,549.81</b>
Interest and Penalty				\$	117.44
Refund Interest				\$	86,641.46
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>265,308.71</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003937

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/07/01 To: 2015/07/31

Reference Number: 15217000232360122

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 81,446.68 Cr	\$ 47,874.01 Cr	\$ 33,572.67
Section 285 Penalty	\$ 0.00	\$ 8,393.16	\$ 8,393.16
		<b>Net Adjustment</b>	<b>\$ 41,965.83</b>
Interest and Penalty			\$ 12.65
Refund Interest			\$ 20,177.67
Arrears Interest			
		<b>Result of (Re)Assessment</b>	<b>\$ 62,156.15</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/09/01 To: 2015/09/30

**Reference Number: 15274000232360700**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 238,683.63 Cr	\$	54,207.03 Cr	\$	184,476.60
Section 285 Penalty	\$ 0.00	\$	46,119.15	\$	46,119.15
					=====
			<b>Net Adjustment</b>	\$	<b>230,595.75</b>
Interest and Penalty				\$	109,365.15
Arrears Interest				\$	109,365.15
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>339,960.90</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003938

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/10/01 To: 2015/10/31

Reference Number: 15306000632360449

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 222,791.04 Cr	\$ 17,415.58 Cr	\$ 205,375.46
Section 285 Penalty	\$ 0.00	\$ 51,343.86	\$ 51,343.86
		<b>Net Adjustment</b>	<b>\$ 256,719.32</b>
Interest and Penalty			\$ 120,202.80
Arrears Interest			\$ 376,922.12
		<b>Result of (Re)Assessment</b>	<b>\$ 376,922.12</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

—  
  
=



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/11/01 To: 2015/11/30

**Reference Number: 15335000232360938**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 161,364.22 Cr	\$	6,001.04 Cr	\$	155,363.18
Section 285 Penalty	\$ 0.00	\$	38,840.79	\$	38,840.79
					=====
			<b>Net Adjustment</b>	\$	<b>194,203.97</b>
Interest and Penalty				\$	89,816.64
Arrears Interest				\$	89,816.64
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>284,020.61</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	Refer to Summary

0003939

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2015/12/01 To: 2015/12/31

Reference Number: 16004000332360532

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 164,642.19 Cr	\$ 41,039.05 Cr	\$ 123,603.14
Section 285 Penalty	\$ 0.00	\$ 30,900.78	\$ 30,900.78
		<b>Net Adjustment</b>	<b>\$ 154,503.92</b>
Interest and Penalty			\$ 70,425.85
Arrears Interest			\$ 70,425.85
		<b>Result of (Re)Assessment</b>	<b>\$ 224,929.77</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

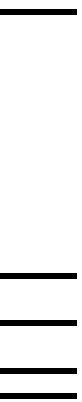
We have provided you details pertaining to this (re)assessment previously at the time of our examination.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

**GENERAL INFORMATION**

For more information on Notices of (Re)Assessment, and your objection and appeal rights, see Guide RC4022, General Information for GST/HST Registrants, or visit [canada.ca/revenue-agency](http://canada.ca/revenue-agency). To prevent unnecessary delays when you correspond with us, please provide your Business Number.







Sudbury ON P3A 5C1

999 GOLD DEPOT (CANADA)  
LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003985

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**RESULTS**

This notice explains the results of our audit (re)assessment of return(s) you have or may have previously filed. Please refer to the "Summary of (Re)Assessment" for the specific period(s) covered.

<b>Result of this (Re)Assessment</b>	\$	19,697,156.37
<b>Prior Balance</b>	\$	1,203,925.27 Cr
		=====
<b>Total Balance</b>	\$	18,493,231.10

Payments will not appear on this notice of assessment if we have not processed your payment yet. If you have already paid the balance owing, please ignore this message and accept our thanks.

To see the latest account information, including payment transactions, go to [canada.ca/my-cra-business-account](http://canada.ca/my-cra-business-account) on the CRA's website.

We may take legal action to collect debts that are not paid voluntarily.

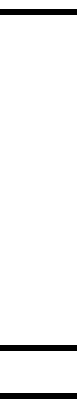
Need to make a payment? Pre-authorized debit is now available for businesses. At your convenience, a pre-authorized debit agreement can be set up using the CRA's My Business Account service. For more information on payment options, go to [canada.ca/payments](http://canada.ca/payments).

Please keep this Notice of (Re)Assessment for your records.

For more information, phone or write to:

Greater Toronto Area West TSO  
5800 Hurontario Street  
Mississauga ON L5R 4B4  
Toll free number 1-800-959-8281 (Canada and United States)

Bob Hamilton  
Commissioner of Revenue





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/01/01 To: 2016/01/31

**Reference Number: 16032000432360066**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 218,917.69 Cr	\$	\$ 57,234.57 Cr	\$	161,683.12
Section 285 Penalty	\$ 0.00	\$	\$ 40,420.78	\$	40,420.78
			<b>Net Adjustment</b>	\$	<b>202,103.90</b>
Interest and Penalty				\$	90,991.62
Arrears Interest				\$	90,991.62
			<b>Result of (Re)Assessment</b>	\$	<b>293,095.52</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003986

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/02/01 To: 2016/02/29

Reference Number: 16061000232360478

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 219,722.14 Cr	\$ 53,650.90 Cr	\$ 166,071.24
Section 285 Penalty	\$ 0.00	\$ 41,517.81	\$ 41,517.81
		<b>Net Adjustment</b>	<b>\$ 207,589.05</b>
Interest and Penalty			\$ 92,254.55
Arrears Interest			\$ 92,254.55
		<b>Result of (Re)Assessment</b>	<b>\$ 299,843.60</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/03/01 To: 2016/03/31

**Reference Number: 16092000332360007**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 231,549.89 Cr	\$	10,437.31 Cr	\$	221,112.58
Section 285 Penalty	\$ 0.00	\$	55,278.14	\$	55,278.14
			<b>Net Adjustment</b>	\$	<b>276,390.72</b>
Interest and Penalty				\$	121,067.57
Arrears Interest				\$	121,067.57
			<b>Result of (Re)Assessment</b>	\$	<b>397,458.29</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003987

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/04/01 To: 2016/04/30

Reference Number: 16123000732360607

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 190,730.14 Cr	\$ 22,571.35 Cr	\$ 168,158.79
Section 285 Penalty	\$ 0.00	\$ 42,039.69	\$ 42,039.69
		<b>Net Adjustment</b>	<b>\$ 210,198.48</b>
Interest and Penalty			\$ 90,796.04
Arrears Interest			\$ 300,994.52
		<b>Result of (Re)Assessment</b>	<b>\$ 300,994.52</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

—  
  
=



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/05/01 To: 2016/05/31

**Reference Number: 16153000232360776**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 321,069.57 Cr	\$	21,521.33 Cr	\$	299,548.24
Section 285 Penalty	\$ 0.00	\$	74,887.06	\$	74,887.06
					=====
			<b>Net Adjustment</b>	\$	<b>374,435.30</b>
Interest and Penalty				\$	159,487.62
Arrears Interest				\$	159,487.62
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>533,922.92</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003988

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/06/01 To: 2016/06/30

Reference Number: 16186000232360705

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 311,379.84 Cr	\$ 60,563.11 Cr	\$ 250,816.73
Section 285 Penalty	\$ 0.00	\$ 62,704.18	\$ 62,704.18
		<b>Net Adjustment</b>	<b>\$ 313,520.91</b>
Interest and Penalty			\$ 131,652.47
Arrears Interest			\$ 131,652.47
		<b>Result of (Re)Assessment</b>	<b>\$ 445,173.38</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/07/01 To: 2016/07/31

**Reference Number: 16215000432360221**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 336,354.03 Cr	\$	73,593.13 Cr	\$	262,760.90
Section 285 Penalty	\$ 0.00	\$	65,690.22	\$	65,690.22
					=====
			<b>Net Adjustment</b>	\$	<b>328,451.12</b>
Interest and Penalty				\$	136,052.72
Arrears Interest				\$	136,052.72
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>464,503.84</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003989

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/08/01 To: 2016/08/31

Reference Number: 16245000232360218

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 416,995.52 Cr	\$ 49,191.10 Cr	\$ 367,804.42
Section 285 Penalty	\$ 0.00	\$ 91,951.10	\$ 91,951.10
		<b>Net Adjustment</b>	<b>\$ 459,755.52</b>
Interest and Penalty			\$ 187,570.80
Arrears Interest			\$ 187,570.80
		<b>Result of (Re)Assessment</b>	<b>\$ 647,326.32</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/09/01 To: 2016/09/30

**Reference Number: 16277000232360545**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 451,929.97 Cr	\$	63,726.23 Cr	\$	388,203.74
Section 285 Penalty	\$ 0.00	\$	97,050.93	\$	97,050.93
					=====
			<b>Net Adjustment</b>	\$	<b>485,254.67</b>
Interest and Penalty				\$	195,161.20
Arrears Interest				\$	195,161.20
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>680,415.87</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003990

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/10/01 To: 2016/10/31

Reference Number: 16306000232360826

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 327,193.98 Cr	\$ 49,027.20 Cr	\$ 278,166.78
Section 285 Penalty	\$ 0.00	\$ 69,541.69	\$ 69,541.69
		<b>Net Adjustment</b>	<b>\$ 347,708.47</b>
Interest and Penalty			\$ 137,795.45
Arrears Interest			\$ 485,503.92
		<b>Result of (Re)Assessment</b>	<b>\$ 485,503.92</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/11/01 To: 2016/11/30

**Reference Number: 16340000132360866**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 347,821.08 Cr	\$	32,806.04 Cr	\$	315,015.04
Section 285 Penalty	\$ 0.00	\$	78,753.76	\$	78,753.76
					=====
			<b>Net Adjustment</b>	\$	<b>393,768.80</b>
Interest and Penalty				\$	19.06
Refund Interest				\$	152,379.64
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>546,167.50</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003991

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2016/12/01 To: 2016/12/31

Reference Number: 17003000132360915

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 250,976.97 Cr	\$ 12,322.87 Cr	\$ 238,654.10
Section 285 Penalty	\$ 0.00	\$ 59,663.52	\$ 59,663.52
		<b>Net Adjustment</b>	<b>\$ 298,317.62</b>
Interest and Penalty			\$ 114,842.17
Arrears Interest			\$ 413,159.79
		<b>Result of (Re)Assessment</b>	<b>\$ 413,159.79</b>

**EXPLANATION**

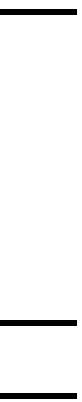
The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/01/01 To: 2017/01/31

**Reference Number: 17032000332360778**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 433,055.61 Cr	\$	14,750.90	\$	447,806.51
Section 285 Penalty	\$ 0.00	\$	111,951.62	\$	111,951.62
					=====
			<b>Net Adjustment</b>	\$	<b>559,758.13</b>
Interest and Penalty					
Arrears Interest				\$	210,913.57
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>770,671.70</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/03/01 To: 2017/03/31

**Reference Number: 17093000332360128**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 484,343.68 Cr	\$	92,176.61 Cr	\$	392,167.07
Section 285 Penalty	\$ 0.00	\$	98,041.76	\$	98,041.76
					=====
			<b>Net Adjustment</b>	\$	<b>490,208.83</b>
Interest and Penalty				\$	178,910.83
Arrears Interest				\$	178,910.83
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>669,119.66</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003993

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/04/01 To: 2017/04/30

Reference Number: 17121000632360956

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 202,552.93 Cr	\$ 44,342.68 Cr	\$ 158,210.25
Section 285 Penalty	\$ 0.00	\$ 39,552.56	\$ 39,552.56
		<b>Net Adjustment</b>	<b>\$ 197,762.81</b>
Interest and Penalty			\$ 71,725.78
Arrears Interest			\$ 269,488.59
		<b>Result of (Re)Assessment</b>	<b>\$ 269,488.59</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/05/01 To: 2017/05/31

**Reference Number: 17152000232360655**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 235,161.80 Cr	\$	6,117.89 Cr	\$	229,043.91
Section 285 Penalty	\$ 0.00	\$	57,260.97	\$	57,260.97
					=====
			<b>Net Adjustment</b>	\$	<b>286,304.88</b>
Interest and Penalty				\$	102,110.99
Arrears Interest				\$	102,110.99
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>388,415.87</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003994

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/06/01 To: 2017/06/30

Reference Number: 17185000232360770

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 208,280.18 Cr	\$ 33,017.64 Cr	\$ 175,262.54
Section 285 Penalty	\$ 0.00	\$ 43,815.63	\$ 43,815.63
		<b>Net Adjustment</b>	<b>\$ 219,078.17</b>
Interest and Penalty			\$ 76,875.19
Arrears Interest			\$ 76,875.19
		<b>Result of (Re)Assessment</b>	<b>\$ 295,953.36</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/07/01 To: 2017/07/31

**Reference Number: 17213000232360793**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 196,294.89 Cr	\$	40,988.11 Cr	\$	155,306.78
Section 285 Penalty	\$ 0.00	\$	38,826.69	\$	38,826.69
					=====
			<b>Net Adjustment</b>	\$	<b>194,133.47</b>
Interest and Penalty				\$	67,068.02
Arrears Interest				\$	67,068.02
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>261,201.49</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003995

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/08/01 To: 2017/08/31

Reference Number: 17244000132360807

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 387,508.69 Cr	\$ 55,568.53 Cr	\$ 331,940.16
Section 285 Penalty	\$ 0.00	\$ 82,985.04	\$ 82,985.04
		<b>Net Adjustment</b>	<b>\$ 414,925.20</b>
Interest and Penalty			\$ 140,873.53
Arrears Interest			\$ 140,873.53
		<b>Result of (Re)Assessment</b>	<b>\$ 555,798.73</b>

**EXPLANATION**

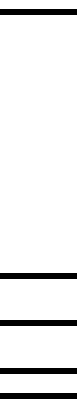
The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/09/01 To: 2017/09/30

**Reference Number: 17275000332360724**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 128,782.35 Cr	\$	43,122.64 Cr	\$	85,659.71
Section 285 Penalty	\$ 0.00	\$	21,414.92	\$	21,414.92
					=====
			<b>Net Adjustment</b>	\$	<b>107,074.63</b>
Interest and Penalty				\$	35,777.05
Arrears Interest				\$	35,777.05
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>142,851.68</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003996

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/10/01 To: 2017/10/31

Reference Number: 17305000232360779

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 185,636.14 Cr	\$ 84,321.15 Cr	\$ 101,314.99
Section 285 Penalty	\$ 0.00	\$ 25,328.74	\$ 25,328.74
		<b>Net Adjustment</b>	<b>\$ 126,643.73</b>
Interest and Penalty			\$ 41,641.29
Arrears Interest			\$ 41,641.29
		<b>Result of (Re)Assessment</b>	<b>\$ 168,285.02</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/11/01 To: 2017/11/30

**Reference Number: 17335000232360170**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 215,708.67 Cr	\$	54,820.78 Cr	\$	160,887.89
Section 285 Penalty	\$ 0.00	\$	40,221.97	\$	40,221.97
			<b>Net Adjustment</b>	\$	<b>201,109.86</b>
Interest and Penalty				\$	64,964.73
Arrears Interest				\$	266,074.59
			<b>Result of (Re)Assessment</b>	\$	<b>266,074.59</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003997

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2017/12/01 To: 2017/12/31

Reference Number: 18005000232360336

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 231,252.90 Cr	\$ 31,759.40 Cr	\$ 199,493.50
Section 285 Penalty	\$ 0.00	\$ 49,873.37	\$ 49,873.37
		<b>Net Adjustment</b>	<b>\$ 249,366.87</b>
Interest and Penalty			\$ 79,011.23
Arrears Interest			\$ 79,011.23
		<b>Result of (Re)Assessment</b>	<b>\$ 328,378.10</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/01/01 To: 2018/01/31

**Reference Number: 18032000332360356**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 442,139.21 Cr	\$	115,014.13 Cr	\$	327,125.08
Section 285 Penalty	\$ 0.00	\$	81,781.27	\$	81,781.27
			<b>Net Adjustment</b>	\$	<b>408,906.35</b>
Interest and Penalty				\$	127,558.46
Arrears Interest				\$	127,558.46
			<b>Result of (Re)Assessment</b>	\$	<b>536,464.81</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003998

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/02/01 To: 2018/02/28

Reference Number: 18060000232360969

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 360,900.01 Cr	\$ 58,377.20 Cr	\$ 302,522.81
Section 285 Penalty	\$ 0.00	\$ 75,630.70	\$ 75,630.70
		<b>Net Adjustment</b>	<b>\$ 378,153.51</b>
Interest and Penalty			\$ 116,025.45
Arrears Interest			\$ 116,025.45
		<b>Result of (Re)Assessment</b>	<b>\$ 494,178.96</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/03/01 To: 2018/03/31

**Reference Number: 18092000332360666**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 402,014.55 Cr	\$	99,753.43 Cr	\$	302,261.12
Section 285 Penalty	\$ 0.00	\$	75,565.28	\$	75,565.28
					=====
			<b>Net Adjustment</b>	\$	<b>377,826.40</b>
Interest and Penalty				\$	3.11
Refund Interest				\$	113,621.42
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>491,450.93</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0003999

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/04/01 To: 2018/04/30

Reference Number: 18121000432360389

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 355,279.09 Cr	\$ 56,535.78 Cr	\$ 298,743.31
Section 285 Penalty	\$ 0.00	\$ 74,685.82	\$ 74,685.82
		<b>Net Adjustment</b>	<b>\$ 373,429.13</b>
Interest and Penalty			\$ 110,035.85
Arrears Interest			\$ 110,035.85
		<b>Result of (Re)Assessment</b>	<b>\$ 483,464.98</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/05/01 To: 2018/05/31

**Reference Number: 18152000332360357**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 480,585.74 Cr	\$	52,666.52 Cr	\$	427,919.22
Section 285 Penalty	\$ 0.00	\$	106,979.80	\$	106,979.80
					=====
			<b>Net Adjustment</b>	\$	<b>534,899.02</b>
Interest and Penalty				\$	79.00
Refund Interest				\$	151,924.31
Arrears Interest				\$	=====
			<b>Result of (Re)Assessment</b>	\$	<b>686,902.33</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

The amount of refund interest shown is a debit adjustment to interest that we previously paid to you. You can deduct this amount from your income in the reporting period you pay it.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004000

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/06/01 To: 2018/06/30

Reference Number: 18184000332360017

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 492,988.62 Cr	\$ 64,510.39 Cr	\$ 428,478.23
Section 285 Penalty	\$ 0.00	\$ 107,119.55	\$ 107,119.55
		<b>Net Adjustment</b>	<b>\$ 535,597.78</b>
Interest and Penalty			\$ 150,632.20
Arrears Interest			\$ 150,632.20
		<b>Result of (Re)Assessment</b>	<b>\$ 686,229.98</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/07/01 To: 2018/07/31

**Reference Number: 18213000332360404**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 553,881.55 Cr	\$	65,905.77 Cr	\$	487,975.78
Section 285 Penalty	\$ 0.00	\$	121,993.94	\$	121,993.94
					=====
			<b>Net Adjustment</b>	\$	<b>609,969.72</b>
Interest and Penalty				\$	167,474.29
Arrears Interest				\$	167,474.29
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>777,444.01</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004001

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/08/01 To: 2018/08/31

Reference Number: 18247000232360161

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 405,478.36 Cr	\$ 57,929.73 Cr	\$ 347,548.63
Section 285 Penalty	\$ 0.00	\$ 86,887.15	\$ 86,887.15
		<b>Net Adjustment</b>	<b>\$ 434,435.78</b>
Interest and Penalty			\$ 116,555.70
Arrears Interest			\$ 116,555.70
		<b>Result of (Re)Assessment</b>	<b>\$ 550,991.48</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_  
  
\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/09/01 To: 2018/09/30

**Reference Number: 18274000232360908**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 337,241.32 Cr	\$	30,120.25 Cr	\$	307,121.07
Section 285 Penalty	\$ 0.00	\$	76,780.26	\$	76,780.26
					=====
			<b>Net Adjustment</b>	\$	<b>383,901.33</b>
Interest and Penalty				\$	100,714.26
Arrears Interest				\$	100,714.26
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>484,615.59</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.



999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004002

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/10/01 To: 2018/10/31

Reference Number: 18305000232360479

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 503,419.14 Cr	\$ 94,962.96 Cr	\$ 408,456.18
Section 285 Penalty	\$ 0.00	\$ 102,114.04	\$ 102,114.04
		<b>Net Adjustment</b>	<b>\$ 510,570.22</b>
Interest and Penalty			\$ 130,521.65
Arrears Interest			\$ 641,091.87
		<b>Result of (Re)Assessment</b>	<b>\$ 641,091.87</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/11/01 To: 2018/11/30

**Reference Number: 18337000232360639**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 518,580.10 Cr	\$	174,409.39 Cr	\$	344,170.71
Section 285 Penalty	\$ 0.00	\$	86,042.67	\$	86,042.67
			<b>Net Adjustment</b>	\$	<b>430,213.38</b>
Interest and Penalty				\$	107,375.24
Arrears Interest				\$	107,375.24
			<b>Result of (Re)Assessment</b>	\$	<b>537,588.62</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004003

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2018/12/01 To: 2018/12/31

Reference Number: 19002000432360074

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 516,041.13 Cr	\$ 63,514.31 Cr	\$ 452,526.82
Section 285 Penalty	\$ 0.00	\$ 113,131.70	\$ 113,131.70
		<b>Net Adjustment</b>	<b>\$ 565,658.52</b>
Interest and Penalty			\$ 137,680.46
Arrears Interest			\$ 137,680.46
		<b>Result of (Re)Assessment</b>	<b>\$ 703,338.98</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_

\_\_\_\_\_

=====

=====



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/01/01 To: 2019/01/31

**Reference Number: 19032000332360338**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 313,336.98 Cr	\$	131,815.36 Cr	\$	181,521.62
Section 285 Penalty	\$ 0.00	\$	45,380.40	\$	45,380.40
					=====
			<b>Net Adjustment</b>	\$	<b>226,902.02</b>
Interest and Penalty				\$	53,784.40
Arrears Interest				\$	53,784.40
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>280,686.42</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004004

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/02/01 To: 2019/02/28

Reference Number: 19060000332360013

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 276,232.29 Cr	\$ 76,822.27 Cr	\$ 199,410.02
Section 285 Penalty	\$ 0.00	\$ 49,852.50	\$ 49,852.50
		<b>Net Adjustment</b>	<b>\$ 249,262.52</b>
Interest and Penalty			\$ 57,638.61
Arrears Interest			\$ 306,901.13
		<b>Result of (Re)Assessment</b>	<b>\$ 306,901.13</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.





Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/03/01 To: 2019/03/31

**Reference Number: 19091000732360115**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 301,103.80 Cr	\$	94,517.25 Cr	\$	206,586.55
Section 285 Penalty	\$ 0.00	\$	51,646.63	\$	51,646.63
					=====
			<b>Net Adjustment</b>	\$	<b>258,233.18</b>
Interest and Penalty				\$	58,190.61
Arrears Interest				\$	58,190.61
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>316,423.79</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004005

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/04/01 To: 2019/04/30

Reference Number: 19121000532360008

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 391,612.23 Cr	\$	72,585.96 Cr	\$	319,026.27
Section 285 Penalty	\$ 0.00	\$	79,756.56	\$	79,756.56
					=====
			<b>Net Adjustment</b>	\$	<b>398,782.83</b>
Interest and Penalty				\$	87,442.69
Arrears Interest				\$	87,442.69
					=====
			<b>Result of (Re)Assessment</b>	\$	<b>486,225.52</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/05/01 To: 2019/05/31

**Reference Number: 19154000232360909**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 408,201.29 Cr	\$	\$ 50,309.84 Cr	\$	357,891.45
Section 285 Penalty	\$ 0.00	\$	\$ 89,472.86	\$	89,472.86
			<b>Net Adjustment</b>	\$	<b>447,364.31</b>
Interest and Penalty				\$	8,221.47
Arrears Interest				\$	8,221.47
			<b>Result of (Re)Assessment</b>	\$	<b>455,585.78</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

We have charged you arrears interest because you did not pay the amount owing by the due date.

For your information we have attached a statement explaining how we have calculated interest.

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004006

**NOTICE OF (RE)ASSESSMENT**  
**GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/06/01 To: 2019/06/30

**Reference Number: 19183000532360685**

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 421,338.93 Cr	\$ 146,479.60 Cr	\$ 274,859.33
Section 285 Penalty	\$ 0.00	\$ 68,714.83	\$ 68,714.83
		<b>Net Adjustment</b>	<b>\$ 343,574.16</b>
		<b>Result of (Re)Assessment</b>	<b>\$ 343,574.16</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

\_\_\_\_\_  
  
 \_\_\_\_\_  
  
 \_\_\_\_\_



Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/07/01 To: 2019/07/31

**Reference Number: 19213000332360780**

	Previous Assessment		Revised Assessment		Adjustments
Net Tax	\$ 207,476.36 Cr	\$	114,293.00 Cr	\$	93,183.36
Section 285 Penalty	\$ 0.00	\$	23,295.84	\$	23,295.84
			<b>Net Adjustment</b>	\$	<b>116,479.20</b>
			<b>Result of (Re)Assessment</b>	\$	<b>116,479.20</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

999 GOLD DEPOT (CANADA) LIMITED

Date	March 2, 2023
Business Number	88745 5749 RT0001
Period Covered	2016-01-01 to 2019-08-31

0004007

**NOTICE OF (RE)ASSESSMENT  
GOODS AND SERVICES TAX/HARMONIZED SALES TAX (GST/HST)**

**SUMMARY OF (RE)ASSESSMENT**

RE: GST/HST Return

Reporting Period From: 2019/08/01 To: 2019/08/31

Reference Number: 19246000432360171

	Previous Assessment	Revised Assessment	Adjustments
Net Tax	\$ 132,170.61 Cr	\$ 91,614.69 Cr	\$ 40,555.92
Section 285 Penalty	\$ 0.00	\$ 10,138.98	\$ 10,138.98
		<b>Net Adjustment</b>	<b>\$ 50,694.90</b>
		<b>Result of (Re)Assessment</b>	<b>\$ 50,694.90</b>

**EXPLANATION**

The Net Tax amount does not take into consideration any rebate, instalment or payment amounts that have been applied to the account.

We charged you a penalty under section 285 of Part IX of the Excise Tax Act.

The details of your assessment were displayed on the statement of audit adjustments we provided to you previously during the audit.

**GENERAL INFORMATION**

For more information on Notices of (Re)Assessment, and your objection and appeal rights, see Guide RC4022, General Information for GST/HST Registrants, or visit [canada.ca/revenue-agency](http://canada.ca/revenue-agency). To prevent unnecessary delays when you correspond with us, please provide your Business Number.





***THIS IS EXHIBIT "G" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL' followed by a large, stylized flourish, is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***



TSO, Scarborough ON M1P 4Y3

<b>Date</b>	May 13, 2024
<b>Account Number</b>	88745 5749 RT0001
<b>Case number</b>	GB2313 7181 8482

999 GOLD DEPOT (CANADA)  
LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

Subject: Notices of objection for the periods of April 1, 2013, to December 31, 2015 (GB2313 7181 8482) , and January 1, 2016, to August 31, 2019 (GB2316 6153 8281)

Dear Agop Aksu,

We are reviewing your objections and the related reassessments to which you filed the objections.

The basis of your objections is that you are incorrectly assessed GST/HST collectible of \$36,286.08 and you are entitled to input tax credits (ITCs) claimed in the amount of \$15,658,841.56. Your representation is that you were not part of a carousel scheme or any other type of schemes, you entered into real transactions of scarp gold (unrefined gold) with your suppliers, and you were diligent and stopped dealing with suppliers who were involved with carousel scheme. You also object to the gross negligence penalty charged in the amount of \$3,923,781.16.

A review of the facts and documents shows the following:

You are correctly assessed additional GST/HST collectible of \$36,283.08 for the period ended June 30, 2019, pursuant to subsection 225(1) of the Excise Tax Act (ETA), as invoices to customers showing amounts collected on account of tax were not recorded and not reported on the GST/HST returns.

You are not entitled to the ITCs claimed in the amount of \$15,658,841.56, pursuant to subsections 169(1) and 169(4) of the ETA, as the transactions between you and other carousel scheme participants (the participants) were not in the course of commercial activity and your ITC claims are supported by sham documents.

Evidence is that you were a willing participant in a scrap gold carousel scheme, which involved a network of participants, many of whom worked in collusion. Erol Aksu, in his capacity as director, did not take any steps to mitigate the scheme, but supported it.

The scrap gold you purchased from the participants in the scheme is comprised primarily of debased pure gold. Abnormally high purchase volumes are a reliable indicator of a carousel scheme and the distribution of debased pure gold. The purity and composition of the purported scrap gold you purchased indicate that there are injections of pure gold, which has been debased, into the supply chain. These injections are evidenced by abnormally high purity levels for some vendors, by the absence of other precious metals in the melts records, and by the presence of gold bar increments in the melts from some vendors.

Of the 20 suppliers, only 5 distributed normal levels of scrap gold (less than 1kg of scrap gold per week) and those who distributed exceedingly high volumes did so from unfavourable business locations, such as small office spaces hidden inside of buildings or from residential addresses. Also, these alleged suppliers were not supported by marketing or advertising for scrap gold gathering and did not have bona fide sources of scrap gold and of substantiated suppliers.

Your representation is that you demonstrated diligence by ceasing business with 2287429 Ontario Inc., who was reported to be involved in this scheme; however, you subsequently engaged in business relationship with other parties associated with this same supplier and the value and volume of the transactions with these new suppliers were sufficient to offset the value of the transactions with the former supplier. For example, JK Jewellery, a new supplier was owned by the brother of 2287429 Ontario Inc's shareholder.

Further evidence is that the director Erol Aksu had formed a rental agreement via a company he owns, 2534899 Ontario Inc. with one of your largest suppliers, 1994930 Ontario Inc. It is reasonable to conclude that you would have known that the supplier just set-up the office at 315-221 Victoria Street and a new entrant to the industry, but you engaged in the purchase of high volumes of scrap gold and failed to respond to the many red flags regarding these entity.

Many of the suppliers are either physically located in Quebec, or have shareholder/owners who reside in Quebec. All of these entities are connected to the director and operated in succession to your largest supplier of purported scrap.

The alleged suppliers did not claim ITCs for anything other than scrap gold, suggesting no other operating expenses. All or almost all of the GST/HST paid to these suppliers was unremitted.

It is observed that all of the suppliers found to have provided you with bona fide scrap gold continued transacting after the audit started. In contrast, almost all of the purported suppliers providing debased pure gold ceased transacting with you once the audit started. It is also noted that the decrease in the number of suppliers is not attributable to unfavourable market conditions.

It is reasonable to conclude that you would have an understanding of the intricacies associated with operating a scrap gold gathering business and would be knowledgeable in respect of the normal volumes, normal purity levels, and normal composition of scrap gold jewellery.

Evidence is that you have participated in and perpetuated a carousel scheme. Since it has been established in jurisprudence that a carousel scheme does not constitute commercial activity, the documents associated with that scheme are not in connection with commercial activity and cannot be considered to meet documentary requirements as well. This is because the invoices do not provide the true supplier of the scrap gold, and the true nature of the supply (if actually provided) is misrepresented by the invoices. In addition, the suppliers named on the invoices did not acquire an inventory of scrap gold from which to make supplies, nor did they have the financial capital necessary in order to make such acquisitions.

Appeals position is that the gross negligence penalty was correctly imposed since you knowingly, or in circumstances amounting to gross negligence, participated in or made false statement or omission in your returns, form, certificate, or statements. Appeals agree with Audit position that you were a willing participant in a scrap gold carousel scheme. The scheme involved a highly sophisticated and well organized network of participants, many of whom worked in collusion to deceive the Minister and benefit from appropriated amounts that were collected as or on account of GST/HST. Further, you took no action to ensure that the alleged suppliers were in fact the true suppliers as indicated on the invoices. Also, the amount of ITCs claimed without sufficient supporting documentation is material both in dollar amount and as percentage of the total ITCs claimed. Moreover, while it is necessary at least one party to the invoice be aware that it is a sham documentation, the behaviour and knowledge of the other parties can range from active to complicit to willfully blind participant.

Based on the reasons stated above, the Appeals Division is proposing to confirm the reassessments.

We will hold your file for 15 calendar days from the date of this letter. This will give you the opportunity to make additional representations that were not submitted earlier or to tell us if you agree with our position. If we do not receive a reply by May 24, 2024, we will process your objection as proposed, with no further contact.

You can send us any additional information through My Business Account by selecting "Submit documents" and entering the case number (GBXXXXXXXXXXXX, no spaces) into the Case/reference number box.

You can send documents by fax to **1-866-443-4955** or **705-670-6649**.

If you have any questions, please contact me at **1-905-516-9658**.

To help us serve you better, contact us online using My Business Account at **canada.ca/my-cra-business-account**. Also, sign up to receive email notifications. Email notifications from the Canada Revenue Agency will let you know when there is mail to view or when important changes are made to the account. Email notifications are available in My Account, My Business Account or Represent a Client (for registered filers). This will allow us to communicate more quickly with you.

Sincerely,

Jency Mathew  
Appeals Officer  
Appeals Division

c.c.: OSLER HOSKIN & HARCOURT LLP

***THIS IS EXHIBIT "H" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "AL" followed by a stylized flourish, is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***

RAPPORT DE VÉRIFICATION DE TRANSMISSION

HEURE : 05/28/2024 14:41  
NOM : OSLER  
FAX : 5149048101  
TÉL : 5149048100  
#SER. : 000F9V678636

DATE, HEURE	05/28 14:36
NUMÉRO/NOM FAX	918664434955
DURÉE	00:04:59
PAGE(S)	14
RÉSULTAT	OK
MODE	STANDARD
	MCE

Osler, Hoskin & Harcourt LLP  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

OSLER

Facsimile transmission

Montréal

Toronto

Calgary

Ottawa

Vancouver

New York

To:	City:	Telephone:	Fax:
Name/Company			
Jency Mathew	Scarborough		1.866.443.4955
Appeals Officer, Canada Revenue Agency			
From:	Ref No.:	Date:	No. of pages:
Louis Tassé	1234478	May 28, 2024	14 (including cover)
514.904.8170			
ltasse@osler.com			

999 Gold Depot (Canada) Limited (the "Taxpayer")  
Account number: 88745 5749 RT0001  
Case Number: GB2313 7181 8482

**Osler, Hoskin & Harcourt LLP**  
1000 De La Gauchetière Street West  
Suite 2100  
Montréal, Québec, Canada H3B 4W5  
514.904.8100 MAIN  
514.904.8101 FACSIMILE

**OSLER**

Montréal

## Facsimile transmission

Toronto

<b>To:</b>	<b>City:</b>	<b>Telephone:</b>	<b>Fax:</b>
<b>Name/Company</b>			
Jency Mathew	Scarborough		1.866.443.4955
Appeals Officer, Canada			
Revenue Agency			

Calgary

Ottawa

Vancouver

<b>From:</b>	<b>Ref No.:</b>	<b>Date:</b>	<b>No. of pages:</b>
Louis Tassé	1234478	May 28, 2024	14 (including cover)
514.904.8170			
ltasse@osler.com			

New York

### **999 Gold Depot (Canada) Limited (the “Taxpayer”)**

**Account number: 88745 5749 RT0001**

**Case Number: GB2313 7181 8482**

**NOTICE:** This communication is intended to be received only by the individual or entity to whom or to which it is addressed and contains information that is privileged, confidential and subject to copyright. Any unauthorized use, copying, review or disclosure is prohibited. Please notify the sender immediately if you received this communication in error by calling 416.862.6498 (calling collect, if necessary) so that we can arrange for its return at our expense. Thank you for your assistance and cooperation.

Montréal

May 28, 2024

Louis Tassé  
Direct Dial: 514.904.8170  
ltasse@osler.com

Toronto

Calgary

Ottawa

**By Facsimile (866.443.4955)**

Vancouver

Jency Mathew  
Appeals Officer  
Canada Revenue Agency  
Appeals Division  
Tax Services Office  
Scarborough, ON M1P 4Y3

New York

Dear Madam:

**999 Gold Depot (Canada) Limited (the “Taxpayer”)**

**Account number: 88745 5749 RT0001**

**Case Number: GB2313 7181 8482**

Further to your letter dated May 13, 2024, where you outline the Canada Revenue Agency’s (“CRA”) preliminary position with regards to the notice of objection filed on behalf of the Taxpayer, we are providing our response to the various elements that you raised in said letter.

As you will see, we are providing comments with regards to almost all of your points. In addition, we believe important to make some comments about one particular aspect of CRA’s position both at Audit and at Appeals.

Preliminary comments

As we have discussed along with my colleague Alan Kenigsberg on April 29, 2024, the auditor has reached a number of conclusions that in his view support his position. We have been asking the auditor<sup>1</sup> and we will now ask you to confirm the facts, documents and information that support such conclusions. It is utterly astonishing that CRA would proceed with the issuance of such a monstrous notice of assessment against the Taxpayer and at the same time, refuse to provide the underlying facts supporting the allegations made by CRA in issuing such notice of assessment.

That the Taxpayer purchased scrap gold is a fact. That it sent the scrap gold to external refiners is a fact. That the Taxpayer then sold the purified gold to third parties is a fact.

---

<sup>1</sup> See letters of June 16, 2022, July 15, 2022 and of September 7, 2022 from Osler, Hoskin Harcourt to Nelson Greenleaves.

That the Taxpayer made a small profit (usually about 2%) on the scrap gold it purchased, purified and sold is a fact. Claiming that the Taxpayer purchased scrap gold as part of a carousel scheme of which the only “benefit” it received was its regular profit on the sale of the gold is a conclusion, not a fact. In order to reach such a conclusion, CRA must rely on facts. Despite the numerous demands, we have yet to get a confirmation of the facts that support the conclusions reached by CRA. This is unacceptable behaviour on the part of the CRA.

In addition, it is abundantly clear that the Taxpayer went beyond the requirements of the *Excise Tax Act* (“**ETA**”) by requesting *inter alia* a copy of the identification of the person delivering the scrap gold and a copy of a certificate of incorporation of the supplier and confirmed that the person they were dealing with was an officer of the company<sup>2</sup>. This information provided CRA with a clear paper trail of the transactions and gave the CRA everything that was needed to assess the suppliers and the individual directors of those suppliers that might have not remitted the HST collected.

### Your preliminary position

We will now review the elements raised in your letter of May 13, 2024, in the same order, starting with the paragraphs that outline your review of the facts and documents.

*\$36,283.08 collectible*

Could you provide more information about this item?

*No commercial activities and sham documents*

You state at page 1 of your letter that “the transactions between you and other carousel scheme participants (the participants) were not in the course of commercial activity and your ITC claims are supported by sham documents.”

There is no dispute with the CRA that the Taxpayer entered into transactions to purchase scrap gold (what the auditor has alleged, without providing any evidence to support such conclusion is “debased gold” but regardless is gold of less than 99.5% purity), purified the scrap gold into pure gold and sold pure gold to third party customers.

There are clear definitions of “commercial activity” and “business” at subsection 123(1) ETA, and it is as clear that the Taxpayer carried on a commercial activity. The auditor confirmed that the Taxpayer generated a profit from such transactions, which falls squarely within the above noted definitions. In particular, “commercial activity” of a person is

---

<sup>2</sup> The complete list of steps taken by the Taxpayer with its suppliers can be found at para. 19 of the Reasons for objection.

defined to mean: “(a) a business carried on by the person... except to the extent to which the business involves the making of exempt supplies by the person”. As the Taxpayer engaged in the exact same transactions (i.e. buying scrap gold, processing the gold and selling the pure gold) with all of its suppliers, including those that remitted the HST to the CRA and for which there is no assessment, there is no reasonable position to take that the Taxpayer did not purchase the scrap gold (for which it paid HST) as part of its commercial activities.

We are not aware of any decisions from Canadian courts that would have established that a commercial activity would cease to be one because someone in the chain did not remit the tax. We are not aware of any cases where a court has said that commercial activities would cease to be commercial activities even where they are carried on as part of a carousel scheme (which again we do not believe is the case here). Kindly provide us with the references to the legislation you are relying on to conclude that no commercial activities occurred, or any supporting legal decisions, if they exist.

If you are relying on decisions from a foreign jurisdiction, we would find such a reliance to be totally inappropriate, given the clear wording of the ETA. That said, we are also not aware of any foreign case law which could be remotely relevant. How is the CRA ignoring not only the clear wording of the ETA but also the application of constant jurisprudence for more than 30 years as to what constitutes a business and commercial activities? If you are indeed relying on decisions rendered in a foreign jurisdiction, that are applying a different piece of legislation, we ask you to provide copies of the same.

The Taxpayer did have the proper documentation to support its claim for input tax credits, as expressed by the Tax Court of Canada in *Fiera Foods Company v. R.*<sup>3</sup>. You will note that in that case, the CRA relied heavily on the fact that the suppliers had failed to remit the HST paid by Fiera Foods Company, argued that Fiera should have been aware of the fraud, and also argued that the name on the invoices were not that of the true suppliers. Fiera was successful in getting the assessments overturned at the Tax Court, which ultimately stated that:

*The actions of the Agencies are not the actions of the Appellant and nothing in the scheme of the ETA leads to a contrary conclusion. Each had its obligations under the ETA and only the Agencies failed to meet those obligations, albeit in an egregious fashion. ... The Appellant simply claimed input tax credits that any reasonable person in the circumstances of the Appellant would believe were available under the ETA.*

---

<sup>3</sup> 2023 TCC 140.

The CRA's position with respect to the Taxpayer is squarely in contradiction with this recent decision, which has not been appealed.

With regards to the conclusion that the invoices from the suppliers are sham documents, we have yet to see any evidence that the names in the invoices were not that of the true suppliers. On the contrary, the Taxpayer obtained documentation that established unequivocally that the true suppliers were as shown in the invoices. The Taxpayer has also unequivocally shown that it purchased the quantities of scrap gold based on documents it has from the third-party US processor of the gold. Whether such suppliers reported the transactions or not would only show that they were or not in compliance with sales taxes obligations, and whether they remitted the correct tax, nothing more. A person that makes a taxable supply does not stop to be a supplier under the ETA if it fails or refuses to remit the HST. The CRA's conclusion that the invoices were sham documents is not based on the facts, the ETA or the case law. On the contrary, it is based on pure fabrication flowing from the premise that the suppliers failed to remit the HST collected.

*Willing participant in a scrap gold carousel*

You state, again at page 1, that the "evidence is that you were a willing participant in a scrap gold carousel scheme, which involved a network of participants, many of whom worked in collusion. Erol Aksu, in his capacity as director, did not take any steps to mitigate the scheme, but supported it."

We would ask you to confirm what facts and document establish that:

1. There was a scrap gold carousel scheme. In particular, that the suppliers would have purchased the pure gold from the Taxpayer, debased it and resold it as scrap gold to the Taxpayer.
2. Mr. Erol Aksu was aware of the existence of such scheme.
3. Mr. Erol Aksu was a willing participant to such scheme.
4. What benefit did the Taxpayer receive by being a participant in such scheme?
5. Who are the participants to such scheme?
6. There was collusion between some participants to the scheme.
7. Which participants worked in collusion?
8. Mr. Erol Aksu was aware of the existence of such participants.
9. Mr. Erol Aksu was aware of the existence of collusion between such participants.

10. Mr. Erol Aksu supported the scheme.

11. What steps should or could have been taken by Mr. Erol Aksu to mitigate the scheme (other than just ceasing the business of purchasing scrap gold, refining it and selling it)?

The allegation that Mr. Erol Aksu was a willing participant in and supported a scrap gold carousel scheme is a very serious one. In order to be valid, it has to be supported by objective evidence, not vague assertions that are not grounded on the facts or reality. We note that in your letter, you do not engage with any of the arguments raised in our letter of September 2022 that are supported by case law. On what basis does the CRA reject the authority of those court decisions?

*Purchase volumes and purity of gold*

You further state at the bottom of page 1: “The scrap gold you purchased from the participants in the scheme is comprised of debased pure gold. Abnormally high purchase volumes are a reliable indicator of a carousel scheme and the distribution of debased pure gold. The purity and composition of the purported scrap gold you purchased indicate that there are injections of pure gold, which has been debased, into the supply chain. These injections are evidenced by abnormally high purity levels for some vendors, by the absence of other precious metals in the melt records and by the presence of gold bar increments in the melts from some vendors,”

We would ask you to confirm the following:

1. What constitutes an “abnormally high purchase volume”?
2. What is the benchmark used to reach such a conclusion? Why 1 kg of scrap gold as opposed to 0.5, 5, 10 or 20 kg per week?
3. On what basis would high purchase volume be indicative that the Supplier might be a fraudster?
4. What constitutes high purity levels?
5. If high purity levels are an indication of fraud, why were the supplies with the highest purity levels not part of what the CRA is alleging are part of a carousel scheme?
6. What is the benchmark used to reach such a conclusion?

7. On what basis would high purity levels be indicative that the Supplier might be a fraudster?
8. On what basis did the CRA conclude that there was an absence of other precious metals in the scrap gold in question?
9. On what basis is the absence of other precious metals in the scrap gold indicative that the Supplier might be a fraudster?
10. What do you mean by “gold bar increments in the melts”?
11. What vendors had gold bar increments in their melts?
12. On what basis is the presence of gold bar increments in the melts from some vendors indicative that the Supplier might be a fraudster?

We would ask you to confirm what facts, information or documents establish:

1. The existence of abnormally high purchase volumes.
2. The supposedly high purity levels.
3. The injection into or debasement of pure gold.
4. The absence of other precious metals.
5. The presence of gold bar increments in the melts from some vendors.
6. That the scrap gold purchased by the Taxpayer is comprised primarily of debased pure gold.

With regards to the level of purity of gold, we have explained in the course of our conference call and in our submissions that such level varies significantly from one supplier to the other. On its face, there is simply nothing nefarious about a high gold purity level.

In any event, the facts do not support this argument. The highest purity level of purchases made by the Taxpayer during the period at issue was 92.22% in 2017 from 9425659 Canada Inc., a supplier that was not disallowed by the CRA. Transactions with the same supplier in 2018 and 2019 reached purity levels of 90.53 and 90.58% respectively. Likewise, transactions with another supplier that was accepted by CRA (2408750 Ontario Inc.) were above 88% for the audit period. As such, if one actually looks at the facts, it is clear that a high purity level has absolutely nothing to do, and is not any sort of indication of fraud.

In addition, the average purity level of the suppliers at issue ranged from a low of 54.59% to a high of 89.45%. By comparison, the average purity levels of the allowed suppliers ranged from 42.31% to 90.58%, a range that is very similar though broader than those which were denied. As the range of purities of gold on transactions where the suppliers remitted the HST to the CRA is broader than the range where ITCs were denied on both ends (i.e. the highest and lowest percentages went to businesses where the ITCs were allowed), this clearly demonstrates that any argument suggesting that the purity of gold has anything to do with fraud is inherently and obviously flawed, and has absolutely no scientific merit. As per our earlier submissions, if someone was actually debasing gold as suggested by the auditor, the cost of any other metals would be insignificant to the cost of the gold, so based on this fact alone it seems obvious that the auditor's position that the percentage of gold is any indication of fraud is completely incorrect even if you continue to ignore all of the other factors set out above which clearly demonstrate that the auditor's position is completely made up.

With regards to the conclusion that the Taxpayer was a willing participant in a carousel scheme, the sole involvement of the Taxpayer with the suppliers at issue was to purchase scrap gold, which was then purified and sold to third parties. As the Taxpayer did the exact same activities with suppliers where ITCs were allowed, and did not make any different return on the different supplies, the conclusion that the Taxpayer is somehow involved in a carousel scheme is baseless.

Again, the Taxpayer treated the disputed suppliers in the same fashion as its other suppliers that were not disallowed by the CRA. The only distinguishing factor between the disputed and the allowed suppliers is that the former did not remit the HST collected, a fact that is confidential and that the CRA was unwilling to communicate to, and never would communicate to the Taxpayer. More importantly, these facts are clearly irrelevant to determine whether a registrant should be allowed input tax credits on its taxable purchases, as we have explained in our September 7, 2022 letter.

### *Distribution of normal levels of scrap gold*

You state at the top of page 2: "Of the 20 suppliers, only 5 distributed normal levels of scrap gold (less than 1kg of scrap gold per week) and those who distributed exceedingly high volumes did so from unfavourable business locations, such as small office spaces hidden inside of buildings or from residential addresses. Also, these alleged suppliers were not supported by marketing or advertising for scrap gold gathering and did not have bona fide sources of scrap gold and of substantiated suppliers."

You refer to 1 kg of scrap gold purchased per week as not being a normal level of scrap gold. Again, we would ask you to confirm where that level comes from.

You also refer to unfavourable business locations of the suppliers. First, please confirm which specific addresses you are considering as unfavourable business locations. Second, kindly confirm what constitutes an unfavourable business location in the context of a scrap gold supplier. Third, under what authority is this relevant, given that the suppliers did deliver scrap gold to the Taxpayer? Fourth, assuming that this is a relevant consideration, you will note that the majority of the suppliers were located in a “gold building” (a building where a number of scrap gold businesses operated), the opposite of an unfavourable business location, and a sign that they were in the business of selling gold.

You refer to the lack of marketing or advertising for scrap gold gathering and the lack of bona fide sources of scrap gold for the suppliers. First, kindly confirm under what authority any of those elements are relevant to the issue of whether or not the Taxpayer could claim input tax credits for the purchases of scrap gold? Second, how did CRA establish that the suppliers did not market or advertise for scrap gold gathering and did not have bona fide sources for scrap gold? While this statement has been made, we have been given absolutely no evidence to suggest that this was the case, or that the CRA even looked into this. Third, in any event, any information about the sources of scrap gold for the suppliers is not within the knowledge of the Taxpayer (nor of any taxpayers for that matter). How can CRA rely on information obtained *post facto*, that was not within the knowledge of the Taxpayer, to substantiate its position? These conclusions all fly in the face of the *Fiera Foods* decision which expressly denied these sorts of arguments.

### *Due Diligence*

You further state at page 2: “Your representation is that you demonstrated diligence by ceasing business with 2287429 Ontario Inc., who was reported to be involved in the scheme; however, you subsequently engaged in business relationship with other parties associated with this same supplier and the value and volume of the transactions with these new suppliers were sufficient to offset the value of the transactions with the former supplier. For example, JK Jewellery, a new supplier was owned by the brother of 2287429 Ontario Inc’s shareholder.”

As mentioned earlier and as detailed in our letter of September 7, 2022 and in the Reasons for objection, the Taxpayer went well beyond the requirements of the ETA in terms of requesting documents to substantiate the transactions. It is disturbing that the CRA would consider that a registrant that kept a paper trail that allows the CRA to track precisely who made the supplies and collected the HST, would not be acting diligently.

With regards to JK Jewellery that was owned by the brother of 2287429 Ontario Inc., kindly confirm how CRA became aware of that fact. Second, how could the Taxpayer know this at the time? Third, is this the only supplier that would show, according to CRA, that the Taxpayer did not act with due diligence?

We note that in many of the cases where the CRA has expressed facts on which it relies on to claim that the Taxpayer should have known of the fraud, the Taxpayer did not know, and had no reasonable basis for knowing about these facts. When the Taxpayer found out that a company was being assessed for failure to remit HST to the CRA, it immediately stopped dealing with that supplier. It seems that the CRA is relying on facts that there is no question that the CRA knew, but that the Taxpayer did not know at the time in order to form the basis that the Taxpayer was involved in fraud. Following this argument, the CRA would itself be involved in the fraud, as there is no question that the CRA knew that the suppliers were engaged in fraud due to the CRA's audits, and not only did the CRA not provide this information to the Taxpayer, the CRA did not in most cases even cancel the supplier's GST registration number, and even registered new companies for GST which it knew was owned by the brother of a person who the CRA suspected was engaged in fraud. As the CRA knew everything that it is alleging that the Taxpayer should have known, why did the CRA chose to register the new companies for GST, and why did it fail to cancel the registration numbers of the companies it suspected were engaged in fraud? If the CRA had done either of these tasks, then the Taxpayer would never have paid the suppliers HST as they would not have been registered. How can the CRA allege that the Taxpayer is engaged in a carousel scheme when the CRA had more information and did nothing to stop the suspected fraud (and in fact took numerous actions to help advance the fraud by registering these companies for GST)?

### *Suppliers in Quebec*

You also state at page 2: "Many of the suppliers are either physically located in Quebec, or have shareholder/owners who reside in Quebec. All of these entities are connected to the director and operated in succession to your largest supplier of purported scrap."

We would ask you to confirm the following:

1. What suppliers are you referring to?
2. How did the CRA determine that the suppliers were physically located in Quebec?
3. If true, how is the fact that some suppliers might be physically located in Quebec relevant to the issue?
4. Who is the director that would be connected to the suppliers in Quebec and on the basis of what documents or information has the CRA establish such connection?

*Lack of ITCs claimed*

You state, again at page 2: “The alleged suppliers did not claim ITCs for anything other than scrap gold, suggesting no other operating expenses. All or almost all of the GST/HST paid to these suppliers was unremitted.”

The information about the ITCs claimed by the suppliers is confidential and within the sole knowledge of the CRA. It is evident that CRA would never even consider providing such information to the Taxpayer. Again, while this is information the CRA was at all times aware of (as the CRA processed these supplier’s returns), it is not something the Taxpayer could ever know. As such, based on the CRA’s theory, this would be evidence of the CRA’s gross negligence or involvement in the fraud, but should clearly not be relevant to the Taxpayer who had no way of knowing this information.

In addition, if the suppliers at issue decided to operate under the radar, which is likely the case since they did not remit the HST, they would have likewise not claimed ITCs. Such a conduct would only show that the suppliers were not compliant, not that they did not incur any expenses. As stated by the Tax Court of Canada in *Salaison Lévesque Inc. v. R.*, the fact that a placement agency did not declare the salaries paid to its employees does not mean that it did not pay such salaries.<sup>4</sup>

Finally, you mentioned that almost all of the suppliers did not remit the HST. Is this a reference to Gold & Silver mentioned in our letter of September 7, 2022? Where there any other suppliers that remitted, in whole or in part, the HST? For the suppliers that did remit the HST, kindly explain on what basis the CRA can disallow the ITC? If the answer is that CRA considers that the purchase of scrap gold was not made as part of commercial activities such that HST was not payable, then the Taxpayer is entitled to obtain a refund of the HST paid by error under section 261, failing which the CRA would have collected the same amount twice (once from the supplier(s) that remitted the HST and again from the ITCs disallowed to the Taxpayer). Such a conclusion would be patently unacceptable.

*Decrease of number of suppliers*

You state, still at page 2: “It is observed that all of the suppliers found to have provided you with bona fide scrap gold continued transacting after the audit started. In contrast, almost all of the purported suppliers providing debased pure gold ceased transacting with you once the audit started.”

It is unclear how the fact that the Taxpayer stopped dealing with suppliers once the CRA denied ITCs for HST or suggested that it would deny ITCs for HST paid to them is relevant

---

<sup>4</sup> 2014 TCC 36, at para. 34.

to the issue. Would the fact that the Taxpayer continued to do business with companies once the CRA suggested they were committing fraud be an indication that the Taxpayer was not involved in the fraud? Clearly the CRA auditor would have used this as a basis for saying how the Taxpayer was involved in the fraud. As there is nothing that the Taxpayer could have done in this situation that the CRA would not have held against them, it is obvious that this fact has absolutely nothing to do with the assessment. The suggestion that a Taxpayer who stops doing business with a supplier once it receives information from the CRA that the supplier might be engaged in fraud is patently ridiculous.

In any event, as explained in our letter of September 7, 2022, this behaviour has been considered favourably by the Tax Court of Canada in *Sport Collection Paris Inc. c. R.*<sup>5</sup> We struggle to see how it could be seen as detrimental to the Taxpayer's position that they stopped dealing with companies once there was any indication of fraud. On the contrary, the case law relies on this same fact to conclude that the Taxpayer was acting with care.

#### *Intricacies of scrap gold business*

You state also at page 2: "It is reasonable to conclude that you would have an understanding of the intricacies associated with operating a scrap gold gathering business and would be knowledgeable in respect of the normal volumes, normal purity levels, and normal composition of scrap gold jewellery."

This argument is based on the unsubstantiated premise that there is any such thing as normal volume, normal purity levels and normal composition of scrap gold jewellery, and the assumption that the CRA auditor, who is not and has never been a gold expert, has a clue what these volumes, purity levels and normal composition would be. It is also totally unsubstantiated, as CRA, despite our numerous demands, has never provided any support for this position. In addition, we have explained above that those elements are irrelevant, as shown clearly by the facts.

#### *Carousel scheme is not a commercial activity*

You state in the penultimate paragraph at page 2: "Evidence is that you have participated in and perpetuated a carousel scheme. Since it has been established in jurisprudence that a carousel scheme does not constitute commercial activity, the documents associated with that scheme are not in connection with commercial activity and cannot be considered to meet documentary requirements. This is because the invoices do not provide the true supplier of the scrap gold, and the nature of the supply (if actually provided) is misrepresented by the invoices. In addition, the suppliers named on the invoices did not

---

<sup>5</sup> 2006 TCC 394, para. 16.

acquire an inventory of scrap gold from which to make supplies, nor did they have the financial capital necessary in order to make such acquisitions.”

In addition to the arguments raised above with regards the CRA’s flawed conclusion that the Taxpayer did not make the purchases at issue as part of commercial activities, we would point out the following.

First, the taxpayer has a clear paper trail that establishes the identity of the suppliers, as shown in the invoices. On this sole basis, the CRA’s conclusion that the invoices do not provide the true supplier of the scrap gold is factually wrong.

Second, the CRA’s argument that the suppliers did not acquire inventory of scrap gold and did not have the financial capital necessary to make such acquisitions is based on another flawed premise: that the supplier did not have a business because such business was not declared to the tax authorities. An expense is an expense, whether it is claimed in an income tax return or not. Likewise, the fact that the registrant does not claim ITCs does not mean that it does not incur expenses. As mentioned by the Tax Court of Canada in the aforementioned *Salaison Lévesque* decision, there is a clear distinction between resources and declared resources<sup>6</sup>. The point being that if resources are not declared, it does not mean that such resources do not exist. This is even assuming that the Taxpayer had the information that was only available to the CRA (that no ITCs were claimed), which clearly it did not, nor has the CRA suggested any basis as to how the Taxpayer could ever know this information.

Third, the evidence is clear: the suppliers did, as a matter of fact, supply the scrap gold to the Taxpayer, which scrap gold was purified and then sold as pure gold to third parties. Those transactions are real, not fictitious, and CRA has not presented even the beginning of evidence to demonstrate the contrary. Further, even the CRA auditor has not suggested that no gold was sold, as presumably the auditor knew that this baseless conclusion was not supported by the facts. Rather, the CRA auditor argues that the gold that the Taxpayer purchased was “debased gold”. Regardless of what name the auditor wants to give the gold, there is clear agreement that the suppliers sold gold that was not 99.5% pure. This is a taxable supply, and as the suppliers were registered for GST by the CRA, the Taxpayer had no choice but to pay them the HST. Further, as the Taxpayer processed the gold in the same way for all parties, the conclusion that the Taxpayer was not engaged in commercial activities is clearly baseless and incorrect in fact and law.

---

<sup>6</sup> *Salaison Lévesque*, at para. 48.

*Gross negligence penalty*

As discussed above, the Taxpayer went beyond the requirements of the ETA to document its transactions with the suppliers. It is hard to see how CRA can seriously claim that the Taxpayer was grossly negligent when in fact, it acted with extra diligence. We have asked you what else the Taxpayer could have done. If the Taxpayer could not have done anything on these transactions (other than stop their business entirely as they do not know who is remitting amounts to the CRA and who is not), the Taxpayer did nothing wrong (much less do they meet the gross negligence standard).

Also as discussed above, the conclusions relied upon by the CRA to justify the gross negligence penalty are not supported by the evidence or law. They are based on the same false or baseless assumptions.

We would appreciate if you could contact the undersigned once you have completed your analysis of the present letter so that we can discuss your conclusions and in particular the facts on which those conclusions are based.

Regards,

Osler, Hoskin & Harcourt LLP



Louis Tassé  
Partner  
LT:AK

Cc Mr. Agop Aksu  
999 Gold Depot (Canada) Limited

***THIS IS EXHIBIT "I" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL' followed by a stylized flourish, is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***

**TAX COURT OF CANADA**

BETWEEN:

**999 Gold Depot (Canada) Limited**

and

Appellant,

**HIS MAJESTY THE KING,**

Respondent.

**NOTICE OF APPEAL**

**I. ADDRESS OF APPELLANT**

The appellant, 999 Gold Depot (Canada) Limited, is a corporation whose principal place of business in the province of Ontario, is established on 27 Queen St E Suite 901, Toronto, ON M5C 2M6.

**II. REASSESSMENTS UNDER APPEAL**

1. The Canada Revenue Agency (“**CRA**”) issued Notices of Assessment dated March 2, 2023 (the “**Assessments**”) for the reporting periods from April 1, 2013 to August 31, 2019 (the “**Relevant Periods**”) of the Appellant.
2. In issuing the Assessments, the CRA increased Appellant’s liability under the *Excise Tax Act* (the “**Act**”) by disallowing input tax credits (“**ITCs**”) claimed by it for the Relevant Periods in the total amount of \$15,695,124 (the “**Denied ITCs**”) and assessing penalties under section 285 of the Act (and related interest).
3. The details of the amounts disallowed, penalties and interest claimed under the Assessments are set out in *Schedule I*.
4. Appellant filed a Notice of Objection against the Assessments on May 10, 2023.
5. More than 180 days have elapsed since the Notice of Objection was filed by Appellant.

### III. STATEMENT OF FACTS

#### *Background*

6. Appellant is a company established under the Ontario *Business Corporations Act* dealing in precious metals, with its head office located in downtown Toronto, for over 24 years.
7. Appellant is a family-owned and operated business which currently employs 5 people, including principals.
8. The core of Appellant's business is the purchase of scrap precious metals, the refinement of the scrap precious metals, and the sale of the refined precious metals.
9. Appellant usually buys scrap gold, scrap silver, scrap platinum, scrap palladium, dental scrap, grindings, filings, polishing dust and sweeps and then sends these scrap precious metals to various external counterparties in Canada and in the United States to be refined.
10. Once the precious metal is refined to bullion form, Appellant sells the bullion to its customers who are primarily investors and jewellers.
11. To carry on its business, Appellant maintains a 780 square foot facility, which comprises a dedicated customer area, with 2 customer booths as well as a melt room with 2 induction furnaces, 2 x-ray assay machines, 4 scales, 2 class 3 safes, and multiple desks and computers.
12. Though Appellant buys and sells various precious metals, as explained above, this appeal is focused on the purchase, refinement and sale of gold by Appellant because this was the focus of the CRA during its audit and the Assessments involved only gold transactions.
13. When buying scrap gold, Appellant generally pays its suppliers 98% of the value of the gold in the scrap it purchases. In addition to the very slim margin that it keeps on the purchase, Appellant can also profit from any positive variation of the value of the gold from the moment that it received the scrap gold and when it sells the pure gold on the market.
14. Appellant generally does not pay its suppliers any amounts for any metals other than gold in the scrap, in which case 98% of value of the gold is paid. Alternatively, Appellant may

agree to pay 85% of the value of all the precious metals in the scrap (gold, palladium, platinum, silver, etc.), but this is generally only done when there are significant quantities of metals other than gold in the scrap.

15. During the Reporting Periods, Appellant conducted its business with approximately 439 different suppliers of gold, consisting primarily of jewellers, jewelry manufacturers, and wholesalers.
16. Each of those suppliers attended the Appellant's facility in person (or in some cases utilized delivery services) to supply Appellant with unrefined gold which Appellant refined. As described in additional detail below, this sale of unrefined gold to Appellant for refining constituted a supply by way of sale of the unrefined gold by the customer to Appellant for GST/HST purposes.
17. For each of those purchases, Appellant (through multiple employees) performed the following functions:
  - (A) identified and validated the identity of the supplier (including the corporation and the individual, where applicable) at the opening of the supplier account. As set out in more detail below, this included obtaining the articles of incorporation for any corporation, identifying the directors of the corporation, and obtaining a copy of the individual's identification to confirm they were, in fact, dealing with a director or officer of the company;
  - (B) confirmed the identity of the person again at each supplier attendance and entry to the Appellant's premises by confirming the person was who they said they were;
  - (C) weighed and inspected the unrefined gold upon receipt in the melt room;
  - (D) melted/re-melted gold in the presence of the supplier, where applicable;
  - (E) performed multiple assays to determine the purity of the gold;
  - (F) secured the gold after melting;
  - (G) settled pricing with the supplier, based on posted market prices;

- (H) provided an assay and settlement report to the supplier;
  - (I) settled the transaction either with pure gold, payment in money (*e.g.*, draft, wire, cheque, cash), or through holding an equivalent quantity of pure gold on account for the supplier;
  - (J) consolidated melted bars into lots to be delivered to the third-party refiner for further refining; and
  - (K) settled with the third-party, final refiner by applying the value of the gold to Appellant's pool account that it maintains with the refiner and subsequently:
    - i. taking back the refined gold in the form of investment-grade, gold bars; and/or
    - ii. selling the refined gold to the final refiner and receiving a wire payment as consideration for the transaction.
18. Over the years, and during the Relevant Periods, Appellant dealt with well-established third-party refiners in Canada and the United States to refine the scrap gold, including Metalor, Valcambi and Asahi (the "**Refiners**").
19. Appellant's suppliers were all validly registered for GST/HST and charged GST/HST to Appellant, as applicable, and such GST/HST was paid by Appellant to its suppliers and claimed by Appellant as ITCs.
20. All amounts paid by Appellant in respect of GST/HST charged by the various suppliers were paid by Appellant to the suppliers as and on account of GST/HST and were taken into account as GST/HST.
21. For each purchase and sale, supporting documentation, including invoices, was prepared in the normal course of business and reported in the Appellant's books and records to reflect the actual transactions that took place between Appellant and each of its suppliers.
22. Appellant exercised diligence and took extensive precautions at each step of its dealings with its suppliers. In particular:

- (A) before onboarding suppliers, on opening a new supplier account, Appellant followed meticulous processes to document and confirm the identity of its suppliers and, where applicable, verify their GST/HST registration by asking for a copy of:
    - i. the supplier's articles (or certificate) of incorporation;
    - ii. proof of identification ("ID") of the director acting on behalf of the corporation;
    - iii. Confirming the individual they were dealing with was a director or officer of the corporation and could validly act for the corporation, and
    - iv. Confirmation of valid GST registration number on the CRA's GST registry.
  - (B) Appellant maintained its supplier records and confirmed the validity of the supplier's GST/HST registration on approximately a monthly basis.
23. While its sales volume has been high, due in part to the high value of gold, Appellant's gross profit margin on gold transactions is low (*i.e.*, typically 1-2%) which is consistent with market rates. This margin is what Appellant historically considered its "fee" for refining gold. Specifically:
- (A) Appellant purchased its unrefined gold based on the volume of gold content times the market rate, less a 1-2% discount;
  - (B) in turn, Appellant sold the refined product (*i.e.*, pure gold) at the market price; and
  - (C) from that gross margin Appellant had to pay third-party refining fees, operating expenses and income tax.
24. Appellant is, and was at all material times, registered for the GST/HST pursuant to Part IX of the Act. Its GST/HST returns are filed on a monthly basis.
25. Appellant's GST/HST returns typically included large amounts of ITCs (consisting of the GST/HST paid or payable by Appellant to its suppliers) and a comparatively small amount of GST/HST collected (as it sells primarily zero-rated precious metals, namely, pure gold) resulting in net tax refunds claimed by Appellant pursuant to paragraph 228(3)(b) of the Act.

### ***CRA Reassessments***

26. Appellant understands that the basis for the Assessments, based on the final audit letter sent by the CRA, is as follows:

(A) The CRA alleges that the gold purchased by Appellant from the suppliers was part of a carousel scheme and therefore was not purchased in the course of Appellant's commercial activities.

(B) The CRA also alleged that Appellant was part of a "scheme" which the CRA alleged involved the use of accommodation invoices, sham documents, and transactions in debased pure gold.

### **IV. ISSUES TO BE DECIDED**

27. The issues in dispute are:

- i. whether Appellant is Entitled to the Denied ITCs;
- ii. in the alternative, if the Minister was correct to conclude that the Denied ITCs were not payable for taxable supplies, which is denied by Appellant, whether, in issuing the Assessments, the Minister failed to apply an allowable rebate equal to the Denied ITCs;
- iii. whether the Minister was permitted to reassess Appellant beyond the normal reassessment period; and
- iv. whether Appellant is liable for gross negligence penalties applied under section 285 of the Act.

### **V. STATUTORY PROVISIONS AND REASONS**

28. Appellant relies, *inter alia*, on subsection 123(1) and sections 165, 169, 221, 224, 225, 228, 229, 242, 261, 285, 296 and 298, section 3 of Part IX of Schedule VI of the Act, all relevant provisions in the *Input Tax Credit Information (GST/HST) Regulations* (the "**ITC Regulations**") and any relevant regulations under the Act.

*(i) Appellant is Entitled to the Denied ITCs*

29. Pursuant to section 169 of the Act, Appellant is entitled to the Denied ITCs if:
- (A) Appellant acquired the unrefined gold during a reporting period when it was a registrant;
  - (B) GST/HST in respect of the supply of unrefined gold became payable by Appellant or was paid by Appellant without having become payable;
  - (C) Appellant acquired the unrefined gold for consumption, use or supply in the course of its commercial activities; and
  - (D) Appellant obtained sufficient evidence in such form containing information to enable the amount of the ITCs to be determined, including the documentary requirements to claim ITCs in subsection 169(4) of the Act and the ITC Regulations (the “**ITC Requirement(s)**”)
30. Appellant has met all four of the ITC Requirements for validly claiming the Denied ITCs.
31. With respect to the first ITC Requirement, Appellant acquired the unrefined gold and claimed the Denied ITCs during a reporting period during which it was a registrant. Each of the Relevant Suppliers attended the Appellant’s premises (or had gold delivered to the Appellant’s premises) and sold Appellant unrefined gold, for which the Denied ITCs were claimed, as indicated above. The Relevant Suppliers were “suppliers” as defined in the Act for purposes of these supplies by way of sale.
32. Appellant has clear evidence that it acquired the unrefined gold from the third party suppliers and has receipts from the third-party refiners to demonstrate that gold was actually purchased and refined.
33. The fact that gold was acquired and refined by Appellant was not disputed by the CRA.
34. With respect to the second ITC Requirement, GST/HST in respect of the supply of the unrefined gold became payable by Appellant, as each sale of unrefined gold by each of the

Relevant Suppliers to Appellant constituted a non-zero-rated, GST/HST taxable supply, and was thus subject to 13% GST/HST pursuant to section 165 of the Act.

35. The Relevant Suppliers were all registered for GST/HST by the CRA and charged Appellant GST/HST representing 13% of the price of the unrefined gold. The GST/HST was also paid to these suppliers, none of whom was related to Appellant.
36. Further, and in the alternative, to the extent that GST/HST did not become payable for some reason (which is strictly denied), Appellant clearly paid GST/HST on the relevant transactions, thus meeting the second ITC Requirement.
37. With respect to the third ITC Requirement, Appellant acquired the unrefined gold for supply in the course of its commercial activities, namely, in making its taxable supply of precious metals, which were zero-rated financial services pursuant to section 3 of Part IX of Schedule VI of the Act, and thus subject to GST/HST at a 0% rate pursuant to subsection 165(3) of the Act.
38. The meaning of “commercial Activities” is defined in subsection 123(1) of the Act as follows:
  - commercial activity of a person means
    - (a) a business carried on by the person (other than a business carried on without a reasonable expectation of profit by an individual, a personal trust or a partnership, all of the members of which are individuals), except to the extent to which the business involves the making of exempt supplies by the person,
    - (b) an adventure or concern of the person in the nature of trade (other than an adventure or concern engaged in without a reasonable expectation of profit by an individual, a personal trust or a partnership, all of the members of which are individuals), except to the extent to which the adventure or concern involves the making of exempt supplies by the person, and
  - ...
39. The definition of “commercial activities” is very broad and includes any business or adventure or concern of the person in the nature of trade carried on by the person, except to the extent to which the business involves the making of exempt supplies.
40. As such, any business activities that are not exempt supplies, fall in the “commercial activities” definition of the Act. There is no question that the Appellant did not engage in any exempt activities, and clearly it was engaged in a business.

41. Thus, it is clear that the unrefined gold purchased by Appellant in the course of its refining business was clearly made in the “course of a commercial activity”.
42. On one hand, the CRA takes the position that Appellant bought “debased pure gold” while on the other it concludes, without providing any reasons or evidence, that there were accommodation invoices and sham documents.
43. These theories are both baseless and contradictory; Appellant cannot, at the same time, buy what the auditor refers to as debased pure gold (*i.e.* pure gold that was transformed to a form that is less than 99.5% pure), which is clearly a taxable supply, while at the same time preparing accommodation invoices or sham documents which require that Appellant would not have bought the scrap gold (whether it was debased, or not) from the Relevant Suppliers.
44. In any event, the CRA clearly agrees that Appellant, did, as a matter of fact, acquire gold that was not 99.5% pure from the Relevant Suppliers and that this same gold was then sent to the Refiners to be refined to a pure form.
45. As such, there should be no debate on this point as it is clear that Appellant did in fact acquire the gold from the Relevant Suppliers in order to refine it and sell it, which is clearly for use in its commercial activities.
46. With respect to the last ITC Requirement, as required by subsection 169(4) of the Act, Appellant obtained sufficient evidence in such form containing such information to enable the amount of the ITCs to be determined, including information prescribed by the ITC Regulations. This evidence was in the form of supporting documentation, including invoices, prepared in the ordinary course of business.
47. Appellant even went above and beyond these requirements and asked for more documentation than what was required by law by asking for a copy of the ID of the director acting on behalf of the corporation and a copy of the articles of incorporation. This made it clear that the person they were dealing with was clearly acting for the actual supplier listed on the invoice. Appellant also verified that each of the suppliers was registered for GST/HST by the CRA on the CRA’s GST registry. As such, there is no question that the Relevant Suppliers were the ones supplying the unrefined gold. Nor is there any question

that the CRA had registered each of the Relevant Suppliers for GST, and that the GST registration was in effect at the time when the ITCs were claimed.

***Appellant Was Not Part of a Carousel Scheme***

48. There was nothing nefarious about the Appellant's business, its purchases of unrefined gold, its sale or payment of pure gold, or the gold recycling industry more generally.
49. The CRA has refused to provide any evidence to Appellant that any of the Relevant Suppliers did not actually remit the taxes collected. As such there is no evidence as to whether the CRA has collected tax from the Relevant Suppliers, or whether it has assessed the Relevant Suppliers for the same tax that they are denying ITCs to Appellant.
50. In the present case, the CRA did not provide any evidence of Appellant's participation in any "carousel scheme" or that Appellant "knowingly distributed the GST/HST refunds and refined metals to participants in the scheme" as suggested by the CRA.
51. On the contrary, Appellant did, in fact, enter into genuine transactions where it bought scrap gold for refining and did in fact refine all of the scrap gold which it purchased. There is also no evidence, or suggestion that Appellant made any money from the alleged scheme other than its small profit on the sale of the scrap gold it purchased and refined in the normal course of carrying on its business. There is also no evidence that payments flowed in a circular fashion, which is the whole basis of a "carousel scheme".
52. Appellant was the recipient of the taxable supplies of scrap gold from the Relevant Suppliers, who were GST registered suppliers, and thus Appellant was responsible for paying GST/HST to them.
53. Appellant did not "work in collusion to deceive the Minister", nor did it obtain any benefit from any such scheme. It merely purchased taxable scrap metal in the normal course of its business from GST registered suppliers to whom it paid amounts for the metal and paid the applicable taxes.
54. At all times, Appellant purchased unrefined gold and paid GST/HST in good faith as part of its refining business. All of the relevant transactions were real, commercial transactions, were properly documented and met the statutory requirements to claim ITCs.

55. As such, contrary to the CRA's position, it is clear that Appellant did not participate in any carousel scheme.

***Appellant Cannot be Held Liable if the Suppliers did not Remit the GST/HST Amounts it Paid***

56. Under the Act, suppliers are generally responsible for collecting GST/HST, as agent of the Crown pursuant to subsection 221(1) of the Act.
57. GST registered suppliers are responsible for collecting and remitting the GST/HST on their taxable supplies less any ITCs to which they are entitled under subsection 169(1) of the Act, if various conditions are met.
58. If a GST registered supplier makes a taxable supply and does not remit the applicable GST/HST on the supply, the CRA can, and usually will, assess the supplier for failing to remit such tax (though we have no knowledge if the CRA has done so in this case).
59. From the recipient's perspective, if a GST registered supplier supplies a taxable good (such as scrap gold) the recipient is required to pay the supplier, as agent of the Crown, the applicable GST/HST, and is entitled to an ITC regardless of whether the supplier remits the GST/HST to the CRA.
60. There are no provisions in the Act which would allow the recipient of the supply to choose not to pay GST/HST on a taxable supply of tangible property to a GST registered supplier, and in fact, the supplier can sue the recipient for the tax that was collectible "as though it were a debt due by the recipient to the supplier" under section 224 of the Act if it is not paid. As such, Appellant was required to pay the GST/HST to the Relevant Suppliers all of whom were registered for GST by the CRA.
61. Whether there are shortcomings elsewhere in the supply chain because certain suppliers are not remitting the GST/HST to the CRA (for instance due to bankruptcy), or even some sinister activity on the part of some supplier (which Appellant has no knowledge of), such circumstances would be of no relevance to Appellant's entitlement to the Denied ITCs.
62. Moreover, many of those suppliers still had valid GST registration numbers as of August 1st, 2022, a few weeks after the CRA's assessment proposal letter of May 27, 2022. If some suppliers had not been remitting GST/HST they have collected to the CRA, and as

the CRA has alleged, these companies were actively part of a fraud scheme, the CRA had an obligation to cancel these registrations immediately so that unsuspecting taxpayers do not continue to pay GST/HST to companies which remain registered collection agents of the Crown. Deregistration is the only way that taxpayers can see that they should not be paying GST/HST to suppliers which they would otherwise be required to pay by law. This was not done.

63. It is not appropriate for the CRA to assess Appellant for GST/HST which it correctly paid to a GST registered company (that is acting as agent for the Crown) as required by the Act. This is especially the case if the CRA is aware that some of its GST registered agents are fraudulently not remitting the GST/HST they have collected, and not only refuses to provide the information to taxpayers as to who the bad actors are, but has also not even taken the simple step of cancelling these registrations so that taxpayers like Appellant can become aware that they should not continue to pay GST/HST to these parties.

***Appellant was Diligent and Stopped Dealing with Suppliers***

64. Even if the CRA did not provide any proof or indicia of wrongdoing on any of the Relevant Supplier's part, once Appellant was made aware by the CRA that certain suppliers might not be remitting GST/HST collected to the CRA, Appellant stopped purchasing any goods from the Relevant Suppliers.
65. Contrary to the CRA's position, the decision of Appellant to stop dealing with these suppliers does not prove that it was part of a "carousel scheme" or any other type of scheme to defraud the government. On the contrary, Appellant's decision to not deal with suppliers who the CRA had suggested might not be complying with their tax obligations, even where it cost Appellant's business to do so, shows that it is a good taxpayer that will go out of its way to insure that it is not party to any fraudulent scheme and will not deal with other GST registrants who might be.
66. If the CRA's position was correct, it would lead to the conclusion that an honest taxpayer should have continued to do business with parties that the CRA alleged were involved in a fraud in order to demonstrate that it was not part of the scheme. This makes absolutely no sense.

***(ii) In the alternative, if the Minister was correct to conclude that the Denied ITCs were not payable for commercial activities, which is denied by Appellant, whether, in issuing the Assessments, the Minister failed to apply an allowable rebate equal to the Denied ITC***

67. As explained in more detail above, the Denied ITCs were correctly paid to GST registrants and should be allowed.
68. In the alternative, should it be concluded that the Denied ITCs were not payable for “commercial activities” as proposed by the CRA, which is denied by Appellant, then Appellant should not have paid the Denied ITCs and should be entitled to a corresponding rebate pursuant to section 261 of the Act if claimed in a rebate application made on the date specified in subparagraph 296(2.1)(a)(i) of the Act.
69. In assessing Appellant’s net tax for the Reporting Periods, the Minister was required to credit an amount equal to the Denied ITCs as an “allowable rebate” pursuant to subsection 296(2.1) of the Act, thus resulting in no increase to the Appellant’s net tax.

***(iii) The Minister was Not Permitted to Reassess Appellant Beyond the Normal Reassessment Period***

70. The Minister is generally required to reassess a taxpayer within the four-year limitation period set out in subsection 298(1) of the Act.
71. Subsection 298(4) of the Act provides that an assessment can be made at any time if the taxpayer made a misrepresentation in filing its returns which is attributable to the person’s neglect, carelessness or wilful default.
72. The burden is on the Minister to prove that Appellant made a misrepresentation which is attributable to its neglect, carelessness or wilful default, which it has not done in the present circumstances.
73. Even under the Minister’s theory, Appellant made taxable purchases of gold which was less than 99.5% pure from GST registered suppliers, refined the gold, and sold the refined gold. This was correct, not a misrepresentation at all, and was not related to any neglect, carelessness or wilful default.

74. As such, any periods that are beyond the four-year limitation period should not be reassessed unless the Minister provides clear evidence of Appellant having made a misrepresentation which is attributable to its neglect, carelessness or wilful default. This has not been done.

***(iv) Appellant is Not Liable for Gross Negligence Penalties***

75. Section 285 of the Act provides that “every person who knowingly, or under circumstances amounting to gross negligence, makes or participates in, assents to or acquiesces in making of a false statement or omission in a return ... made in respect of a reporting period or transaction is liable to a penalty ... if the false statement or omission is relevant to the determination of net tax of the person for a reporting period.”

76. The burden of proof is on the Minister to justify the assessment of penalties.

77. As there is no basis for the GST/HST adjustments increasing net tax, penalties under section 285 of the Act cannot apply.

78. Further, and in the alternative, the Minister has not provided any evidence to show that Appellant has knowingly, or under circumstances amounting to gross negligence, made or participated in or acquiesced in the making of a false statement or omission in a return or any other document.

79. While the Minister has the burden of proving gross negligence, the CRA has not shown any factual evidence that demonstrates that Appellant was involved in any scheme, much less that it was grossly negligent. Rather, the CRA’s case appears to be entirely based on unsupported statements and assumptions, without any evidence, that Appellant was somehow involved in some sort of fraudulent scheme with the GST registered suppliers who sold it scrap gold.

80. This is clearly not correct. As explained in detail above, Appellant was very diligent and even asked for more documents from the Relevant Suppliers than what it is required to under the Act and the ITC Regulations.

81. Accordingly, the penalties applied under section 285 of the Act do not apply and must be vacated.

82. Appellant respectfully requests that the hearing takes place in the city of Toronto, Ontario.

**VI. RELIEF SOUGHT**

83. Appellant respectfully requests that the CRA reassess the Relevant Periods to:

(A) reverse the disallowance of the Denied ITCs in the amount of \$15,695,124.

(B) reverse the assessment of penalties under section 285 of the Act in the amount of \$3,923,781; and

(C) reverse the application of any related penalty.

84. In addition to the specific relief requested above, Appellant seeks all other correlative adjustments consequential to the foregoing, including the payment of interest under the Act, and such further and other relief that may reasonably relate thereto.

Laval, February 9<sup>th</sup> 2026.



---

Louis Tassé  
**Alepin Gauthier Avocats Inc.**  
3080 boul. Le Carrefour, 400  
Laval, Québec, H7T 2R5  
Tel. : 450-681-3080, ext. 2365  
Fax : 450-681-1476  
Email : [l.tasse@alepin.com](mailto:l.tasse@alepin.com)

SCHEDULE I

<u>Reporting Period</u>	<u>Notice Reference No.</u>	<u>Amount in Dispute</u>
2013/04/01 to 2013/04/30	13121000332360226	Net Tax: \$1,276.19 S. 285 Penalty: \$319.04 Arrears Interest: \$1,065.38
2013/05/01 to 2013/05/31	13155000232360183	Net Tax: \$3,5663.89 S. 285 Penalty: \$8,915.97 Arrears Interest: \$29,046.76 Refund Interest: \$31.77
2013/06/01 to 2013/06/30	13183000332360314	Net Tax: \$59,299.78 S. 285 Penalty: \$14,824.94 Arrears Interest: \$47,812.98 Refund Interest: \$54.85
2013/07/01 to 2013/07/31	13213000232360812	Net Tax: \$61,988.71 S. 285 Penalty: \$15,497.17 Arrears Interest: \$49,137.74 Refund Interest: \$127.48
2013/08/01 to 2013/08/31	13247000132360840	Net Tax: \$64,516.92 S. 285 Penalty: \$16,129.23 Arrears Interest: \$51,088.61 Refund Interest: \$48.62
2013/09/01 to 2013/09/30	13274000232360811	Net Tax: \$84,696.68 S. 285 Penalty: \$21,174.17 Arrears Interest: \$67,050.70
2013/10/01 to 2013/10/31	13305000232360325	Net Tax: \$137,932.08 S. 285 Penalty: \$34,483.02 Arrears Interest: \$107,625.32
2013/11/01 to 2013/11/30	13336000232360455	Net Tax: \$151,247.83 S. 285 Penalty: \$37,811.95 Arrears Interest: \$116,615.39
2013/12/01 to 2013/12/31	14002000232360250	Net Tax: \$170,477.41 S. 285 Penalty: \$42,619.35 Arrears Interest: \$128,207.01 Refund Interest: \$111.79
2014/01/01 to 2014/01/31	14034000132360681	Net Tax: \$134,834.14 S. 285 Penalty: \$33,708.53 Arrears Interest: \$101,529.75

2014/02/01 to 2014/02/28	14062000232360031	Net Tax: \$140,627.36 S. 285 Penalty: \$35,156.84 Arrears Interest: \$104,790.75
2014/03/01 to 2014/03/31	14091000232360828	Net Tax: \$131,372.14 S. 285 Penalty: \$32,843.03 Arrears Interest: \$96,847.80
2014/04/01 to 2014/04/30	14121000332360267	Net Tax: \$268,234.23 S. 285 Penalty: \$67,058.55 Arrears Interest: \$195,309.61
2014/05/01 to 2014/05/31	14153000332360153	Net Tax: \$312,955.77 S. 285 Penalty: \$78,238.94 Arrears Interest: \$225,469.29
2014/06/01 to 2014/06/30	14183000332360224	Net Tax: \$324,856.69 S. 285 Penalty: \$81,214.17 Arrears Interest: \$231,400.84
2014/07/01 to 2014/07/31	14213000232360606	Net Tax: \$24,852.29 S. 285 Penalty: \$6,213.07 Arrears Interest: \$17,480.10
2014/09/01 to 2014/09/30	14274000232360684	Net Tax: \$20,486.00 S. 285 Penalty: \$5,121.50 Arrears Interest: \$14,093.46
2014/11/01 to 2014/11/30	14335000332360060	Net Tax: \$11,154.94 S. 285 Penalty: \$2,788.73 Arrears Interest: \$7,494.22
2014/12/01 to 2014/12/31	15005000332360305	Net Tax: \$42,644.68 S. 285 Penalty: \$10,661.17 Arrears Interest: \$27,799.05 Refund Interest: \$38.79
2015/01/01 to 2015/01/31	15034000332360052	Net Tax: \$101,027.04 S. 285 Penalty: \$25,256.76 Arrears Interest: \$65,735.85
2015/02/01 to 2015/02/28	15061000332360077	Net Tax: \$95,397.75 S. 285 Penalty: \$23,849.43 Arrears Interest: \$61,824.92
2015/03/01 to 2015/03/31	15091000332360259	Net Tax: \$138,469.71 S. 285 Penalty: \$34,617.42 Arrears Interest: \$88,517.50

2015/04/01 to 2015/04/30	15121000332360249	Net Tax: \$140,799.86 S. 285 Penalty: \$35,199.96 Arrears Interest: \$88,909.02
2015/05/01 to 2015/05/31	15152000232360537	Net Tax: \$156,969.06 S. 285 Penalty: \$39,242.26 Arrears Interest: \$98,037.04
2015/06/01 to 2015/06/30	15183000232360368	Net Tax: \$142,839.85 S. 285 Penalty: \$35,709.96 Arrears Interest: \$86,641.46 Refund Interest: \$117.44
2015/07/01 to 2015/07/31	15217000232360122	Net Tax: \$33,572.67 S. 285 Penalty: \$8,393.16 Arrears Interest: \$20,177.67 Refund Interest: \$12.65
2015/09/01 to 2015/09/30	15274000232360700	Net Tax: \$184,476.60 S. 285 Penalty: \$46,119.15 Arrears Interest: \$109,365.15
2015/10/01 to 2015/10/31	15306000632360449	Net Tax: \$205,375.46 S. 285 Penalty: \$51,343.86 Arrears Interest: \$120,202.80
2015/11/01 to 2015/11/30	15335000232360938	Net Tax: \$155,363.18 S. 285 Penalty: \$38,840.79 Arrears Interest: \$89,816.64
2015/12/01 to 2015/12/31	16004000332360532	Net Tax: \$123,603.14 S. 285 Penalty: \$30,900.78 Arrears Interest: \$70,425.85
2016/01/01 to 2016/01/31	16032000432360066	Net Tax: \$161,683.12 S. 285 Penalty: \$40,420.78 Arrears Interest: \$90,991.62
2016/02/01 to 2016/02/29	16061000232360478	Net Tax: \$166,071.24 S. 285 Penalty: \$41,517.81 Arrears Interest: \$92,254.55
2016/03/01 to 2016/03/31	16092000332360007	Net Tax: \$221,112.58 S. 285 Penalty: \$55,278.14 Arrears Interest: \$121,067.57

2016/04/01 to 2016/04/30	16123000732360607	Net Tax: \$168,158.79 S. 285 Penalty: \$42,039.69 Arrears Interest: \$90,796.04
2016/05/01 to 2016/05/31	16153000232360776	Net Tax: \$299,548.24 S. 285 Penalty: \$74,887.06 Arrears Interest: \$159,487.62
2016/06/01 to 2016/06/30	16186000232360705	Net Tax: \$250,816.73 S. 285 Penalty: \$62,704.18 Arrears Interest: \$131,652.47
2016/07/01 to 2016/07/31	16215000432360221	Net Tax: \$262,760.90 S. 285 Penalty: \$65,690.22 Arrears Interest: \$136,052.72
2016/08/01 to 2016/08/31	16245000232360218	Net Tax: \$367,804.42 S. 285 Penalty: \$91,951.10 Arrears Interest: \$187,570.80
2016/09/01 to 2016/09/30	16277000232360545	Net Tax: \$388,203.74 S. 285 Penalty: \$97,050.93 Arrears Interest: \$195,161.20
2016/10/01 to 2016/10/31	16306000232360826	Net Tax: \$278,166.78 S. 285 Penalty: \$69,541.69 Arrears Interest: \$137,795.45
2016/11/01 to 2016/11/30	16340000132360866	Net Tax: \$315,015.04 S. 285 Penalty: \$78,753.76 Arrears Interest: \$152,379.64 Refund Interest: \$19.06
2016/12/01 to 2016/12/31	17003000132360915	Net Tax: \$238,654.10 S. 285 Penalty: \$59,663.52 Arrears Interest: \$114,842.17
2017/01/01 to 2017/01/31	17032000332360778	Net Tax: \$447,806.51 S. 285 Penalty: \$111,951.62 Arrears Interest: \$210,913.57
2017/02/01 to 2017/02/28	17060000332360119	Net Tax: \$375,140.12 S. 285 Penalty: \$93,785.03 Arrears Interest: \$174,093.52
2017/03/01 to 2017/03/31	17093000332360128	Net Tax: \$392,167.07 S. 285 Penalty: \$98,041.76 Arrears Interest: \$178,910.83

2017/04/01 to 2017/04/30	17121000632360956	Net Tax: \$158,210.25 S. 285 Penalty: \$39,552.56 Arrears Interest: \$71,725.78
2017/05/01 to 2017/05/31	17152000232360655	Net Tax: \$229,043.91 S. 285 Penalty: \$57,260.97 Arrears Interest: \$102,110.99
2017/06/01 to 2017/06/30	17185000232360770	Net Tax: \$175,262.54 S. 285 Penalty: \$43,815.63 Arrears Interest: \$76,875.19
2017/07/01 to 2017/07/31	17213000232360793	Net Tax: \$155,306.78 S. 285 Penalty: \$38,826.69 Arrears Interest: \$67,068.02
2017/08/01 to 2017/08/31	17244000132360807	Net Tax: \$331,940.16 S. 285 Penalty: \$82,985.04 Arrears Interest: \$140,873.53
2017/09/01 to 2017/09/30	17275000332360724	Net Tax: \$85,659.71 S. 285 Penalty: \$21,414.92 Arrears Interest: \$35,777.05
2017/10/01 to 2017/10/31	17305000232360779	Net Tax: \$101,314.99 S. 285 Penalty: \$25,328.74 Arrears Interest: \$41,641.29
2017/11/01 to 2017/11/30	17335000232360170	Net Tax: \$160,887.89 S. 285 Penalty: \$40,221.97 Arrears Interest: \$64,964.73
2017/12/01 to 2017/12/31	18005000232360336	Net Tax: \$199,493.50 S. 285 Penalty: \$49,873.37 Arrears Interest: \$79,011.23
2018/01/01 to 2018/01/31	18032000332360356	Net Tax: \$327,125.08 S. 285 Penalty: \$81,781.27 Arrears Interest: \$127,558.46
2018/02/01 to 2018/02/28	18060000232360969	Net Tax: \$302,522.81 S. 285 Penalty: \$75,630.70 Arrears Interest: \$116,025.45
2018/03/01 to 2018/03/31	18092000332360666	Net Tax: \$302,261.12 S. 285 Penalty: \$75,565.28 Arrears Interest: \$113,621.42 Refund Interest: \$3.11

2018/04/01 to 2018/04/30	18121000432360389	Net Tax: \$298,743.31 S. 285 Penalty: \$74,685.82 Arrears Interest: \$110,035.85
2018/05/01 to 2018/05/31	18152000332360357	Net Tax: \$427,919.22 S. 285 Penalty: \$106,979.80 Arrears Interest: \$151,924.31 Refund Interest: 79.00
2018/06/01 to 2018/06/30	18184000332360017	Net Tax: \$428,478.23 S. 285 Penalty: \$107,119.55 Arrears Interest: \$150,632.20
2018/07/01 to 2018/07/31	18213000332360404	Net Tax: \$487,975.78 S. 285 Penalty: \$121,993.94 Arrears Interest: \$167,474.29
2018/08/01 to 2018/08/31	18247000232360161	Net Tax: \$347,548.63 S. 285 Penalty: \$86,887.15 Arrears Interest: \$116,555.70
2018/09/01 to 2018/09/30	18274000232360908	Net Tax: \$307,121.07 S. 285 Penalty: \$76,780.26 Arrears Interest: \$100,714.26
2018/10/01 to 2018/10/31	18305000232360479	Net Tax: \$408,456.18 S. 285 Penalty: \$102,114.04 Arrears Interest: \$130,521.65
2018/11/01 to 2018/11/30	18337000232360639	Net Tax: \$344,170.71 S. 285 Penalty: \$86,042.67 Arrears Interest: \$107,375.24
2018/12/01 to 2018/12/31	19002000432360074	Net Tax: \$452,526.82 S. 285 Penalty: \$113,131.70 Arrears Interest: \$137,680.46
2019/01/01 to 2019/01/31	19032000332360338	Net Tax: \$181,521.62 S. 285 Penalty: \$45,380.40 Arrears Interest: \$53,784.40
2019/02/01 to 2019/02/28	19060000332360013	Net Tax: \$199,410.02 S. 285 Penalty: \$49,852.50 Arrears Interest: \$57,638.61
2019/03/01 to 2019/03/31	19091000732360115	Net Tax: \$206,586.55 S. 285 Penalty: \$51,646.63 Arrears Interest: \$58,190.61

2019/04/01 to 2019/04/30	19121000532360008	Net Tax: \$319,026.27 S. 285 Penalty: \$79,756.56 Arrears Interest: \$87,442.69
2019/05/01 to 2019/05/31	19154000232360909	Net Tax: \$357,891.45 S. 285 Penalty: \$89,472.86 Arrears Interest: \$8,221.47
2019/06/01 to 2019/06/30	19183000532360685	Net Tax: \$274,859.33 S. 285 Penalty: \$68,714.83 Arrears Interest: \$0.00
2019/07/01 to 2019/07/31	19213000332360780	Net Tax: \$93,183.36 S. 285 Penalty: \$23,295.84 Arrears Interest: \$0.00
2019/08/01 to 2019/08/31	19246000432360171	Net Tax: \$40,555.92 S. 285 Penalty: \$10,138.98 Arrears Interest: \$0.00

***THIS IS EXHIBIT "J" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to read 'Erol Aksu', is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***

**TAX COURT OF CANADA**

BETWEEN:

**999 GOLD DEPOT (CANADA) LIMITED**

Appellant

and

**HIS MAJESTY THE KING**

Respondent

**REPLY**

**OVERVIEW**

Between April 1, 2013 and August 31, 2019, the Appellant had legitimate business activity involving the purchase and sale of scrap precious metals, while at the same time participated in a carousel scheme involving numerous non-*bona fide* suppliers (the “**Carousel Scheme**”). This appeal concerns only the Appellant’s role in the Carousel Scheme; the Appellant’s legitimate business activity is not at issue in this appeal.

The Appellant, knowingly or in circumstances amounting to wilful blindness or gross negligence, obtained false or accommodation invoices from the numerous non-*bona fide* suppliers to give the appearance that these non-*bona fide* suppliers were providing the Appellant with scrap gold. In reality, either no gold at all was exchanged, or pure gold received from the Appellant was debased and transferred to the Appellant to give the appearance of commercial activity.

Due to the Appellant’s willing participation in the Carousel Scheme, the Appellant is not entitled to any of the at-issue input tax credits and is liable for s. 285 penalties.

**TABLE OF CONTENTS**

<b>OVERVIEW</b> .....	<b>1</b>
<b>A. STATEMENT OF FACTS</b> .....	<b>4</b>
Reporting and Assessing History .....	5
Assumptions .....	6
The Appellant .....	6
The Carousel Scheme Traders .....	7
Group 1 .....	9
2287429 .....	10
G&S .....	12
Alvin.....	14
JK.....	16
1994930 .....	18
1995949 .....	19
1995891 .....	20
5010433 .....	21
Group 2 .....	23
Green Leaf.....	23
Sri.....	25
Krish .....	25
Group 3 .....	26
Naz .....	27
KTI.....	28
Cash for Gold .....	28
2337980 .....	29
Group 4 .....	31
2466778 .....	31
Roy.....	32
A&Z.....	33
Gold City.....	34
GTA.....	34
Suhaag .....	35

The Carousel Scheme .....	36
The Appellant’s role .....	36
The Carousel Scheme Traders’ roles .....	37
Sham Documents and Accommodation Invoices .....	37
Facts consistent with the existence of the Carousel Scheme .....	38
<i>ITC claim trends</i> .....	38
<i>Withholding of amounts equal to the tax payable</i> .....	39
<i>Ending of relationship with the Carousel Scheme Traders</i> .....	39
<i>Purity and composition of the debased gold</i> .....	40
<i>Appellant received gold in gold bar mass increments</i> .....	41
<i>Abnormally high volumes of gold</i> .....	41
<i>Involvement in other carousel schemes</i> .....	42
Prior Audit History .....	42
Reassessment pursuant to s. 298(4)(a) & (b) of the <i>Act</i> .....	43
The Appellant’s director had knowledge of the Carousel Scheme.....	47
Liability for penalties pursuant to s. 285 of the <i>Act</i> .....	48
False statements and circumstances relating to the Denied ITCs.....	48
Wilful blindness to the Carousel Scheme.....	49
Unremitted Tax .....	50
<b>B. ISSUES TO BE DECIDED .....</b>	<b>51</b>
<b>C. STATUTORY PROVISIONS RELIED ON .....</b>	<b>51</b>
<b>D. GROUNDS RELIED ON AND RELIEF SOUGHT .....</b>	<b>52</b>
Assessment pursuant s. 298(4)(a) & (b) of the <i>Act</i> .....	52
The Appellant is not entitled to ITCs in respect of the Carousel Scheme.....	53
The Denied ITCs do not relate to property acquired for consumption, use, or supply in the course of commercial activity .....	53
The Appellant failed to comply with s. 169(4) of the <i>Act</i> in respect of the Denied ITCs .....	54
The Appellant is not entitled to a rebate in respect of the Carousel Scheme .....	54
The Appellant is liable for penalties in respect of the Carousel Scheme .....	55
<b>SCHEDULE A .....</b>	<b>58</b>
<b>SCHEDULE B.....</b>	<b>61</b>

In reply to the Appellant's Notice of Appeal with respect to the reassessment under Part IX of the *Excise Tax Act*, RSC 1985, c E-15, as amended (the "*Act*") for the reporting periods between April 1, 2013 and August 31, 2019 (the "**Reporting Periods**"), the Respondent says:

**A. STATEMENT OF FACTS**

1. The Respondent admits the facts stated in paragraphs 1 – 6 and 24 of the Notice of Appeal.
2. The Respondent denies the allegations of fact stated in paragraphs 8, 17 and 19 – 22 of the Notice of Appeal.
3. The Respondent has no knowledge of the allegations of fact pleaded in paragraphs 7, 9 – 11, 13 – 16, 18 and 23 of the Notice of Appeal.
4. With Respect to paragraph 12 of the Notice of Appeal, the Respondent has no knowledge of the particulars of the Appellant's buying and selling of various precious metals, but admits the remainder of the facts pleaded therein.
5. With respect to paragraph 25 of the Notice of Appeal, the Respondent admits that the Appellant's returns typically reported input tax credits ("ITCs") and tax collected as pleaded therein but denies the pleaded reasons why the Appellant states it claimed large amounts of ITCs and comparatively small amounts of tax collected. The Respondent also denies that the Appellant's returns were correct.
6. With respect to paragraph 26 of the Notice of Appeal the Respondent admits the facts pleaded therein and states that the Audit Division confirmation letter speaks

for itself. For clarity, the Respondent states that the details of the Minister's assessing position are set out below. The Respondent denies any remaining facts in the said paragraph.

### **Reporting and Assessing History**

7. In its returns for the Reporting Periods, the Appellant claimed ITCs, including those denied by reassessment totalling \$15,658,841.56, as detailed in Schedule A to this Reply (the "**Denied ITCs**").
8. The Appellant filed its Goods and Services Tax (GST) / Harmonized Sales Tax (HST) returns on a timely basis for the Reporting Periods.
9. On March 2, 2023, the Minister of National Revenue (the "**Minister**") reassessed the Reporting Periods to deny the Denied ITCs. The Minister also assessed the Appellant for amounts collected as or on account of tax that were not remitted in the amount of \$36,283.08, which are not at issue in this appeal and penalties pursuant to s. 285 of the *Act*. The details of these amounts are set out in Schedule "A" to this Reply. With respect to the Reporting Periods ending prior to February 2, 2019, the Minister reassessed the Appellant pursuant to s. 298(4)(a) and (b) of the *Act*. With respect to all other reporting periods, the Minister reassessed the Appellant prior to the expiration of the period contemplated by s. 298(1)(a)(i) of the *Act*.
10. The Appellant filed a Notice of Objection for the Reporting Periods on May 10, 2023.

11. Prior to the issuance of any further reassessment or notices of confirmation, the Appellant appealed to the Tax Court of Canada in respect of the Reporting Periods pursuant to the s. 306(b) of the *Act*.

### **Assumptions**

12. In determining the Appellant's net tax liability for the Reporting Periods under appeal, the Minister made the following assumptions of fact:

### **The Appellant**

- 12.1. the Appellant was incorporated April 3, 1997;
- 12.2. the Appellant is a GST/HST registrant, since April 3, 1997;
- 12.3. the Appellant began its operations in 1997;
- 12.4. 100% of the common shares of the Appellant are held by Erol Aksu ("EA");
- 12.5. the Appellant is required to file GST/HST returns on a monthly basis;
- 12.6. the Appellant's business address is 901-27 Queen St E., Toronto, ON;
- 12.7. the Appellant leases a commercial unit at the above address;
- 12.8. the Appellant's business address is in Toronto's jewellery district;
- 12.9. the Appellant is a large-scale refinery feeder;
- 12.10. the Appellant's business is primarily the purchase and sale of scrap gold for refining;
- 12.11. the Appellant also purchases and sells other precious metals for refinement, such as silver, platinum and palladium;
- 12.12. the Appellant also sells pure gold bullion and other precious metals;

12.13. the Appellant primarily sells gold for refining to Metalor USA Refining Corporation in the United States (“**Metalor**”);

12.13.1. Metalor is a large international refiner; and

12.13.2. Metalor has a certified stamping regime issued by the London Bullion Market association;

12.14. the Appellant reported total sales of \$641,959,331 during 2013-2019;

12.15. the Appellant claimed net tax refunds of \$23,356,291 during the years 2013 – 2019;

12.16. the Appellant was involved in the trade of scrap gold during the Reporting Periods;

12.17. the Appellant also knowingly perpetuated the Carousel Scheme involving debased pure gold during the Reporting Periods, as set out below;

12.18. the Denied ITCs relate to ITCs claimed in the course of and the advancement of the Carousel Scheme and not in the course of its legitimate business activity;

### **The Carousel Scheme Traders**

12.19. the Appellant’s participation in the Carousel Scheme involved the acquisition of debased gold and the use of fake invoices or accommodation invoices from 21 entities (the “**Carousel Scheme Traders**”);

12.20. the Denied ITCs in respect of amounts paid to the Carousel Scheme Traders are detailed in Schedule B;

12.21. by acting in concert with the Carousel Scheme Traders, the Appellant perpetuated a scheme whereby:

- 12.21.1. ITCs were claimed that the Appellant were not entitled to;
- 12.21.2. the Appellant used sham documents and accommodation invoices provided by the Carousel Scheme Traders;
- 12.21.3. these sham documents and accommodation invoices were used to deceive the Minister by giving the appearance that the Appellant was acquiring scrap gold from the Carousel Scheme Traders in the course of commercial activity;
- 12.21.4. in actuality, no scrap gold was acquired by the Appellant from the Carousel Scheme Traders;
- 12.21.5. instead, the gold the Appellant acquired from the Carousel Scheme Traders was debased gold (i.e. pure gold that cheap metals such as copper had been intentionally added to in order to reduce the purity);
- 12.21.6. the source of the pure gold that the Carousel Scheme Traders debased included pure gold obtained by the Carousel Scheme Traders from the Appellant;
- 12.21.7. the Appellant provided this pure gold to the Carousel Scheme Traders, purportedly as payment for the purported scrap gold it received from the Carousel Scheme Traders;

12.21.8. the Appellant would provide the pure gold to the Carousel Scheme Traders, so that it could be repeatedly debased and reused in the Carousel Scheme; and

12.21.9. the debased gold was acquired by the Appellant for the purpose of advancing the Carousel Scheme and for the purpose of claiming ITCs the Appellant was not entitled to;

12.22. the Carousel Scheme Traders were grouped into four groups, as set out below;

Group 1

12.23. the Appellant participated in the Carousel Scheme with a group of purported suppliers located in Quebec (the “**Group 1**”), namely:

- 2287429 Ontario Inc. (“**2287429**”);
- Gold & Silver Inc. (“**G&S**”);
- Alvin Gold Inc. (“**Alvin**”);
- Ohannes Khatchirian o/a JK or JK Jewellery (“**JK**”);
- 1994930 Ontario Inc. (“**1994930**”);
- 1995949 Ontario Inc. (“**1995949**”);
- 1995891 Ontario Inc. (“**1995891**”); and
- 5010433 Ontario Inc. (“**5010433**”);

12.24. the members of Group 1 were all participants in the Carousel Scheme;

12.25. the members of Group 1 were all controlled by Johnny Khatchirian or one of his family members or associates;

2287429

- 12.26. 2287429 was a corporation that:
- 12.26.1. was incorporated in Ontario on June 3, 2011;
  - 12.26.2. became a GST/HST registrant on December 10, 2023;
  - 12.26.3. had monthly reporting periods;
  - 12.26.4. reported its main business activity as the selling of used cars;
  - 12.26.5. was determined through third-party records to be involved in the purported scrap gold trade;
  - 12.26.6. has as sole shareholder and director Johnny Khatchirian, who:
    - resides in Laval, Quebec;
    - reported total income of between \$9,800 and \$22,598 on his income tax returns during the audit period;
  - 12.26.7. never voluntarily filed its GST/HST returns;
  - 12.26.8. does not have any payroll account with the Canada Revenue Agency (“CRA”);
  - 12.26.9. never issued any Statements of Remuneration Paid (“T4 slips”) to any employees for income tax purposes;
  - 12.26.10. never filed income tax returns;
  - 12.26.11. had no internet presence;
  - 12.26.12. was subject to an audit for the periods January 2013 to December 2016 where:
    - request for information in respect of the bank accounts were made;

- no banking information was obtained;
- no information was provided by 2287429 to allow determination of the method and basis for recording sales and expenses;
- sales, tax and ITCs could not be reconciled as no returns had been filed;
- a bank deposit analysis could not be conducted;
- third-party information from the Appellant and another alleged buyer were the only sources of information as to 2287429's sales;

12.26.13. the Appellant alleged it made scrap gold purchases from during the period of January 2013 to March 2017;

12.26.14. the Appellant allegedly paid more than \$48,600,000 to on account of tax during the period of January 2013 to March 2017;

12.26.15. was allegedly the largest supplier of scrap gold to the Appellant;

12.26.16. when the Appellant ceased transacting with, the Appellant transitioned to other members of Group 1;

12.26.17. the Appellant purported to acquire 9.1 kg of scrap gold per week from, which was an exceptionally high amount of gold to acquire in one week;

12.26.18. did not supply scrap gold to the Appellant;

12.26.19. was involved with the Appellant in debasing gold and producing fake invoices;

12.26.20. the Appellant knew or ought to have known was dealing in debased gold or did not supply the Appellant with any scrap gold;

and

12.26.21. did not supply the Appellant with any scrap gold;

### *G&S*

12.27. G&S was a corporation incorporated in Ontario that:

12.27.1. became a GST/HST registrant on August 29, 2016;

12.27.2. had a business address of 111 – 221 Victoria St., Toronto, ON;

12.27.3. was located approximately 50 metres from the Appellant's business address;

12.27.4. had one registered shareholder, Nabil Sarhane, who:

- lived in a basement suite of the same residential apartment building as Johnny Khatchirian in Laval, Quebec;
- lived over 500 kilometres from the business address of G&S;
- reported income on his income tax returns averaging \$8,200 per year during the audit period;

12.27.5. never filed GST/HST returns;

12.27.6. never claimed ITCs;

12.27.7. never filed income tax returns;

12.27.8. had no reported assets;

12.27.9. had never claimed any business expenses;

12.27.10. had no internet presence;

- 12.27.11. was audited multiple times and assessed for net tax and penalties pursuant to §. 285 of the *Act* for the reporting periods covering August 2016 to December 2018;
- 12.27.12. did not respond to any attempts at contact from the CRA during the CRA's audit of itself or the Appellant;
- 12.27.13. purchased pure gold from the Appellant;
- 12.27.14. did not purchase scrap gold from any entity;
- 12.27.15. used the pure gold purchased from the Appellant to debase for sale to the Appellant in the Carousel Scheme;
- 12.27.16. issued two cheques, with 2287429 Ontario Inc. handwritten on them, to the Appellant;
- 12.27.17. the Appellant purported to acquire 5.55 kg of scrap gold per week from during 2017 – 2019;
- 12.27.18. was involved with the Appellant in debasing gold and using fake invoices;
- 12.27.19. the Appellant knew or ought to have known was dealing in debased gold or was not providing the Appellant with any gold at all; and
- 12.27.20. did not supply the Appellant with any scrap gold;
- 12.28. the assay reports of the gold acquired from G&S did not list any other precious metals;
- 12.29. it would be expected that scrap gold acquired from scrap jewellery would contain other precious metals commonly found in jewellery;

12.30. the average purity of gold from G&S purportedly acquired by the Appellant was 56.49%;

12.31. approximately 80% of the scrap gold purportedly acquired by the Appellant from G&S contained total gold in a 100 g increment (i.e. a common gold bar weight);

*Alvin*

12.32. Alvin was a corporation that:

12.32.1. was incorporated in Ontario and became a GST/HST registrant on January 10, 2017;

12.32.2. had a business address of 210-221 Victoria St., Toronto, ON;

12.32.3. had the same commercial building and business address as G&S;

12.32.4. had as sole director Bachir Khatchirian (“**Bachir**”) who:

- claimed to live at the same residential address as Johnny Khatchirian;
- was a relative of Johnny Khatchirian;
- lived over 500 km from the business address of G&S;
- reported income on his income tax returns averaging \$16,500 per year during the audit period;
- also held shares in a jewellery corporation, 4416937 Canada Inc., that was assessed \$1,190,581.56 for denied ITCs claimed;
- did not report any T4 income;

- filed for bankruptcy in 2010 and was discharged May 20, 2011;
- stated the \$30,000 start up funds for Alvin came from his savings and a loan from his uncle;

- 12.32.5. had quarterly reporting periods;
- 12.32.6. had no employees;
- 12.32.7. does not have a payroll account with the CRA;
- 12.32.8. has not filed income tax returns in respect of the years, which the Reporting Periods are in;
- 12.32.9. had no internet presence;
- 12.32.10. was audited for the reporting periods covering January 2017 to June 2019, resulting in the denial of ITCs totalling \$1,105,216.04, and s. 285 of the *Act* penalties were also assessed;
- 12.32.11. did not have any commercial activity;
- 12.32.12. did not make supplies of scrap gold;
- 12.32.13. purportedly transacted with the Appellant sixty-nine times between January 24, 2017 and June 30, 2018;
- 12.32.14. received payment from the Appellant for both the purported scrap gold and the purported amount of tax on the scrap gold in gold bars and not in cash;
- 12.32.15. purportedly provided 302.8 kg of scrap gold to the Appellant, with an average purity of 59.43% (range of 40.65% - 88.99%);

- 12.32.16. was involved in debasing pure gold and using fake invoices with the Appellant;
- 12.32.17. purported to only acquire scrap gold from G&S, which also had no supplier of scrap gold;
- 12.32.18. did not supply the Appellant with any scrap gold, and the Appellant knew this to be the case; and
- 12.32.19. used sham documents to give the illusion of scrap gold transactions in order to deceive the Minister and allow Alvin and the other Carousel Scheme Traders to claim ITCs they were not entitled to;
- 12.33. the Appellant claimed that it only dealt with Bachir directly;
- 12.34. Bachir did not know the names of its two customers, including the Appellant who allegedly accounted for 97% of Alvin's sales;
- 12.35. the Appellant claimed that Bachir came to the Appellant's office in person to sell gold;

*JK*

- 12.36. JK was a sole proprietorship operated by Ohannes Khatchirian (**"Ohannes"**) that:
  - 12.36.1. became a registrant on January 4, 2018;
  - 12.36.2. had a business address of 308-221 Victoria St., Toronto, ON, in the same building as Alvin and G&S;
  - 12.36.3. lists jewellery as its major business activity with the CRA;
  - 12.36.4. never filed its GST/HST returns;

- 12.36.5. had no internet presence;
- 12.36.6. did not make any supplies of scrap gold;
- 12.36.7. provided the Appellant fake invoices that gave the illusion that scrap gold was supplied;
- 12.36.8. the fake invoices provided to the Appellant were created to deceive the Minister as to the existence of a supply of scrap gold;
- 12.36.9. allegedly acquired scrap gold from G&S;
- 12.36.10. did not enter into any transactions for the purchase of scrap gold from G&S;
- 12.36.11. participated in the Carousel Scheme for the sole purpose of deceiving the Minister;
- 12.36.12. purported to sell 314.4 kg of scrap gold to the Appellant;
- 12.36.13. was paid in pure gold by the Appellant;
- 12.36.14. held back payment from the Appellant for an amount equal to the purported tax payable for the purported scrap gold;
- 12.36.15. the Appellant never paid for the purported tax payable on the purported scrap gold;
- 12.36.16. provided to the Appellant purported scrap gold that had an average purity of 58.32%;
- 12.36.17. did not provide any actual scrap gold to the Appellant, and instead provided debased pure gold to give the illusion of a supply of scrap gold;

12.36.18. could not have supplied the volumes of scrap gold the Appellant purported to acquire from JK;

12.36.19. when paid in pure gold by the Appellant for its purported supply of scrap gold was receiving back the gold it sold; and

12.36.20. the pure gold it was paid by the Appellant was then debased and used to perpetuate the Carousel Scheme;

12.37. Ohannes is Johnny Khatchirian's brother;

12.38. Ohannes reported income on his income tax returns of \$4,132 in 2017, \$18,142 in 2018, and \$5,956 in 2019;

12.39. Ohannes also operated a sole proprietorship selling used vehicles;

*1994930*

12.40. 1994930 was a corporation incorporated in Ontario that:

12.40.1. was incorporated May 8, 2018;

12.40.2. became a GST/HST registrant May 11, 2018;

12.40.3. never filed GST/HST returns;

12.40.4. never filed income tax returns;

12.40.5. had no payroll account with the CRA;

12.40.6. issued no T4 slips;

12.40.7. had no internet presence;

12.40.8. had a business address of 315-221 Victoria Street, Toronto, ON, in the same building as other Carousel Scheme Traders in Group 1;

12.40.9. had a sole shareholder and director of Zinnet Kosali, who:

- lived in Dorval Quebec, over 500 kilometres from 1994930's business address;
- reported income of approximately \$10,450 on her income tax returns;

12.40.10. purportedly acquired all of its scrap gold from G&S;

12.40.11. purportedly sold 81% of its scrap gold to the Appellant;

12.40.12. did not acquire any scrap gold;

12.40.13. did not sell any pure scrap gold;

*1995949*

12.41. 1995949 is a corporation incorporated in Ontario that:

12.41.1. was created and registered for the purpose of providing fake invoices;

12.41.2. had no storefront from where it could acquire gold;

12.41.3. had no public information available that would allow sellers of scrap gold to find them;

12.41.4. has no internet presence;

12.41.5. only filed four GST/HST returns;

12.41.6. never filed any income tax returns;

12.41.7. never filed any payroll returns;

12.41.8. purported to be located in Cornwall, Ontario;

12.41.9. listed with the CRA a director, Randa Agrebi, who:

- resided in Laval Quebec at the same address as G&S's director;

- had no experience in the gold industry;
- reported income on her income tax returns of \$8,400 to \$14,300;
- did not have the financial means to purchase scrap gold;

12.41.10. had no employees;

12.41.11. had no payroll account with the CRA;

12.41.12. began purportedly transacting with the Appellant within 10 days of GST/HST registration;

12.41.13. did not have the financial means to acquire scrap gold;

12.41.14. did not acquire any scrap gold;

12.41.15. did not sell any scrap gold;

12.41.16. was involved in the Carousel Scheme with the Appellant involving debased pure gold;

#### *1995891*

12.42. 1995891 was a corporation registered in Ontario that:

12.42.1. became a GST/HST registrant on January 3, 2019;

12.42.2. was created and registered for the purpose of providing fake invoices to the Appellant;

12.42.3. never filed GST/HST returns;

12.42.4. never filed income tax returns;

12.42.5. never issued T4 slips;

12.42.6. had no internet presence;

12.42.7. has no physical business;

- 12.42.8. listed with the CRA the same business address at 1995949;
- 12.42.9. purported to begin selling scrap gold within a week of GST/HST registration at a rate of over \$100,000 of gold per week;
- 12.42.10. did not have the assets to acquire \$100,000 of gold that soon after registration;
- 12.42.11. had listed with the CRA a sole shareholder and director, Fernando Pierre-Louis who:
- had no experience in the gold industry;
  - had a residential address in Laval, Quebec;
  - reported employment income from another company during the time 1995891 purportedly sold gold to the Appellant;
  - did not and could not travel to the Appellant's premises on a regular basis to sell scrap gold;
- 12.42.12. purported to be located in Cornwall, Ontario;
- 12.42.13. did not acquire any scrap gold;
- 12.42.14. did not sell any scrap gold; and
- 12.42.15. was involved in the Carousel Scheme with the Appellant involving debased pure gold;

*5010433*

12.43. 5010433 was a corporation incorporated in Ontario that:

- 12.43.1. became a registrant on January 3, 2019;

- 12.43.2. was created and registered for the purpose of providing fake invoices;
- 12.43.3. never filed GST/HST returns;
- 12.43.4. never filed income tax returns;
- 12.43.5. never issued T4 slips;
- 12.43.6. had no internet presence;
- 12.43.7. had no physical business;
- 12.43.8. listed with the CRA a business address in Quebec;
- 12.43.9. provided invoices with an address in Cornwall, Ontario;
- 12.43.10. purported to begin selling scrap gold within a week of GST/HST registration at a rate of over \$50,000 of gold per week;
- 12.43.11. did not have the assets to acquire \$50,000 of gold that soon after registration;
- 12.43.12. had listed with the CRA a sole shareholder and director, Volha Fralova, who
  - had no experience in the gold industry;
  - had a residential address in Quebec;
  - during the period 5010433 purported to sell gold to the Appellant, reported income from another corporation;
  - received social assistance during the years 2018 and 2019;
  - could not and did not travel to the Appellant's premises on a regular basis to sell scrap gold;

- 12.43.13. did not acquire any scrap gold;
- 12.43.14. did not sell any scrap gold;
- 12.43.15. was involved in the Carousel Scheme with the Appellant involving debased pure gold; and
- 12.43.16. provided fake invoices in furtherance of the Carousel Scheme;

Group 2

- 12.44. this group of the Carousel Scheme Traders were a group of corporations located in Brampton, Ontario and directed by a father, Raaman Raamkumar, his son, Raamkumar Sivarajah, or their friend Qasim Amiri (“**Group 2**”);
- 12.45. the Group 2 participants in the Carousel Scheme were the following purported suppliers of the Appellant:
  - 2593837 Ontario Inc. o/a Green Leaf Metals (“**Green Leaf**”);
  - 2407938 Ontario Inc. o/a Sri Vijeyalalitha Gold (“**Sri**”);
  - 2462300 Ontario Inc. o/a Krish Gold Impex (“**Krish**”);

*Green Leaf*

- 12.46. Green Leaf was a corporation incorporated in Ontario that:
  - 12.46.1. was incorporated and became a registrant on August 24, 2017;
  - 12.46.2. never filed GST/HST returns;
  - 12.46.3. never claimed ITCs;
  - 12.46.4. never remitted net tax;
  - 12.46.5. never filed income tax returns;
  - 12.46.6. had no assets or expenses;

12.46.7. listed a residential home in Brampton, Ontario as its business address;

12.46.8. purported to buy scrap gold from individuals and sell it in bulk;

12.46.9. had no actual commercial activity, instead existed solely as a conduit to allow the Appellant to claim ITCs that it was not entitled to;

12.46.10. listed Qasim Amiri as its sole director and shareholder, who:

- lived at the same address listed as Green Leaf's Business Address;
- was friends with a director of Sri and the director of Krish;
- was paid \$4,000 to \$5,000 monthly for his role in the Carousel Scheme;
- took instructions from Sivarajah Raamkumar in respect of his and Green Leaf's participation in the Carousel Scheme;
- never attended the Appellant's premises to deliver gold;

12.46.11. had no suppliers of scrap gold;

12.46.12. did not supply any scrap gold to the Appellant;

12.46.13. was created to be a missing trader Carousel Scheme; and

12.46.14. was involved in debasing pure gold and using fake or accommodation invoices in concert with the Appellant;

12.47. the Appellant knew of Green Leaf's Role in the Carousel Scheme;

*Sri*

- 12.48. *Sri* was a corporation incorporated in Ontario that:
- 12.48.1. was a GST/HST registrant;
  - 12.48.2. did not remit net tax;
  - 12.48.3. participated in the Carousel Scheme;
  - 12.48.4. had no commercial activity;
  - 12.48.5. had no documentation to support any purported sale of scrap gold to the Appellant other than the fake invoices created in the Carousel Scheme;
  - 12.48.6. had no financial sources to acquire scrap gold;
  - 12.48.7. had as its directors Raaman Raamkumar and Raamkumar Sivarajah during the time it purported to sell scrap gold to the Appellant:
    - Raaman Raamkumar was also the director of Krish;
  - 12.48.8. served in the Carousel Scheme as a missing trader;

*Krish*

- 12.49. *Krish* was a corporation incorporated in Ontario that:
- 12.49.1. was a GST/HST registrant;
  - 12.49.2. did not remit net tax;
  - 12.49.3. participated in the Carousel Scheme;
  - 12.49.4. had no commercial activity;

- 12.49.5. provided no documentation to support any purported sale of scrap gold to the Appellant other than the fake invoices created in the Carousel Scheme;
- 12.49.6. had no financial sources to acquire scrap gold;
- 12.49.7. also acted in an unrelated scheme whereby it would import goods claiming they were goods being returned to Canada after repair;
- 12.49.8. claimed to pay for scrap gold with pure gold;
- 12.49.9. had no source of pure gold;
- 12.49.10. was paid by the Appellant by cheque, less an amount equal to the tax payable;
- 12.49.11. during the time it purported to sell scrap gold to the Appellant, its director was Raaman Raamkumar, who was also a director of Sri;
- 12.49.12. Krish served in the Carousel Scheme as a missing trader, replacing Sri in that role in January 2017;

### Group 3

- 12.50. this group of the Carousel Scheme Traders were four corporations that were linked together due to their relationship with Dave Collia (“**Group 3**”);
- 12.51. Dave Collia directly or indirectly controlled each of the Group 3 members;
- 12.52. the Group 3 participants in the Carousel Scheme were the following purported suppliers of the Appellant:
  - Naz Enterprises Inc. (“**Naz**”);
  - KTI Corporation (“**KTI**”);
  - 2417916 Ontario Inc. o/a Cash for Gold (“**Cash for Gold**”); and,

- 2337980 Ontario Inc. (“2337980”);

*Naz*

12.53. Naz was a corporation in Ontario that:

- 12.53.1. was incorporated on January 2, 2004;
- 12.53.2. became a GST/HST registrant as of March 1, 2007;
- 12.53.3. had a payroll account with the CRA;
- 12.53.4. only had one employee, Babak Tabrizi Adeli, who was also the sole shareholder and director;
- 12.53.5. averaged a payroll of \$25,200 per year;
- 12.53.6. had no internet presence;
- 12.53.7. had minimal assets and expenses;
- 12.53.8. had no advertising expenses;
- 12.53.9. listed its business activity with the CRA as a jewellery and watch wholesaler;
- 12.53.10. had its business address in the same building as the Group 1 members;
- 12.53.11. had commercial activity unrelated to scrap gold transactions;
- 12.53.12. was involved with Dave Collia to participate in the Carousel Scheme;
- 12.53.13. provided fake invoices to further the Carousel Scheme;
- 12.53.14. did not buy and sell scrap gold; and
- 12.53.15. was involved with the Appellant in the Carousel Scheme that involved debased pure gold;

*KTI*

12.54. KTI was a corporation that:

- 12.54.1. was incorporated in Ontario on May 18, 2017;
- 12.54.2. became a registrant on October 10, 2017;
- 12.54.3. was required to file GST/HST returns on a monthly basis;
- 12.54.4. ceased filing GST/HST returns after October 31, 2018, and prior to that had numerous returns outstanding;
- 12.54.5. listed Dave Collia as its authorized representative with the CRA;
- 12.54.6. never filed income tax returns;
- 12.54.7. had no assets or expenses;
- 12.54.8. had no advertising expenses;
- 12.54.9. had no internet presence;
- 12.54.10. listed a director, Nick Discola, that had income of approximately \$93,000 as a full-time employee of a different entity in an unrelated industry;
- 12.54.11. provided fake invoices to perpetuate the Carousel Scheme;
- 12.54.12. did not acquire or sell scrap gold; and
- 12.54.13. was involved in the Carousel Scheme that involved debased gold;

*Cash for Gold*

12.55. Cash for Gold was a corporation incorporated in Ontario that:

- 12.55.1. had one transaction with the Appellant on June 11, 2019;

- 12.55.2. did not remit any amounts as net tax in respect of tax collected on the sale of scrap gold;
- 12.55.3. was part of the Carousel Scheme;
- 12.55.4. debased pure gold to give it the appearance that it was selling scrap gold to the Appellant;
- 12.55.5. provided invoices to the Appellant that were either fake invoices or accommodation invoices intending to deceive the Minister;
- 12.55.6. had the sole purpose, in its dealings with the Appellant, of deceiving the Minister into paying net tax refunds in relation to ITCs the Appellant was not entitled to;
- 12.55.7. did not acquire scrap gold from any suppliers; and
- 12.55.8. did not supply the Appellant with scrap gold;

*2337980*

- 12.56. 2337980 was a corporation that:
  - 12.56.1. was incorporated in Ontario August 7, 2012;
  - 12.56.2. became a GST/HST registrant on August 16, 2012;
  - 12.56.3. had two employees;
  - 12.56.4. had a payroll of \$72,000;
  - 12.56.5. had minimal internet presence;
  - 12.56.6. had minimal assets;
  - 12.56.7. had minimal expenses;
  - 12.56.8. had minimal advertising expenses;
  - 12.56.9. purported to sell wholesale jewellery;

- 12.56.10. had a business address at its shareholder and director's residence;
- 12.56.11. did not have commercial activity relating to scrap gold transactions;
- 12.56.12. did not have any suppliers of scrap gold;
- 12.56.13. was involved in the Carousel Scheme in order to deceive the Minister and allow for the-claiming of unwarranted ITCs;
- 12.56.14. provided documents such as invoices that were sham documents with the intent to deceive the Minister;
- 12.56.15. received and issued fake invoices relating to the purchase and sale of scrap gold;
- 12.56.16. was compensated for the purported sale of scrap gold in pure gold bars;
- 12.56.17. used the pure gold bars it received to create debased gold, which it claimed was scrap gold;
- 12.56.18. used the debased gold to perpetuate the Carousel Scheme;
- 12.56.19. did not sell scrap gold in the course of commercial activity;
- 12.56.20. purported to sell more than 1,000 kg of scrap gold during the audit period;
- 12.56.21. purported to sell scrap gold with purity of 86%, far exceeding industry standards;
- 12.56.22. was involved in debasing gold and using fake invoices with the Appellant; and

12.56.23. did not supply the Appellant with scrap gold and the Appellant was aware of this;

12.57. the sale of 1,000 kg of scrap gold was not feasible for an entity the size of 2337980 to accomplish without a commercial location or a website;

Group 4

12.58. this group consisted of the other Carousel Scheme Traders that were not members of Groups 1 – 3 (“**Group 4**”). Its members were:

- 2466778 Ontario Inc. (“**2466778**”);
- 2665988 Ontario Inc. o/a Roy Metals (“**Roy**”);
- 2388905 Ontario Inc. o/a A&Z Creations (“**A&Z**”);
- 1503329 Ontario Ltd. o/a Gold City (“**Gold City**”);
- GTA Jewellery Loan Inc. (“**GTA**”); and,
- Suhaag Jewellers Ltd. (“**Suhaag**”);

*2466778*

12.59. 2466778 was a corporation that:

12.59.1. was incorporated in Ontario and became a registrant on May 15, 2015;

12.59.2. did not file its GST/HST returns prior to being audited;

12.59.3. never filed its income tax returns;

12.59.4. had a payroll account with the CRA;

12.59.5. only issued a T4 slip to one employee, Alishaan Nasir, who was the sole shareholder and director;

- 12.59.6. had no assets or expenses;
- 12.59.7. had no internet presence;
- 12.59.8. listed its business activity with the CRA as jewellery;
- 12.59.9. had Alishaan Nasir's residence as its business address;
- 12.59.10. produced sham documents, such as fake invoices, for the purpose of hiding the Carousel Scheme;
- 12.59.11. purported to purchase and sell scrap gold in exchange for pure gold as consideration;
- 12.59.12. sold purported scrap gold with purity over 89%, which is significantly higher than the typical purity for scrap gold in North America;
- 12.59.13. purported to acquire scrap gold from other intermediaries, each of which had no commercial activity and were involved in a carousel scheme;
- 12.59.14. participated in the Carousel Scheme with the Appellant involving debased gold and fake invoices; and
- 12.59.15. did not supply the Appellant with scrap gold and the Appellant was aware of this;

*Roy*

- 12.60. Roy was a corporation incorporated in Ontario that:
  - 12.60.1. had two transactions with the Appellant, on December 6 and 10, 2018;

- 12.60.2. issued fake or accommodation invoices in support of the claim that it sold scrap gold;
- 12.60.3. the fake or accommodation invoices issued did not relate to the sale of taxable supplies in the course of commercial activity;
- 12.60.4. was involved in the Carousel Scheme with the Appellant;
- 12.60.5. did not remit any amounts as net tax in respect of tax collected on the sale of scrap gold;
- 12.60.6. did not supply scrap gold to the Appellant;
- 12.60.7. provided fake or accommodation invoices to the Appellant to allow the Appellant to claim ITCs it was not entitled to; and
- 12.60.8. did not have the skills, experience or funds to participate in the scrap gold industry at the level it purported to;

*A&Z*

- 12.61. A&Z was a corporation incorporated in Ontario that:
  - 12.61.1. had seven transactions with the Appellant between May 29, 2019 and December 31, 2019;
  - 12.61.2. was involved in the Carousel Scheme with the Appellant;
  - 12.61.3. was involved in the debasing of pure gold with the Appellant by adding other metals to give the appearance of trading in scrap gold;
  - 12.61.4. did not remit any amounts as net tax in respect of tax collected on the sale of scrap gold;

- 12.61.5. provided the Appellant with sham documents, namely fake purchase and sale invoices whose sole purpose was to deceive the Minister into paying out net tax refunds to the Appellant in respect of ITCs it was not entitled to; and
- 12.61.6. did not supply scrap gold to the Appellant;

*Gold City*

- 12.62. Gold City was a corporation incorporated in Ontario that:
  - 12.62.1. had two transactions with the Appellant, on May 24, 2019 and July 24, 2019;
  - 12.62.2. was involved in the debasing of pure gold with the Appellant to give the appearance of trading in scrap gold;
  - 12.62.3. generated fake invoices for the purpose of deceiving the Minister as to the existence of commercial activity in the trade of scrap gold;
  - 12.62.4. colluded with the Appellant in the Carousel Scheme with the sole purpose of allowing the Appellant to claim ITCs it was not entitled to in order to deceive the Minister into paying out net tax refunds the Appellant was not entitled to;
  - 12.62.5. had no sources of scrap gold; and
  - 12.62.6. did not supply any scrap gold to the Appellant;

*GTA*

- 12.63. GTA was a corporation incorporated in Ontario that:

- 12.63.1. had one transaction with the Appellant on June 10, 2019;
- 12.63.2. did not purchase or acquire scrap gold;
- 12.63.3. provided the Appellant with purported scrap gold of purity indicative of debased pure gold;
- 12.63.4. was involved in the Carousel Scheme with the Appellant;
- 12.63.5. provided the Appellant with fake invoices;
- 12.63.6. had no sources of scrap gold; and
- 12.63.7. did not supply any scrap gold to the Appellant;

*Suhaag*

- 12.64. Suhaag was a corporation incorporated in Ontario that:
  - 12.64.1. had two transactions with the Appellant, on May 21, 2019 and June 12, 2019;
  - 12.64.2. did not purchase or acquire scrap gold;
  - 12.64.3. provided the Appellant with purported scrap gold of purity indicative of debased pure gold;
  - 12.64.4. was involved in the Carousel Scheme with the Appellant;
  - 12.64.5. provided the Appellant with fake invoices;
  - 12.64.6. did not have any commercial activity;
  - 12.64.7. had no sources of scrap gold; and
  - 12.64.8. did not supply any scrap gold to the Appellant;

## **The Carousel Scheme**

12.65. the Carousel Scheme was perpetuated by the Appellant and the Carousel Scheme Traders, by way of the following actions:

12.65.1. the Appellant would claim, with the assistance of sham documents or alternatively accommodation invoices created by the Carousel Scheme Traders, ITCs it was not entitled to in order to receive a net tax refund it was not entitled to; and

12.65.2. the Carousel Scheme Traders would issue fake or accommodation invoices to the Appellant showing the Appellant purchased scrap gold from them, when in reality no scrap gold exchanged hands;

### The Appellant's role

12.66. the Appellant's role in the Carousel Scheme was primarily claiming the Denied ITCs it was not entitled to in order to receive net tax refunds it was not entitled to;

12.67. the Appellant would claim the Denied ITCs relying on fake invoices or accommodation invoices from the Carousel Scheme Traders that the Appellant knew or ought to have known were sham documents;

12.68. the Appellant would distribute to the Carousel Scheme Traders, proceeds from the net tax refunds in order for all participants in the scheme to profit;

12.69. the Appellant would pay the Carousel Scheme Traders in cash/cheque or in pure gold;

The Carousel Scheme Traders' roles

- 12.70. the Carousel Scheme Traders would, themselves or through other entities, create a paper trail of sham documents including fake invoices or accommodation invoices to give the appearance they supplied the Appellant with scrap gold;
- 12.71. the Carousel Scheme Traders did not supply the Appellant with any scrap gold;
- 12.72. the only gold that was exchanged between the Appellant and the Carousel Scheme Traders was pure gold as payment for participation in the scheme from the Appellant, or debased pure gold;
- 12.73. the debased pure gold was created by the Carousel Scheme Traders from the pure gold provided by the Appellant;

Sham Documents and Accommodation Invoices

- 12.74. the invoices provided by the Appellant from the Carousel Scheme Traders are fake invoices or alternatively, accommodation invoices;
- 12.75. all documents provided by the Appellant to the Minister in support of the Denied ITCs are sham documents;
- 12.76. the invoices and all other documents purporting to show the Appellant received supplies of scrap gold from the Carousel Scheme Traders were created and provided to the Minister for the sole purpose of advancing the Carousel Scheme by:

- 12.76.1. deceiving the Minister into the existence of transactions involving scrap gold that did not exist;
- 12.76.2. allowing the Appellant to falsely claim ITCs it was not entitled to; and
- 12.76.3. allowing the Appellant to claim net tax refunds in respect of ITCs it was not entitled to, which could be shared with the Carousel Scheme Traders;

Facts consistent with the existence of the Carousel Scheme

*ITC claim trends*

- 12.77. during the Reporting Periods, the Appellant's claimed ITCs increased significantly, including increases of 11% in 2014, 69% in 2015, and 47% in 2018;
- 12.78. after being informed that it was under audit, the Appellant's claimed ITCs dropped significantly in 2019, by approximately 48% to near 2013 levels;
- 12.79. during the 36 reporting periods preceding the audit's commencement, the Appellant's monthly sales averaged \$8,700,000;
- 12.80. during the 36 reporting periods preceding the audit's commencement, the Appellant's net tax refund averaged \$329,000 per month;
- 12.81. during the 12 reporting periods after the audit's commencement, the Appellant's net tax refund averaged \$25,000 per month;
- 12.82. the reason for the above trends was the Appellant's participation in the Carousel Scheme;

12.83. the Appellant's decreased its activities in the Carousel Scheme once it knew it was under audit by the CRA;

12.83.1. at and immediately after the time the Appellant was under audit, the price of gold increased to a high for the year;

12.83.2. the Appellant's only reduction in transactions related to the Carousel Scheme and involved the Carousel Scheme Traders;

12.83.3. none of the Appellant's purported large scrap gold sellers went to any of the Appellant's competitors;

*Withholding of amounts equal to the tax payable*

12.84. when the Appellant became aware that it was under audit, it began to hold back payments to its purported suppliers in amounts equal to the tax invoiced by the purported suppliers;

12.84.1. the Appellant continued to pay all amounts, including the invoiced tax, to its legitimate suppliers of scrap gold;

12.84.2. the Appellant only held back amounts equal to the amount invoiced as tax in respect of the Carousel Scheme Traders;

*Ending of relationship with the Carousel Scheme Traders*

12.85. when the Appellant became aware it was under audit, it ceased its involvement with the Carousel Scheme Traders it was dealing with at that time;

12.86. the Appellant continued the Carousel Scheme with new traders, namely 2337980, Naz and KTI after it ceased dealing with the previous ones;

12.87. the Appellant's legitimate scrap gold trading activities did not slow after it became aware of the audit;

*Purity and composition of the debased gold*

12.88. the supply of legitimate scrap gold typically comes from unwanted jewellery;

12.89. gold in jewellery in North America is typically 10 karat to 18 karat, with 14 karat being most common;

12.90. 14 karat gold is approximately 58% gold;

12.91. scrap gold should average around 58% gold;

12.92. scrap gold in excess of the average 58% is indicative of gold being sourced from somewhere other than unwanted jewellery, such as debased pure gold;

12.93. the Appellant's purported scrap gold averaged over 61%;

12.94. the purported scrap gold Carousel Scheme Traders included multiple traders whose purity greatly exceeded 58%;

12.95. gold in jewellery is typically alloyed with other precious metals, such as silver and platinum;

12.96. when gold is debased, it is typically debased with inexpensive metals such as copper;

12.97. the purported scrap gold acquired by the Appellant from the Carousel Scheme Traders had negligible amounts of other precious metals but significant amounts of copper;

12.98. the scrap gold supplied to the Appellant from its legitimate suppliers contained other precious metals and did not contain significant amounts of copper;

*Appellant received gold in gold bar mass increments*

12.99. consumer scrap gold is not typically provided in pieces of even 100 gram masses;

12.100. gold bars are available for acquisition in 100 gram increments;

12.101. scrap gold made from consumer products rarely reaches total masses of 100 gram increments;

12.102. debased gold made from debasing a number of 100 gram mass gold bars will have a gold composition equal to 100 gram mass increments;

12.103. the purported scrap gold acquired from the Carousel Scheme Traders often came in 100 gram increments, of note:

12.103.1. G&S provided 100 gram increments in 80% of transactions;

12.103.2. Alvin provided 100 gram increments in 37% of transactions;

12.103.3. JK provided 100 gram increments in 90% of transactions;

12.103.4. 1994930 provided 100 gram increments in 93% of transactions;

12.103.5. 2593837 provided 100 gram increments in 42% of transactions;

12.103.6. KTI provided 100 gram increments in 40% of transactions; and

12.103.7. 2466778 provided 100 gram increments in 30% of transactions;

*Abnormally high volumes of gold*

12.104. the Carousel Scheme Traders distributed abnormally high volumes of gold;

12.105. many of the Carousel Scheme Traders purported to supply the Appellant in excess of 1 kg of scrap gold per week despite:

12.105.1. having limited or no office space;

12.105.2. having limited or no internet or advertising presence; and

12.105.3. having limited or no previous experience, background or reputation in the gold industry;

*Involvement in other carousel schemes*

12.106. many of the Carousel Scheme Traders were involved in prior carousel schemes, or were linked to persons known to be involved in carousel schemes involving debased gold;

**Prior Audit History**

12.107. the Appellant was previously audited for income tax for the period January 1, 1998 to December 31, 2003;

12.108. the Appellant was previously audited for the reporting periods covering January 2007 to January 2010 as a factual audit;

12.108.1. as a result of this audit, some ITCs were denied;

12.108.2. this audit did not investigate the veracity of the Appellant's supporting documentation or audit the Appellant for participation in any carousel scheme;

12.109. the Appellant was previously audited for the reporting periods covering January 2011 to August 2011;

12.109.1. this audit focused on the Appellant's sales and not its ITC claims;  
and

12.109.2. as a result of this audit, adjustments were made due to the  
Appellant not collecting tax when it exchanged pure gold for  
scrap gold; and

12.110. the Appellant was previously audited for the June 2015 reporting period,  
which resulted in a major adjustment due to a timing issue.

**Reassessment pursuant to s. 298(4)(a) & (b) of the Act**

13. In determining that the Appellant made a misrepresentation attributable to carelessness, neglect, or wilful default or committed fraud in the filing of its returns for the Reporting Periods, such that the Minister was entitled to reassess the Appellant pursuant to s. 298(4)(a) & (b) of the *Act* for the reporting periods set out in Schedule B to this Reply, the Minister relied on the following facts:

13.1. the assumptions pleaded in paragraph 12 above;

13.2. the Appellant reported total revenue of \$77,520,485 in 2013, \$72,930,001 in 2014, \$82,189,255 in 2015, \$101,889,982 in 2016, \$101,712,240 in 2017, \$129,402,649 in 2018, and \$76,314,719 in 2019;

13.3. the Appellant has prepared and filed monthly returns since May 1997;

13.4. during the periods under Appeal, the Appellant was a net refund filer;

13.5. the ITCs claimed for transactions with Carousel Scheme Traders during the Reporting Periods were not less than the amounts detailed in Schedule A;

- 13.6. the Appellant claimed ITCs it was not entitled to (i.e. the Denied ITCs) in the amount of at least \$15,658,841.56 during the Reporting Periods in relation to transactions occurring in furtherance of the Carousel Scheme;
- 13.7. the Appellant claimed a total of \$26,295,648 in ITCs during the Reporting Periods;
- 13.8. the Denied ITCs are material as they constitute approximately 60% of the ITCs claimed and aggregate more than \$15,000,000;
- 13.9. the Appellant materially increased its claimed ITCs between 2013 and 2018 at an average of 28% per year;
- 13.10. once the Appellant became aware it was under audit in 2019, its ITC claims fell by 53%;
- 13.11. the Appellant was aware of the increase in its ITC and refund claims during the Reporting Periods;
- 13.12. the Appellant knew or ought to have known that it was not entitled to the Denied ITCs;
- 13.13. the Appellant was aware of the Carousel Scheme during the Reporting Periods;
- 13.14. the Appellant did not question the Carousel Scheme;
- 13.15. the Appellant was a willing participant in the Carousel Scheme;
- 13.16. the Appellant continued to do business with the Carousel Scheme Traders until it was notified it was under audit;
- 13.17. although the Appellant learned that 2287429, the Appellant's largest supplier prior to April 2017, was part of the Carousel Scheme, the Appellant

started business relationships with entities it knew or ought to have known were controlled by the same persons as 2287429, or were related to 2287429;

13.18. the Appellant knew, or ought to have known that most of its largest suppliers provided gold with purity levels that exceeded the expected purity level for the scrap gold market;

13.19. the Appellant's sales decreased by 36%, in the year the Appellant became aware it was under audit;

13.19.1. the decrease of 36% in sales was due to a reduction in purchases from the Carousel Scheme Traders;

13.20. at least 99.35% of the amounts paid as or on account of tax by the Appellant to the Carousel Scheme Traders was not remitted as net tax by the Carousel Scheme Traders;

13.21. the Appellant knowingly distributed amounts from its net tax refunds to the Carousel Scheme Traders;

13.22. the Appellant often paid the Carousel Scheme Traders in pure gold;

13.23. the Appellant knew or should have known of its obligation to file complete and correct returns;

13.24. the Appellant was sufficiently knowledgeable of tax matters to file its returns and knowledgeable of the degree of care required for these returns;

13.25. the Appellant hired a bookkeeper to maintain its books and records, prepare monthly reports and file its GST/HST returns;

- 13.26. the Appellant hired a professional accountant from an external accounting firm to prepare its income tax returns;
- 13.27. the Appellant's bookkeeper and accountant were available if the Appellant required advice;
- 13.28. the Appellant's bookkeeper and accountant prepared the Appellant's returns based on information provided by the Appellant;
- 13.29. the Appellant did not provide complete information to their bookkeeper or accountant;
- 13.30. the Appellant had been previously audited twice for prior reporting periods, namely for periods between January 1, 2007 and January 31, 2010, and periods between January 1, 2011 and August 31, 2011;
- 13.31. during the Reporting Periods, the Appellant filed its returns electronically, and certified that they were correct and accurate through its authorized representative;
- 13.32. the Appellant did not perform the due diligence operations required by Financial Transactions and Reports Analysis Centre of Canada ("**FinTrac**"), did not initiate suspicious activities reporting or maintain detailed know your client ("**KYC**") files;
- 13.33. the Appellant's failure to follow the obligations required by FinTrac, including keeping detailed KYC files, shows a pattern of neglect, carelessness or wilful disregard towards inquiry into suspicious or questionable suppliers;

- 13.34. the Appellant knew or ought to have known of the requirement to keep proper documentation to support its ITCs claimed;
- 13.35. the Appellant made misrepresentations in its returns filed for the Reporting Periods by claiming ITCs to which it was not entitled;
- 13.36. the Appellant's misrepresentations in its returns filed for the Reporting Periods were attributable to the Appellant's neglect, carelessness or wilful default;

**The Appellant's director had knowledge of the Carousel Scheme**

- 13.37. as director of the Appellant, EA was personally aware of the Carousel Scheme and participated or was complicit in the Carousel Scheme;
- 13.38. EA caused the Appellant to participate in and be complicit in the Carousel Scheme;
- 13.39. EA is highly knowledgeable and has extensive experience in the gold industry;
- 13.40. EA is a founder and sole shareholder of the Appellant;
- 13.41. EA has been a director of the Appellant since 1997;
- 13.42. EA was involved in the day-to-day business operations of the Appellant since 1997;
- 13.43. EA was aware of transactions of the Appellant;
- 13.44. EA is also the owner and sole director of 2534899 Ontario Inc.;
- 13.45. EA is aware that 2534899 Ontario Inc. provided offices to 1994930 Ontario Inc. and JK Jewellery, through lease agreements for premises located at 221 Victoria Street, Toronto, ON;

- 13.46. EA was aware that 1994930 Ontario Inc. and JK Jewellery were two of the Appellant's largest suppliers after the Appellant ceased working with 2287429, new entrants in the scrap gold industry and participants in the Carousel Scheme;
- 13.47. EA is aware that 2287429 Ontario Inc., the Appellant's former largest supplier involved in the Carousel Scheme, was owned by Ohannes Khatchirian, who is the brother of the owner of JK Jewellery, Johnny Khatchirian;
- 13.48. EA did not take steps to mitigate the Carousel Scheme and supported it;
- 13.49. EA had access to all business records of the Appellant;
- 13.50. EA reviewed, approved and filed the Appellant's returns;
- 13.51. EA was aware of the increase in the magnitude of tax refunds that the Appellant claimed during the Reporting Periods, in contrast to prior years;  
and
- 13.52. EA did not make inquiries into the sudden increase in ITCs claimed and net tax refunds during the Reporting Periods.

**Liability for penalties pursuant to s. 285 of the Act**

14. In determining that the Appellant was liable to a penalty under s. 285 of the *Act* in relation to the Reporting Periods, the Minister relied on the following facts:

**False statements and circumstances relating to the Denied ITCs**

- 14.1. the facts and assumptions pleaded in paragraphs 12 – 13 above;

- 14.2. the Appellant's failure to follow the obligations required by FinTrac, including keeping detailed KYC files, shows a pattern of knowing, wilfully blind or grossly negligent disregard towards inquiry into suspicious or questionable suppliers;
- 14.3. the Appellant, knowingly, or under circumstances amounting to gross negligence, made or participated in, assented to or acquiesced in the making of false statements in its returns filed for the Reporting Periods in that it falsely reported ITCs of \$15,658,841.56 to which it was not entitled in computing and reporting its net tax for those Reporting Periods;

**Wilful blindness to the Carousel Scheme**

- 14.4. from 2013 to 2018, the Appellant's:
  - a) reported sales and cost of goods sold increased by 66%;
  - b) ITC claims increased by 143%;
  - c) net tax refunded increased by 148%.
- 14.5. between 2013 and 2018, there were no favourable market conditions that could have supported the increases pleaded in subparagraph 14.4;
- 14.6. the volume of transactions in the gold recycling market is strongly tied to the price of gold;
- 14.7. there were no significant changes in gold prices from 2013 to 2018 that could account for the Appellant's increased sales and claimed ITCs;
- 14.8. the Appellant knew, ought to have known, or was grossly negligent in not knowing that the explanations it offered to justify the increases pleaded in subparagraph 14.4 were untruthful;

- 14.9. the Appellant knew, ought to have known or was grossly negligent in not knowing that the true reason for the increases pleaded in subparagraph 14.4 was its participation in the Carousel Scheme;
- 14.10. the Appellant and its director should have made inquiries regarding the substantial increases in the net tax refunds being claimed, but chose not to or were grossly negligent in not making inquiries;

### **Unremitted Tax**

- 14.1. the Appellant failed to include tax invoiced amounting to \$36,286.08 (the “**Unremitted Tax**”) in its accounting records and returns for the Period ending June 30, 2019;
- 14.2. the Unremitted Tax was invoiced to suppliers and did not result from complex tax matters;
- 14.3. the Appellant ought to have known the volume of sales, revenue and tax generated by its operations during Reporting Periods;
- 14.4. the Appellant was aware of the requirement to report all of its sales and amounts collected or collectible as or on account of tax when filing its returns;
- 14.5. the Appellant ought to have known that the tax generated by its operations was not properly reported on its returns;
- 14.6. the Appellant made misrepresentations in its returns filed for the reporting period ending June 30, 2019 by underreporting tax in the total amount of \$36,286.08; and

14.7. the Appellant's misrepresentations were attributable to the Appellant's neglect, carelessness or wilful default.

**B. ISSUES TO BE DECIDED**

15. The issues to be decided are whether:

15.1. the Minister was entitled to reassess the Appellant pursuant to s. 298(4)(a) & (b) of the *Act*;

15.2. the Appellant was a participant in the Carousel Scheme such that it is not entitled to the Denied ITCs during the Reporting Periods, due to:

15.2.1. the Appellant not acquiring the supplies in respect of which the Denied ITCs are claimed for consumption, use, or supply in the course of commercial activity; and

15.2.2. the Appellant's failure to obtain the evidence required by s. 169(4) of the *Act* prior to claiming the Denied ITCs;

15.3. whether the Appellant was entitled to any rebate in relation to the Denied ITCs; and

15.4. whether the Appellant was liable for penalties pursuant s. 285 of the *Act* due to the Appellant knowingly or in circumstances amounting to gross negligence making false statements on its returns for the Reporting Periods by claiming entitlement to the Denied ITCs.

**C. STATUTORY PROVISIONS RELIED ON**

16. The AGC relies, *inter alia*, on the *Act*, sections 225, 228, 261, 285 and 286, and subsections 123(1), 169(1), 169(4), 263(b), 296(1), 296(2.1) and 298(6.1) of the

*Act*; and sections 2 and 3 of the *Input Tax Credit Information (GST/HST) Regulations*, SOR/91-45 (the “**Regulations**”).

**D. GROUNDS RELIED ON AND RELIEF SOUGHT**

**Assessment pursuant s. 298(4)(a) & (b) of the Act**

17. The Appellant knowingly participated in the Carousel Scheme. In the alternative, the Appellant was wilfully blind to the existence of the Carousel Scheme, or was careless or neglectful in not knowing of the existence of the Carousel Scheme.
18. The Appellant made a misrepresentation on each of its returns for the Reporting Periods by claiming entitlement to the Denied ITCs (the “**Misrepresentations**”). As set out below, the Appellant was not entitled to the Denied ITCs.
19. Due to the Appellant’s knowledge of, wilful blindness to, or alternatively carelessness or neglect in not knowing of the Carousel Scheme, the Misrepresentations were made knowingly by the Appellant, while the Appellant was wilfully blind to the fact that the Misrepresentations were untrue, or alternatively the Misrepresentations were attributable to the Appellant’s carelessness or neglect. Accordingly, the Minister was entitled to reassess the Appellant pursuant to s. 298(4)(a) of the *Act* in respect of the Reporting Periods ending prior to February 2, 2019.
20. Alternatively, the Misrepresentations were made in the course of and in furtherance of the Carousel Scheme for the purposes of unjustly enriching the Appellant and the Carousel Scheme Traders in the aggregate amount of the Denied ITCs. As such

the Minister was entitled to reassess the Appellant pursuant to s. 298(4)(b)(i) of the *Act* in respect of the Reporting Periods ending prior to February 2, 2019.

**The Appellant is not entitled to ITCs in respect of the Carousel Scheme**

21. The Appellant was a participant in the Carousel Scheme. The Denied ITCs were in respect of property received in furtherance of and in respect of the Carousel Scheme. As such the Appellant was not entitled to ITCs pursuant to s. 169(1) of the *Act*.

**The Denied ITCs do not relate to property acquired for consumption, use, or supply in the course of commercial activity**

22. In order to claim an ITC, the property in respect of which the ITC is claimed must be for consumption, use, or supply in the course of commercial activity. The Appellant did not acquire the property in respect of the Denied ITCs for consumption, use, or supply in the course of commercial activity as required by s. 169(1) of the *Act*. Instead, the property was acquired for the purpose of the Carousel Scheme, the purpose and intent of which was to deceive the Minister into paying claimed ITCs the Appellant was not entitled to.

23. The definition of commercial activity in s. 123(1) does not include activities in which the parties' intent and purpose was to deceive the Minister into paying claimed ITCs the Appellant was not entitled to. Accordingly, while the Appellant acquired impure gold (i.e. the debased pure gold) from the Carousel Scheme Traders and was thus liable to pay a tax pursuant to s. 165(1) of the *Act*, it did so

outside of its commercial activity and was thus not entitled to claim ITCs pursuant to s. 169(1) of the *Act*.

**The Appellant failed to comply with s. 169(4) of the *Act* in respect of the Denied ITCs**

24. Additionally, in respect of the Denied ITCs, the Appellant failed to obtain the required sufficient evidence that would enable the amount of the Denied ITCs to be determined, including the information prescribed by the *Regulations*, as required by s. 169(4) of the *Act*.
25. All of the documents that the Appellant alleges to have obtained are sham documents or accommodation invoices created in furtherance of the Carousel Scheme. These documents were created, obtained by the Appellant and provided to the Minister for the intent of deceiving the Minister and hiding the existence of the Carousel Scheme. Being sham documents or accommodation invoices, these documents cannot be relied upon to justify the claim for the Denied ITCs.

**The Appellant is not entitled to a rebate in respect of the Carousel Scheme**

26. The Appellant was a participant in the Carousel Scheme. The invoices purporting to show that the Appellant paid amounts to the Carousel Scheme Traders as or on account of tax were sham documents. As such any amounts paid to the Carousel Scheme Traders, that the Appellant alleges were as or on account of tax, or were taken into account as tax, were not paid as or on account of tax and were not taken into account as tax. Instead, these payments were always made as furtherance of the Carousel Scheme.

27. The Appellant neither paid any amounts to the Carousel Scheme Traders as or on account of tax, nor were these payments amounts that were taken into as account of tax. As such, the Appellant was not entitled to any rebate pursuant to s. 261 of the *Act*. Therefore, the Minister was not required to consider the availability of this rebate when assessing the Appellant's net tax for the Reporting Periods, pursuant s. 296(2.1) of the *Act*.
28. Alternatively, the Appellant's own negligence, carelessness or inattention caused the Appellant to pay the amounts to the Carousel Scheme Traders. Therefore, the Appellant is not entitled to the rebate pursuant s. 261 of the *Act*. Accordingly, the Minister correctly determined no rebate was required to be considered when assessing the Appellant's net tax for the Reporting Periods, pursuant to s. 296(2.1) of the *Act*.

**The Appellant is liable for penalties in respect of the Carousel Scheme**

29. The Appellant is liable for penalties pursuant to s. 285 of the *Act* on the basis that the Appellant knowingly or in circumstances amounting to gross negligence made false statements on its returns by claiming the Denied ITCs.
30. The Misrepresentations were false statements in the Appellant's returns for the Reporting Periods stating that the Appellant was entitled to ITCs that it had no entitlement to in the aggregate amount of \$15,658,841.56.
31. The Misrepresentations were made in the course of the Appellant's knowing participation in the Carousel Scheme. As the Appellant knew that the purpose of

claiming the Denied ITCs was furtherance of the Carousel Scheme and not any commercial activity, the Appellant knew that it was not entitled to the Denied ITCs and thus knew that the Misrepresentations were a false statement. Accordingly, the penalties assessed pursuant to s. 285 of the *Act* are justified.

32. In the alternative, if the Misrepresentations were not made knowingly, the penalties assessed pursuant to s. 285 of the *Act* are justified as the Appellant was wilfully blind to the fact that it was not entitled to the Denied ITCs or was grossly negligent in not so knowing that it was not entitled to the Denied ITCs.
33. Additionally, the Appellant was liable for a penalty pursuant to s. 285 of the *Act* in respect of GST/HST in the amount of \$36,286.08 invoiced and collected but not remitted during the reporting period ending June 30, 2019, on the basis that the Appellant knowingly failed to include this amount in its net tax for that period, or was grossly negligent in failing to do so.
34. The Respondent requests that the appeal be dismissed, with costs.

**DATED** at the City of Ottawa, the Province of Ontario, this 27<sup>st</sup> day of May, 2026.



**ATTORNEY GENERAL OF CANADA**

NCR – Tax Litigation Section  
Justice Canada  
99 Bank Street, 11th Floor  
Ottawa, ON K1A 0H8  
F: 613-941-2293

**Per: Tanis Halpape  
Dan Daniels  
Dennis Do  
Helli Raptis**

613-979-8851  
343-548-7268  
343-550-1084

[tanis.halpape@justice.gc.ca](mailto:tanis.halpape@justice.gc.ca)  
[dan.daniels@justice.gc.ca](mailto:dan.daniels@justice.gc.ca)  
[dennis.do@justice.gc.ca](mailto:dennis.do@justice.gc.ca)  
[helli.raptis@justice.gc.ca](mailto:helli.raptis@justice.gc.ca)

Counsel for the Respondent

**TO:** The Registrar  
Tax Court of Canada  
30 McGill Street  
Montreal, Quebec  
H2Y 3Z7

**AND TO:** Alepin Gauthier Avocats Inc.  
3080, boul. Le Carrefour  
Bureau 400  
Laval, Québec H7T 2R5  
Fax: 450-681-1476

Per: Louis Tassé  
Tel: 450-681-3080 ext. 2365  
Email: [l.tasse@alepin.com](mailto:l.tasse@alepin.com)  
Counsel for the Appellant

**SCHEDULE A**

<b>Reporting Period Ending</b>	<b>Denied ITCs</b>	<b>s. 285 Penalty Assessed</b>
2013-04-30	\$ 1,276.19	\$ 319.05
2013-05-31	\$ 35,663.89	\$ 8,915.97
2013-06-30	\$ 59,299.78	\$ 14,824.95
2013-07-31	\$ 61,988.71	\$ 15,497.18
2013-08-31	\$ 64,516.92	\$ 16,129.23
2013-09-30	\$ 84,696.68	\$ 21,174.17
2013-10-31	\$ 137,932.08	\$ 34,483.02
2013-11-30	\$ 151,247.83	\$ 37,811.96
2013-12-31	\$ 170,477.41	\$ 42,619.35
2014-01-31	\$ 134,834.14	\$ 33,708.54
2014-02-28	\$ 140,627.36	\$ 35,156.84
2014-03-31	\$ 131,372.14	\$ 32,843.04
2014-04-30	\$ 268,234.23	\$ 67,058.56
2014-05-31	\$ 312,955.77	\$ 78,238.94
2014-06-30	\$ 324,856.69	\$ 81,214.17
2014-07-31	\$ 24,852.29	\$ 6,213.07
2014-08-31	\$ -	\$ -
2014-09-30	\$ 20,486.00	\$ 5,121.50
2014-10-31	\$ -	\$ -
2014-11-30	\$ 11,154.94	\$ 2,788.74
2014-12-31	\$ 10,661.17	\$ 42,644.68
2015-01-31	\$ 101,027.04	\$ 25,256.76
2015-02-28	\$ 95,397.75	\$ 23,849.44
2015-03-31	\$ 138,469.71	\$ 34,617.43
2015-04-30	\$ 140,799.86	\$ 35,199.97
2015-05-31	\$ 156,969.06	\$ 39,242.27
2015-06-30	\$ 142,839.85	\$ 35,709.96
2015-07-31	\$ 33,572.67	\$ 8,393.17
2015-08-31	\$ -	\$ -
2015-09-30	\$ 184,476.60	\$ 46,119.15
2015-10-31	\$ 205,375.46	\$ 51,343.87
2015-11-30	\$ 155,363.18	\$ 38,840.80
2015-12-31	\$ 123,603.14	\$ 30,900.79
2016-01-31	\$ 161,683.12	\$ 40,420.78
2016-02-29	\$ 166,071.24	\$ 41,517.81
2016-03-31	\$ 221,112.58	\$ 55,278.15

2016-04-30	\$ 168,158.79	\$ 42,039.70
2016-05-31	\$ 299,548.24	\$ 74,887.06
2016-06-30	\$ 250,816.73	\$ 62,704.18
2016-07-31	\$ 262,760.90	\$ 65,690.23
2016-08-31	\$ 367,804.42	\$ 91,951.11
2016-09-30	\$ 388,203.74	\$ 97,050.94
2016-10-31	\$ 278,166.78	\$ 69,541.70
2016-11-30	\$ 315,015.04	\$ 78,753.76
2016-12-31	\$ 238,654.10	\$ 59,663.53
2017-01-31	\$ 447,806.51	\$ 111,951.63
2017-02-28	\$ 375,140.12	\$ 93,785.03
2017-03-31	\$ 392,167.07	\$ 98,041.77
2017-04-30	\$ 158,210.25	\$ 39,552.56
2017-05-31	\$ 229,043.91	\$ 57,260.98
2017-06-30	\$ 175,262.54	\$ 43,815.64
2017-07-31	\$ 155,306.78	\$ 38,826.70
2017-08-31	\$ 331,940.16	\$ 82,985.04
2017-09-30	\$ 85,659.71	\$ 21,414.93
2017-10-31	\$ 101,314.99	\$ 25,328.75
2017-11-30	\$ 160,887.89	\$ 40,221.97
2017-12-31	\$ 199,493.50	\$ 49,873.38
2018-01-31	\$ 327,125.08	\$ 81,781.27
2018-02-28	\$ 302,522.81	\$ 75,630.70
2018-03-31	\$ 302,261.12	\$ 75,565.28
2018-04-30	\$ 298,743.31	\$ 74,685.83
2018-05-31	\$ 427,919.22	\$ 106,979.81
2018-06-30	\$ 428,478.23	\$ 107,119.56
2018-07-31	\$ 487,975.78	\$ 121,993.95
2018-08-31	\$ 347,548.63	\$ 86,887.16
2018-09-30	\$ 307,121.07	\$ 76,780.27
2018-10-31	\$ 408,456.18	\$ 102,114.05
2018-11-30	\$ 344,170.71	\$ 86,042.68
2018-12-30	\$ 452,526.82	\$ 113,131.71
2019-01-31	\$ 181,521.62	\$ 45,380.41
2019-02-28	\$ 199,410.02	\$ 49,852.51
2019-03-31	\$ 206,586.55	\$ 51,646.64
2019-04-30	\$ 319,026.27	\$ 79,756.57
2019-05-31	\$ 357,891.45	\$ 89,472.86
2019-06-30	\$ 238,576.25	\$ 50,573.29

2019-07-31	\$ 93,183.36	\$ 23,295.84
2019-08-31	\$ 40,555.92	\$ 10,138.98
<b>Total:</b>	<b>\$ 15,626,858.05</b>	<b>\$ 3,937,623.27</b>

### SCHEDULE B

<b>Carousel Scheme Trader</b>	<b>Period of Participation</b>	<b>Appellant's Denied ITCs</b>
2287429	2013-04-30 to 2017-03-28	\$6,371,718.81
G&S	2016-09-15 to 2018-08-07	\$2,129,324.00
Alvin	2017-01-24 to 2019-06-25	\$1,278,436.91
JK	2018-01-09 to 2018-12-26	\$1,213,833.03
1994930	2018-05-22 to 2018-12-28	\$961,884.91
2337980	2018-07-10 to 2019-07-08	\$850,348.02
Naz	2017-04-19 to 2019-07-22	\$775,919.94
Sri	2016-01-11 to 2016-12-29	\$647,320.25
Green Leaf	2018-01-11 to 2019-05-02	\$498,907.38
1995891	2019-01-09 to 2019-06-18	\$283,177.19
KTI	2018-12-10 to 2019-08-22	\$199,948.25
2466778	2019-03-27 to 2019-06-19	\$137,915.88
Krish	2017-01-17 to 2017-01-24	\$69,349.92
1995949	2019-05-27 to 2019-06-18	\$59,721.78
5010433	2019-04-06 to 2019-05-27	\$59,522.89
Roy	2018-12-6 to 2018-12-10	\$33,324.16
A&Z	2019-05-29 to 2019-08-09	\$31,824.47
Cash for Gold	2019-06-11	\$24,827.39
Gold City	2019-05-24 to 2019-07-24	\$13,657.79
GTA	2019-06-10	\$13,031.92
Suhaag	2019-05-21 to 2019-06-12	\$4,846.67
	<b>Total:</b>	<b>\$15,658,841.56</b>



Cour canadienne de l'impôt

[Home](#) > [File a Document](#) > File Documents

## Confirmation

Thank you for using the Tax Court of Canada's Online Filing System.

An electronic copy of your document(s) has(have) been received at the Tax Court of Canada.

Your Reference Number is: **WEB958955**

## Session Details

**Submitted on:** May 27, 2026 3:27:12 EDT PM

**Company's Name (if appellant):** 999 Gold Depot (Canada) Limited

**Appeal Number:** 2026-349(GST)G

Type of Document	Document Name
Reply - Notice of Appeal	Reply to the Notice of Appeal 999 Gold Depot (Canada) Limited v HMK 2026-349(GST)G.pdf
Reply - Consent to Time Extension for Filing	999 Gold Depot (Canada) Limited v HMK - 2026-349(GST)G Extension to File Reply - AS FILED.pdf

Please save or print this page for your records.

Your comments are important to us. Please give us some [feedback](#) on the use of our Online Filing System.

[Close Session](#)

***THIS IS EXHIBIT "K" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL' followed by a stylized flourish, is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***



999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

## Notice details

Date **JAN 12 2024**

Contact name D. Platt (1213)

Telephone number (905) 960-6843

Toll free number

Account number 887455749RT0001

## Requirement to pay

This is a copy of a requirement to pay we sent to:  
Royal Bank of Canada (RTP)  
3rd Party Demands

You can still make a payment on your debt. For payment options, go to [canada.ca/payments](https://canada.ca/payments).

If you already paid your debt in full, please call the contact person to provide the details of your payment.

The following taxpayer(s) owe(s) **\$27,944,666.52** for the account 887455749RT0001.

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6  
Corporation number 1231144

This requirement to pay from the Minister of National Revenue requires you to send us any money you would otherwise pay to the taxpayer; but do not send more than \$27,944,666.52, at the rate of 100% of all payments. For requirements to pay, money includes amounts from any assets of the taxpayer that can be converted into cash.

You are required to pay under subsections 317(1), (2), and/or (6) of the Excise Tax Act, subsections 289(1), (2), and/or (4) of the Excise Act, 2001, subsections 75(1), (2), and/or (5) of the Air Travellers Security Charge Act, subsections 89(1), (2), and/or (4) of the Softwood Lumber Products Export Charge Act, 2006, subsections 153(1), (2) and/or (4) of the Greenhouse Gas Pollution Pricing Act, or subsection 142(1), (2) and/or (4) of the Select Luxury Items Tax Act.

### Money you owe or are paying to the taxpayer

You may owe money to the taxpayer now or you may have to pay the taxpayer later. Either way, you must send this money instead of paying the taxpayer.

1. If you owe money to the taxpayer now, you must send us this amount right away.
2. If you owe money to the taxpayer within the next year, you must send this amount to us as soon as this money becomes due.
3. If you owe money to the taxpayer within or after one year, such as interest, rent, salary or wages, dividends, annuities, or any other periodic payments, you must send this money to us as soon as it becomes due.

## Notice details

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

Date **12 JAN. 2024**

**4. Within the next 90 days, if you are:**

- a bank, a credit union, a trust company, or another similar person, and you loan or advance money to the taxpayer, make a payment for the taxpayer, or pay a negotiable instrument issued by the taxpayer, and you hold security for the amounts you loan or advance, you must send this money to us.
- a person, other than an institution, and you lend or advance money to or pay an amount for the taxpayer, and the taxpayer is, was, or will become your employee, or you engaged or will engage the taxpayer to provide services or property within this period of time, you must send this money to us.
- a corporation and will lend or advance money to or make a payment for the taxpayer and you are not dealing at arm's length with the taxpayer, you must send this money to us.

**Please make your payment payable to the Receiver General.**

### Your legal obligation

You are required to send this money to us even if you were planning to or have been directed to send money that would otherwise be payable to the taxpayer, to a creditor of the taxpayer, the taxpayer's representative, or to any other person.

### Your liability

If you do not pay the money that is required according to the terms of this requirement, you will become liable for the payment of this money.

### Keep records

Keep a copy of this requirement to pay for at least **one year**. Also keep a detailed record of all payments you send us for at least six years from the date of this requirement.

For more information regarding requirements to pay, go to [canada.ca/cra-requirement-to-pay](https://canada.ca/cra-requirement-to-pay).



Team Leader, Revenue Collections

**(TAXPAYER)**

***THIS IS EXHIBIT "L" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to read 'Erol Aksu', is centered on the page. The signature is written in a cursive style and is flanked by two vertical grey bars.

---

***A Commissioner Etc.***



999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

## Notice details

Date **JUL 09 2025**

Contact name T Foote (1215)

Telephone number (226) 385-6795

Toll free number

Account number 887455749RT0001

## Requirement to pay

This is a copy of a requirement to pay we sent to:  
Scotiabank (RTP)  
Operations & Corporate Services

You can still make a payment on your debt. For payment options, go to [canada.ca/payments](https://canada.ca/payments).

If you already paid your debt in full, please call the contact person to provide the details of your payment.

The following taxpayer(s) owe(s) **\$31,054,133.85** for the account 887455749RT0001.

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6  
Corporation Number: 1231144

This requirement to pay from the Minister of National Revenue requires you to send us any money you would otherwise pay to the taxpayer; but do not send more than \$31,054,133.85, at the rate of 100% of all payments. For requirements to pay, money includes amounts from any assets of the taxpayer that can be converted into cash.

You are required to pay under subsections 317(1), (2), and/or (6) of the Excise Tax Act, subsections 289(1), (2), and/or (4) of the Excise Act, 2001, subsections 75(1), (2), and/or (5) of the Air Travellers Security Charge Act, subsections 89(1), (2), and/or (4) of the Softwood Lumber Products Export Charge Act, 2006, subsections 153(1), (2) and/or (4) of the Greenhouse Gas Pollution Pricing Act, or subsection 142(1), (2) and/or (4) of the Select Luxury Items Tax Act.

### Money you owe or are paying to the taxpayer

You may owe money to the taxpayer now or you may have to pay the taxpayer later. Either way, you must send this money instead of paying the taxpayer.

1. If you owe money to the taxpayer now, you must send us this amount right away.
2. If you owe money to the taxpayer within the next year, you must send this amount to us as soon as this money becomes due.
3. If you owe money to the taxpayer within or after one year, such as interest, rent, salary or wages, dividends, annuities, or any other periodic payments, you must send this money to us as soon as it becomes due.

**Please make your payment payable to the Receiver General.**

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

## Notice details

Date

JUL 09 2025

### Your legal obligation

You are required to send this money to us even if you were planning to or have been directed to send money that would otherwise be payable to the taxpayer, to a creditor of the taxpayer, the taxpayer's representative, or to any other person.

### Your liability

If you do not pay the money that is required according to the terms of this requirement, you will become liable for the payment of this money.

### Keep records

Keep a copy of this requirement to pay for at least **one year**. Also keep a detailed record of all payments you send us for at least six years from the date of this requirement.

For more information regarding requirements to pay, go to [canada.ca/cra-requirement-to-pay](https://canada.ca/cra-requirement-to-pay).



Team Leader, Revenue Collections

(TAXPAYER)

***THIS IS EXHIBIT "M" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "AL AKSU", is centered between two vertical grey rectangular bars. The signature is written in a cursive, flowing style.

---

***A Commissioner Etc.***



Revenue Collections  
Sudbury ON P3A 5C1

October 23, 2025

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

Account Number  
88745 5749 RT0001

Dear Sir or Madam:

Subject: Legal warning about your HST/GST debt of  
\$31,807,932.93

Our records show that you still owe \$31,807,932.93. This amount is due immediately.

If you do not pay the full amount or respond to this letter within 14 days, we may take legal action against you without further notice. For example, we may garnish your income, garnish your bank account, seize and sell your assets, and use any other legal means to collect the amount you owe.

These are the ways you can pay:

- online or by phone using your Canadian financial institution's services
- online at [canada.ca/cra-my-payment](http://canada.ca/cra-my-payment)
- online by setting up a pre-authorized debit agreement at [canada.ca/cra-sign-in-services](http://canada.ca/cra-sign-in-services)
- in person at your Canadian financial institution. You will need a personalized remittance voucher
- in person at Canada Post for a fee. You will need a QR code

For more information or payment options, go to [canada.ca/payments](http://canada.ca/payments) or call 1-800-959-5525. If you are outside of North America, call 613-940-8497. We accept collect calls.

You can also mail your payment to:

Canada Revenue Agency  
PO Box 3800 STN A  
Sudbury ON P3A 0C3

.../2



National Sub-ledger/Ontario Regional  
Collection Centre  
1050 Notre Dame Ave  
P.O. Box 20000, Station A  
Sudbury ON P3A 5C1

Local: 226-385-6795  
Toll Free: 1-833-647-1913  
Fax: 833-647-1913  
Web site: [canada.ca/taxes](http://canada.ca/taxes)

If you mail your payment, write your full business number on your cheque or money order so we can process it correctly. Please make cheques and money orders payable to the Receiver General for Canada.

For more information about our collections policies, go to [canada.ca/cra-collections](http://canada.ca/cra-collections).

If you recently paid the amount you owe, we thank you and ask you to disregard this letter. However, if you paid more than 15 days ago, please call me at 1-855-210-0374.

Yours sincerely,

T. Foote (1215)  
Collections Officer

***THIS IS EXHIBIT "N" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL' followed by a stylized flourish, is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***



999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

## Notice details

Date **APR 22 2026**

Contact name T. Foote (1215)

Telephone number (226) 385-6795

Toll free number

Account number 887455749RT0001

## Requirement to pay

This is a copy of a requirement to pay we sent to:  
Canadian Imperial Bank  
of Commerce (CIBC) (RTP)

You can still make a payment on your debt. For payment options, go to [canada.ca/payments](https://canada.ca/payments).

If you already paid your debt in full, please call the contact person to provide the details of your payment.

The following taxpayer(s) owe(s) **\$31,822,645.36** for the account 887455749RT0001.

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6  
Corporation Number: 1231144

This requirement to pay from the Minister of National Revenue requires you to send us any money you would otherwise pay to the taxpayer; but do not send more than \$31,822,645.36, at the rate of 100% of all payments. For requirements to pay, money includes amounts from any assets of the taxpayer that can be converted into cash.

You are required to pay under subsections 317(1), (2), and/or (6) of the Excise Tax Act, subsections 289(1), (2), and/or (4) of the Excise Act, 2001, subsections 75(1), (2), and/or (5) of the Air Travellers Security Charge Act, subsections 89(1), (2), and/or (4) of the Softwood Lumber Products Export Charge Act, 2006, subsections 153(1), (2) and/or (4) of the Greenhouse Gas Pollution Pricing Act, subsections 142(1), (2) and/or (4) of the Select Luxury Items Tax Act, or subsections 73(1), (2), and/or (4) of the Underused Housing Tax Act.

## Money you owe or are paying to the taxpayer

You may owe money to the taxpayer now or you may have to pay the taxpayer later. Either way, you must send this money instead of paying the taxpayer.

1. If you owe money to the taxpayer now, you must send us this amount right away.
2. If you owe money to the taxpayer within the next year, you must send this amount to us as soon as this money becomes due.
3. If you owe money to the taxpayer within or after one year, such as interest, rent, salary or wages, dividends, annuities, or any other periodic payments, you must send this money to us as soon as it becomes due.

**Please make your payment payable to the Receiver General.**

999 GOLD DEPOT (CANADA) LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

## Notice details

Date **APR 22 2026**

### Your legal obligation

You are required to send this money to us even if you were planning to or have been directed to send money that would otherwise be payable to the taxpayer, to a creditor of the taxpayer, the taxpayer's representative, or to any other person.

### Your liability

If you do not pay the money that is required according to the terms of this requirement, you will become liable for the payment of this money.

### Keep records

Keep a copy of this requirement to pay for at least **one year**. Also keep a detailed record of all payments you send us for at least six years from the date of this requirement.

For more information regarding requirements to pay, go to [canada.ca/cra-requirement-to-pay](https://canada.ca/cra-requirement-to-pay).



Collections Officer

(TAXPAYER)

***THIS IS EXHIBIT "O" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL AKSU', is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***



Western Ontario TSO, Sudbury P3A5C1

**Date issued**  
**Account number**

May 5, 2026  
88745 5749 RT0001

CANADIAN IMPERIAL BANK  
OF COMMERCE (CIBC)  
7TH FLOOR  
595 BAY ST  
TORONTO ON M5G 2C2

Subject: Requirement to Pay  
Name: 999 Gold Depot (Canada) Limited  
Account number: 887455749RT0001

Dear Sir or Madam:

Effective **May 4, 2026**, we have cancelled the requirement to pay sent to you in the amount of **\$31,822,645.36**.

If you deducted or retained money as of the date you received the requirement to pay, up to and including **April 30, 2026**, the date of the cancellation, but you have not yet sent this amount to the Canada Revenue Agency, please send it to us now.

Cancelling the requirement to pay does not affect the rights of the Canada Revenue Agency under any of the acts it administers.

Thank you,

David Martin  
Team Leader

***THIS IS EXHIBIT "P" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "H. My", is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***

**From:** [Antoinette De Pinto](#) on behalf of [Harvey G. Chaiton](#)  
**To:** [Iman Abokor](#)  
**Cc:** [Harvey G. Chaiton](#)  
**Subject:** 999 Gold Depot (Canada) Limited  
**Date:** Tuesday, May 5, 2026 12:28:51 PM  
**Attachments:** [CIBC Withdrawal LETTER.pdf](#)

---

Good afternoon Iman,

Please find attached the withdrawal of RTP which we understand was sent by CRA to the bank branch. The account remains frozen. Can you please arrange to have the account unfrozen as the company needs to access funds to operate its business.

Thank you.

Harvey,

---

**Antoinette De Pinto** | Law Clerk/Assistant to Harvey Chaiton & Hugh McHenry  
**Chaitons LLP** | T: 416.218.1762

***THIS IS EXHIBIT "Q" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be 'AL' followed by a large, stylized flourish, is centered between two vertical grey rectangular bars.

---

***A Commissioner Etc.***



Canada Revenue  
Agency

Agence du revenu  
du Canada

Effective Date  
June 25, 2026

Account Number  
88745 5749 RT0001

Reference Number  
77676671

Period Covered  
2026-04-01 to 2026-04-30

999 GOLD DEPOT (CANADA)  
LIMITED  
901-27 QUEEN ST E  
TORONTO ON M5C 2M6

Dear 999 Gold Depot (Canada) Limited

Re: GST/HST Proposal letter

Please see the attached proposal letter and proposed statement of adjustments.

Yours sincerely

Brent Harris  
GST/HST Examiner  
Eastern Prairie TSO - Saskatoon  
340-3rd Avenue North  
Saskatoon SK S7K 0A8  
Phone number 306-491-3062  
Facsimile 833-545-2885

***THIS IS EXHIBIT "R" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "AL AKSU", is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***

999 Gold Depot (Canada) Limited  
Cash Flow Forecast  
April 30, 2026 - May 29, 2026

For the week ending, In CAD	Notes	Week 1	Week 2	Week 3	Week 4	Total
		07-May-26	14-May-26	21-May-26	29-May-26	
<b>Receipts</b>						
Operating receipts	1	1,615,143	900,000	900,000	900,000	4,315,143
HST collected	2	40,379	22,500	22,500	22,500	107,879
<b>Total receipts</b>		<b>1,655,522</b>	<b>922,500</b>	<b>922,500</b>	<b>922,500</b>	<b>4,423,022</b>
<b>Disbursements</b>						
Payroll		19,427	-	20,000	-	39,427
Materials	3	325,492	1,612,400	640,000	640,000	3,217,892
Rent		4,361				4,361
HST paid	2	11,059	26,448	10,890	30,390	78,788
Professional Fees	4	44,000	-	-	150,000	194,000
Other (Operating Expenses)	5	1,011	5,000	5,000	5,000	16,011
<b>Total disbursements</b>		<b>405,350</b>	<b>1,643,848</b>	<b>675,890</b>	<b>825,390</b>	<b>3,550,479</b>
<b>Net cash flow</b>		<b>1,250,171 -</b>	<b>721,348</b>	<b>246,610</b>	<b>97,110</b>	<b>872,543</b>
Opening cash balance	6	958,374	2,208,545	1,487,197	1,733,807	958,374
Net cash flow		1,250,171 -	721,348	246,610	97,110	872,543
<b>Ending cash balance</b>		<b>2,208,545</b>	<b>1,487,197</b>	<b>1,733,807</b>	<b>1,830,917</b>	<b>1,830,917</b>

**General Note 1:** Management of 999 Gold Depot Limited. ("999" or the "Company") has prepared this forecasted cash-flow statement (the "Cash Flow Forecast") based on probable and hypothetical assumptions detailed in Notes 1 to 6. The Cash Flow Forecast has been prepared solely for the purpose of supporting the Notice of Intention to Make a Proposal ("NOI") filed by the Company on April 30, 2026. As such, readers are cautioned that it may not be appropriate for their purposes. The Cash Flow Forecast of the Company is prepared in accordance with the provisions of the *Bankruptcy and Insolvency Act* and should be read in conjunction with the Trustee's Report on the Cash-flow Statement.

Dated at the City of Toronto in the Province of Ontario, this 8th day of May 2026.

999 Gold Depot (Canada) Limited  
Per:

KSV Restructuring Inc.  
Per:

Agop Aksu  
President

Noah Goldstein, CPA, CA, CIRP, LIT  
Managing Director

999 Gold Depot (Canada) Limited  
Notes to the Cash Flow Forecast  
April 30, 2026 - May 29, 2026

**Note 1:** Operating receipts represent sales of gold and other precious metals to retail customers and refinery clients. Sales are based on the prevailing market price, and Week 1 of the Cash Flow Forecast has a large sale of gold due to favorable market conditions. Sales for Weeks 2-5 are consistent with the prior month's sales.

**Note 2:** Purchases and sales of fine gold are exempt from HST. Certain sales require HST to be charged.

**Note 3:** Material costs represent costs of inventory for sale to retail customers. The Company had been accumulating inventory over the past two months and expects lower than average inventory purchases in the month of May.

**Note 4:** Professional fees represent fees for the Company's counsel, the Trustee and the Trustee's counsel.

**Note 5:** Operating expenses represent shipping, security and miscellaneous office costs.

**Note 6:** Opening cash as of May 1, 2026.

***THIS IS EXHIBIT "S" TO THE  
AFFIDAVIT OF EROL AKSU  
SWORN BEFORE ME THIS 7<sup>TH</sup>  
DAY OF JULY, 2026***

A handwritten signature in black ink, appearing to be "AL AKSU", is centered between two vertical grey rectangular bars. The signature is written in a cursive style.

---

***A Commissioner Etc.***

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

Court No.: 31-3367471  
Estate No.: 31-3367471

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF  
999 GOLD DEPOT (CANADA) LIMITED.**

**CONSENT OF THE PROPOSED MONITOR**

**ALIXPARTNERS RESTRUCTURING, INC.**, hereby consents to act as the court-appointed monitor of 999 Gold Depot (Canada) Limited (the “**Applicant**”) in respect of the Applicant’s proceedings pursuant to the *Companies’ Creditors Arrangement Act* (Canada), subject to the granting of an Initial Order substantially in the form included in the Applicant’s Application Record.

Dated as of July 7, 2026.

**ALIXPARTNERS RESTRUCTURING, INC.**

Per: 

\_\_\_\_\_  
Name: Noah Goldstein

Title: Managing Director

**TAB 3**

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF  
999 GOLD DEPOT (CANADA) LIMITED**

Applicant

**NOTICE OF APPLICATION**

**TO THE RESPONDENTS:**

**A LEGAL PROCEEDING HAS BEEN COMMENCED** by the Applicant. The claim made by the Applicant appears on the following page.

**THE PROPOSED METHOD OF HEARING:**

- In writing under subrule 37.12.1 (1) because it is (insert one of on consent, unopposed or made without notice);
- In writing as an opposed motion under subrule 37.12.1 (4);
- In person;
- By telephone conference;
- BY VIDEO CONFERENCE,**

before the Honourable Justice Steele of the Ontario Superior Court of Justice (Commercial List) on Monday, July 13, 2026 at 11:00 a.m., at the following Zoom Link:

<https://ca01web.zoom.us/j/67927063702?pwd=c1Z2eFN3NXB1N0xOK0lYSWtCL2ZBZz09#success>

**IF YOU WISH TO OPPOSE THIS APPLICATION**, to receive notice of any step in the application or to be served with any documents in the application, you or an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the Rules of Civil Procedure, serve it on the Applicant's lawyer or, where the Applicant does not have a lawyer, serve it on the Applicant, and file it, with proof of service, in this court office, and you or your lawyer must appear at the hearing.

**IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION**, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the Applicant's lawyer or, where the Applicant does not have a lawyer, serve it on the Applicant, and file it, with proof of service, in the court office where the application is to be heard as soon as possible, but at least four days before the hearing.

**IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO OPPOSE THIS APPLICATION BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.**

Date \_\_\_\_\_ Issued by \_\_\_\_\_  
Local Registrar

Address of 330 University Avenue  
court office: Toronto, Ontario M5G 1E6

TO: **THIS HONOURABLE COURT**

AND TO: **SERVICE LIST**

**THE APPLICANT MAKE THIS APPLICATION FOR<sup>1</sup>:**

1. An order (the “**Initial Order**”) under the *Companies’ Creditors Arrangement Act*, R.S.C. 1985 c. C-36, as amended (the “**CCAA**”), substantially in the form attached at Tab 4 of the Motion Record that, among other things:
  - (a) abridges and validates the time for service of the Notice of Motion, this Notice of Application and the Motion Record and dispenses with further service thereof;
  - (b) declares that 999 Gold Depot (Canada) Limited (the “**Applicant**” or the “**Company**”) is a “debtor company” to which the CCAA applies;
  - (c) authorizes and directs that the proposal proceedings commenced by the Applicant under Division I of Part III of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”), bearing Court File No. BK-26-03367471-0031 and Court/Estate No. 31-3367471 (the “**NOI Proceedings**”), be taken up and continued under the CCAA;
  - (d) appoints AlixPartners Restructuring, Inc., formerly KSV Restructuring Inc. (“**Alix**” or the “**Proposed Monitor**”), as monitor of the Applicant in the CCAA Proceedings (once appointed in such capacity, the “**Monitor**”);
  - (e) provides for a stay, until November 14, 2026 or such other date as the Court may order (the “**Stay Period**”), of all proceedings or enforcement processes in respect of the Applicant, the Directors and Officers of the Applicant, the Monitor, or

---

<sup>1</sup> Capitalized terms not otherwise defined have the meanings given to them in the Affidavit of Erol Aksu, sworn July 7, 2026.

affecting the Applicant's Business or Property (each as defined in the Initial Order), except with the written consent of the Applicant and the Monitor, or with leave of the Court, provided that the Tax Appeal (defined below) shall remain procedurally unaffected by the stay, but the stay shall be applicable to the enforcement of any order made in the Tax Appeal affecting the Monitor, the Business or the Property;

- (f) stays, during the Stay Period (as defined in the Initial Order), any enforcement process, procedure, right or mechanism in respect of the Tax Assessments (defined below) or any future tax assessment issued to the Applicant for the period prior to the NOI Filing Date (defined below), including any right of set-off by Canada Revenue Agency ("CRA") between Pre-Filing Tax Liabilities and Post-Filing Tax Assets (each as defined in the Initial Order), such that Post-Filing Tax Assets are to be processed and paid to the Applicant during the Stay Period as though no Pre-Filing Tax Liability existed;
- (g) authorizes the Applicant to remain in possession and control of its Business and Property, continue operating in the ordinary course, continue using its existing cash management system, and make the payments permitted by the Initial Order;
- (h) grants the Administration Charge and the Directors' Charge (each as defined in the Initial Order) over the Property; and

2. Such further and other relief as counsel may request and this Honourable Court deems just.

**THE GROUNDS FOR THE APPLICATION ARE:**

***Background***

1. The Applicant is an established, family-owned and operated precious metals business primarily engaged in the purchase of scrap precious metals, the refinement of those materials through third-party refiners located in Canada and the United States, and the sale of refined metals to customers, primarily investors and jewellers;
2. The Applicant was incorporated on April 3, 1997 under the *Business Corporations Act* (Ontario) and has its registered head office located at 27 Queen Street East, Suite 901, Toronto, Ontario;
3. Agop Aksu is the Applicant's sole director, Erol Aksu is the Applicant's sole shareholder, and the Applicant currently employs five individuals (including Erol Aksu);

#### ***Tax Dispute and CRA Enforcement Activity***

4. CRA issued notices of assessment dated March 2, 2023 (the "**Tax Assessments**") in respect of the Company's GST/HST reporting periods from April 1, 2013 to August 31, 2019 (the "**Reporting Period**") pursuant to which CRA disallowed input tax credits ("**ITCs**") in the total amount of \$15,695,124 and assessed gross negligence penalties under section 285 of the *Excise Tax Act*, together with related interest;
5. The Applicant disputes the Tax Assessments and filed a notice of objection to the Assessments on May 10, 2023, and a notice of appeal in the Tax Court of Canada dated February 9, 2026, bearing Court File No. 2026-349(GST)G (the "**Tax Appeal**");
6. The Crown has delivered a reply to the notice of appeal, and the Tax Appeal remains ongoing;

7. CRA has also not remitted GST/HST refunds, ITCs, credits and rebates otherwise payable to the Applicant, including refunds for periods outside the Reporting Period;
8. CRA has taken enforcement steps in respect of the amounts it alleges are owing by the Applicant, including Requirements to Pay issued to Royal Bank of Canada on January 12, 2024, Scotiabank on July 9, 2025, and Canadian Imperial Bank of Commerce (“CIBC”) on April 22, 2026;
9. On October 23, 2025, CRA sent a letter to the Company stating that CRA’s records indicated that the Company owed \$31,807,932.93 and advising that CRA could take legal action without further notice if the Company did not pay or respond;
10. CIBC maintained the Applicant’s sole operating bank account and, as a result of the April 2026 Requirement to Pay, the Applicant’s access to funds held at CIBC was frozen, which immediately disrupted the Applicant’s business operations, created an acute liquidity crisis, and precipitated the Applicant’s NOI filing;

### ***NOI Proceedings***

11. On April 30, 2026 (the “**NOI Filing Date**”), the Applicant filed a Notice of Intention to Make a Proposal pursuant to section 50.4 of the BIA and Alix was appointed as Proposal Trustee;
12. Following the NOI Filing Date, and following correspondence among the Applicant’s counsel, the Department of Justice and CIBC, CRA cancelled the April 2026 Requirement to Pay and the Applicant regained access to its CIBC operating account;

13. On May 28, 2026, the Honourable Justice Conway granted an order extending the time for the Applicant to file a proposal under the BIA to and including July 14, 2026;
14. On June 25, 2026, CRA issued correspondence advising, among other things, that it is auditing the Applicant's GST/HST return for the period from April 1, 2026 to April 30, 2026 as a result of the Applicant's NOI filing, and proposing to increase the Applicant's net tax payable for that period by \$169,419.27;

***Continuation Under the CCAA***

15. The Applicant seeks to have the NOI Proceedings continued under the CCAA pursuant to section 11.6 of the CCAA;
16. The Applicant has not filed a proposal under the BIA, and the continuation of the NOI Proceedings under the CCAA is consistent with the remedial purpose and flexibility of the CCAA;
17. The information which section 10(2) of the CCAA requires has been provided;
18. The Applicant is insolvent within the meaning of the CCAA;
19. The Applicant is a company to which the CCAA applies;
20. CRA asserts a claim in excess of \$31 million, which the Applicant disputes but cannot pay;
21. Continuation of these proceedings under the CCAA is appropriate and will provide the most effective framework for the Applicant to preserve its business as a going concern, maintain ordinary-course relationships with customers, suppliers, refiners and other stakeholders, address CRA enforcement actions, engage with CRA regarding the treatment

of Post-Filing Tax Assets and Pre-Filing Tax Liabilities, and determine the most appropriate path to resolve the issues arising from the Tax Assessments and the Applicant's restructuring;

22. Alix has consented to act as Monitor in the CCAA Proceedings and supports the relief sought in the Initial Order;

***Stay of Proceedings and CRA-related relief***

23. The Applicant seeks the Stay of Proceedings until November 14, 2026, or such other date as the Court may determine;
24. The stay is necessary to preserve the stability achieved during the NOI Proceedings and to allow the Company to continue operating as a going concern while advancing its restructuring efforts;
25. Without the stay, the Company may be exposed to further enforcement steps, collection activity, requirements to pay, garnishments, restrictions on its bank accounts, set-off, or other remedies that would impair liquidity and disrupt operations;
26. A meaningful stay period is required to permit the Tax Appeal and related CRA issues to advance while preserving stability;
27. The Applicant also seeks CRA-related relief to stay enforcement in respect of the Tax Assessments or any future tax assessment issued to the Company including any asserted set-off of Post-Filing Tax Assets against Pre-Filing Tax Liabilities during the Stay Period,

which is necessary to preserve liquidity, maintain ordinary-course operations, and allow the Company to pursue the restructuring and the Tax Appeal;

***Cash Flow Forecast***

28. A 13-week cash-flow forecast prepared by the Applicant, with the assistance of the Proposed Monitor, demonstrates that the Applicant will have sufficient liquidity to fund its operations and the costs of these proceedings during the proposed Stay of Proceedings;

***Priority Charges***

29. The Applicant does not maintain directors' and officers' liability insurance;
30. The Applicant seeks the granting of the following Court-ordered charges as part of the relief under the Initial Order, in the following priority:
- (a) **First:** a charge up to a maximum amount of CAD 500,000 to secure the fees and disbursements of the Proposed Monitor, counsel to the Proposal Monitor, and insolvency and tax counsel for the Applicant (the "**Administration Charge**"); and
  - (b) **Second:** a charge up to a maximum amount of CAD 165,000 in favour of the Applicant's Director and Officers (the "**Directors' Charge**");
31. Alix, in its capacity as the Proposal Trustee and the Proposed Monitor for the CCAA Proceedings, supports the continuation of the NOI Proceedings under the CCAA and the relief sought in the Initial Order;
32. No creditor will be materially prejudiced by the granting of the relief sought;

***Further Grounds***

33. The facts and circumstances set out in the affidavit of Erol Aksu sworn July 7, 2026, to be filed (the “**Aksu Affidavit**”);
34. The facts and circumstances set out in the Joint Report of Alix in its capacity as Proposal Trustee and proposed Monitor, to be filed (the “**Joint Report**”);
35. The provisions of the CCAA , including sections 2(1), 3(1), 10(2), 11, 11.02, 11.52, 11.6, 11.7, and the statutory, inherent and equitable jurisdiction of this Honourable Court;
36. Rules 1.04, 1.05, 2.01, 2.03, 16.04 and 37 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194, as amended, and section 106 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended; and
37. Such other grounds as counsel may advise and this Honourable Court may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the hearing of the motion:

1. The Aksu Affidavit;
2. The Joint Report, to be filed;
3. The consent of Alix to act as Monitor in the CCAA proceedings; and
4. Such other material as counsel may advise and this Honourable Court may permit.

July 7, 2025

**CHAITONS LLP**

Barristers and Solicitors  
5000 Yonge Street, 10th Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton** (LSO# 21592F)

Tel: (416) 218-1129

E-mail: harvey@chaitons.com

**Danish Afroz** (LSO# 65786B)

Tel: (416) 218-1137

E-mail: dafroz@chaitons.com

*Lawyers for the Applicant*

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED  
AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF 999 GOLD DEPOT (CANADA) LIMITED**

Court File No: BK-26-03367471-0031

***ONTARIO*  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT TORONTO

**NOTICE OF APPLICATION**

**CHAITONS LLP**

Barristers and Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton (LSO No. 21592F)**

Tel: (416) 218-1129

E-mail: [harvey@chaitons.com](mailto:harvey@chaitons.com)

**Danish Afroz (LSO No. 65786B)**

Tel: (416) 218-1137

E-mail: [dafroz@chaitons.com](mailto:dafroz@chaitons.com)

*Lawyers for the Applicant*

**TAB 4**

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

THE HONOURABLE ) MONDAY, THE 13<sup>TH</sup>  
JUSTICE STEELE ) DAY OF JULY, 2026

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,  
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF 999  
GOLD DEPOT (CANADA) LIMITED**

Applicant

**INITIAL ORDER**

**THIS MOTION**, made by the Applicant, including to continue the proposal proceedings commenced by 999 Gold Depot (Canada) Limited (the "**Applicant**") bearing court file no. BK-26-03367471-0031 and court/estate file no. 31-3367471 (the "**Proposal Proceedings**") under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**") was heard this day by videoconference via Zoom.

**ON READING** the affidavit of Erol Aksu sworn July 7, 2026 and the Exhibits thereto (the "**Aksu Affidavit**"), and the Report of AlixPartners Restructuring, Inc. (formerly KSV Restructuring Inc.) ("**Alix**"), in its capacity as proposal trustee in the Proposal Proceedings (the "**Proposal Trustee**") and as proposed monitor (the "**Monitor**") of the Applicant dated July 8, 2026 (the "**Joint Report**"), and on hearing the submissions of counsel for the Applicant, counsel for the proposed Monitor, and such other parties listed on the Counsel Slip, and on reading the consent of Alix to act as the Monitor,

## **SERVICE AND DEFINITIONS**

1. **THIS COURT ORDERS** that the time for service and filing of the Notice of Motion, Notice of Application and the Motion Record is hereby abridged and validated so that this motion is properly returnable today and hereby dispenses with further service thereof.
2. **THIS COURT ORDERS** that capitalized terms used in this Order but not otherwise defined herein shall have the meanings ascribed to them in the Aksu Affidavit.

## **CONTINUANCE UNDER THE CCAA**

3. **THIS COURT ORDERS AND DECLARES** that the Applicant is a company to which the CCAA applies.
4. **THIS COURT ORDERS** that the Proposal Proceedings (bearing court file no. BK-26-03367471-0031) are hereby taken up and continued under the CCAA and that, as of the date of this Order, the provisions of Part III of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”) shall have no further application to the Applicant, provided that: (a) any and all steps, agreements and procedures validly taken, done or entered into by the Applicant or the Proposal Trustee during the Proposal Proceedings shall remain valid and binding; (b) nothing herein shall affect, vary, derogate from, limit or amend, and Alix shall continue to have the benefit of, any and all of the rights, approvals and protections in favour of the Proposal Trustee at law or pursuant to the BIA or otherwise; and (c) the existing court file no. BK-26-03367471-0031 shall be the court file in respect of the Applicant’s proceedings under the CCAA (the “**CCAA Proceedings**”) and all further materials in the CCAA Proceedings shall be filed with the Commercial List Office in court file no. BK-26-03367471-0031.
5. **THIS COURT ORDERS** that, notwithstanding Section 50.4(8) of the BIA, the Applicant shall not be deemed to have made an assignment in bankruptcy as a result of not having filed a proposal with the Official Receiver.
6. **THIS COURT ORDERS** that Alix may take all necessary steps in furtherance of its discharge as Proposal Trustee in the Proposal Proceedings, including the taxation of its fees and disbursements and those of its counsel, in the within CCAA proceedings.

## **POSSESSION OF PROPERTY AND OPERATIONS**

7. **THIS COURT ORDERS** that the Applicant shall remain in possession and control of its current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate including all proceeds thereof (the “**Property**”). Subject to further Order of this Court, the Applicant shall continue to carry on business in a manner consistent with the preservation of its business (the “**Business**”) and the Property. The Applicant is authorized and empowered to continue to retain and employ the employees, consultants, agents, experts, accountants, counsel and such other persons (collectively “**Assistants**”) currently retained or employed by it, with liberty to retain such further Assistants as it deems reasonably necessary or desirable in the ordinary course of business or for the carrying out of the terms of this Order.

8. **THIS COURT ORDERS** that the Applicant shall be entitled to continue to utilize the central cash management system currently in place as described in the Aksu Affidavit or replace it with another substantially similar central cash management system (the “**Cash Management System**”) and that any present or future bank providing the Cash Management System shall: (i) not be under any obligation whatsoever to inquire into the propriety, validity or legality of any transfer, payment, collection or other action taken under the Cash Management System, or as to the use or application by the Applicant of funds transferred, paid, collected or otherwise dealt with in the Cash Management System, (ii) shall be entitled to provide the Cash Management System without any liability in respect thereof to any Person (as hereinafter defined) other than the Applicant, pursuant to the terms of the documentation applicable to the Cash Management System, and (iii) shall be, in its capacity as provider of the Cash Management System, an unaffected creditor under any plan of compromise or arrangement (a “**Plan**”) with regard to any claims or expenses it may suffer or incur in connection with the provision of the Cash Management System.

9. **THIS COURT ORDERS** that the Applicant, in accordance with the cash flow forecast appended to the Joint Report (the “**Cash Flow Forecast**”), as such cash flow forecast may be amended by the Applicant with the approval of the Monitor, shall be entitled but not required to pay the following expenses whether incurred prior to, on, or after the date of this Order:

- (a) all outstanding and future wages, salaries, employee and pension benefits, vacation pay, and expenses payable prior to, on, or after the date of this Order, in each case incurred

in the ordinary course of business and consistent with existing compensation policies and arrangements; and

- (b) the fees and disbursements of any Assistants retained or employed by the Applicant in respect of these proceedings, at their standard rates and charges.

10. **THIS COURT ORDERS** that, except as otherwise provided to the contrary herein, the Applicant shall be entitled but not required to pay all reasonable expenses incurred by the Applicant in carrying on the Business in the ordinary course on, or after April 30, 2026 (the “**NOI Filing Date**”), and in carrying out the provisions of this Order, which expenses shall include, without limitation:

- (a) all expenses and capital expenditures reasonably necessary for the preservation of the Property of the Business including, without limitation, payments on account of insurance (including directors’ and officers’ insurance), maintenance and security services; and
- (b) payment for goods or services actually supplied to the Applicant on or following the NOI Filing Date.

11. **THIS COURT ORDERS** that the Applicant shall remit, in accordance with legal requirements, or pay:

- (a) any statutory deemed trust amounts in favour of the Crown in right of Canada or of any Province thereof or any other taxation authority which are required to be deducted from employees’ wages, including, without limitation, amounts in respect of (i) employment insurance; (ii) Canada Pension Plan; and (iii) income taxes;
- (b) all goods and services or other applicable sales taxes (collectively, “**Sales Taxes**”) required to be remitted by the Applicant in connection with the sale of goods and services by the Applicant, but only where such Sales Taxes are accrued or collected after the NOI Filing Date, or where such Sales Taxes were accrued or collected prior to the NOI Filing Date but not required to be remitted until on or after the NOI Filing Date; and

- (c) any amount payable to the Crown in right of Canada or of any Province thereof or any political subdivision thereof or any other taxation authority in respect of municipal realty, municipal business or other taxes, assessments or levies of any nature or kind which are entitled at law to be paid in priority to claims of secured creditors and which are attributable to or in respect of the carrying on of the Business by the Applicant.

12. **THIS COURT ORDERS** that until a real property lease is disclaimed in accordance with the CCAA, the Applicant shall pay, all amounts constituting rent or payable as rent under real property leases (including, for greater certainty, common area maintenance charges, utilities and realty taxes and any other amounts payable to the landlord under the lease) or as otherwise may be negotiated between the applicable Applicant and the landlord from time to time (“**Rent**”), for the period commencing from and including April 30, 2026 (the “**NOI Filing Date**”), monthly on the first day of each month, in advance (but not in arrears). On the date of the first of such payments, any Rent relating to the period commencing from and including the date of NOI Filing Date shall also be paid.

13. **THIS COURT ORDERS** that, except as specifically permitted herein, the Applicant is hereby directed, until further Order of this Court: (i) to make no payments of principal, interest thereon or otherwise on account of amounts owing by the Applicant to any of its creditors as of this date; (ii) to grant no security interests, trust, liens, charges or encumbrances upon or in respect of any of its Property; and (iii) to not grant credit or incur liabilities except in the ordinary course of the Business.

## **RESTRUCTURING**

14. **THIS COURT ORDERS** that the Applicant shall, subject to such requirements as are imposed by the CCAA, have the right to:

- (a) permanently or temporarily cease, downsize or shut down any of its business or operations, and to dispose of redundant or non-material assets not exceeding \$250,000 in any one transaction or \$1,000,000 in the aggregate;
- (b) terminate the employment of such of its employees or temporarily lay off such of its employees as it deems appropriate; and

- (c) pursue all avenues of refinancing of its Business or Property, in whole or in part, subject to prior approval of this Court being obtained before any material refinancing,

all of the foregoing to permit the Applicant to proceed with an orderly restructuring of the Business (the “**Restructuring**”).

#### **NO PROCEEDINGS AGAINST THE APPLICANT OR THE PROPERTY**

15. **THIS COURT ORDERS** that until and including November 14, 2026, or such later date as this Court may order (the “**Stay Period**” or the “**Stay**”), no proceeding or enforcement process in any court or tribunal (each, a “**Proceeding**”, and collectively, “**Proceedings**”), shall be commenced or continued against or in respect of the Applicant or the Monitor, or affecting the Business or the Property, except with the written consent of the Applicant and the Monitor, or with leave of this Court, and any and all Proceedings currently under way against or in respect of the Applicant or affecting the Business or the Property are hereby stayed and suspended provided that the Stay shall not apply to the proceeding in the Tax Court of Canada bearing Federal Court File No. 2026-349(GST)G, which for avoidance of doubt shall remain procedurally unaffected by the Stay without further Order of the Court, but the Stay is applicable to the enforcement of any order made in such proceeding affecting the Monitor, the Business or the Property.

#### **NO EXERCISE OF RIGHTS OR REMEDIES**

16. **THIS COURT ORDERS** that during the Stay Period, all rights and remedies of any individual, firm, corporation, organization, governmental unit, body or agency, or any other entities (all of the foregoing, collectively being “**Persons**” and each being a “**Person**”) against or in respect of the Applicant or the Monitor, or affecting the Business or the Property (each such right, a “**Stayed Right**”), are hereby stayed and suspended except with the written consent of the Applicant and the Monitor, or leave of this Court, provided that nothing in this Order shall: (i) empower the Applicant to carry on any business which the Applicant is not lawfully entitled to carry on; (ii) affect such investigations, actions, suits or proceedings by a regulatory body as are permitted by Section 11.1 of the CCAA; (iii) prevent the filing of any registration to preserve or perfect a security interest; or (iv) prevent the registration of a claim for lien.

17. **THIS COURT ORDERS** that for avoidance of doubt and without limiting the scope of paragraphs 15 and 16 hereof, any enforcement process, procedure, right or mechanism in respect

of the tax assessments or reassessments issued by the Canada Revenue Agency (“CRA”) to the Applicant on or about March 2, 2023, and relating to the period from April 1, 2013 to August 31, 2019 (the “Tax Assessments”) or any future tax assessment issued to the Applicant is a Stayed Right to which the Stay applies, and for further avoidance of doubt, any right of set-off that may be enjoyed by the CRA between, on the one hand, any debt whatsoever owed by the Applicant to the CRA in respect of an obligation that pre-dates the NOI Filing Date (a “Pre-Filing Tax Liability”), and, on the other hand, any debt whatsoever, including without limitation any ITC under the *Excise Tax Act* (“ETA”), owed by the CRA to the Applicant in respect of an obligation that post-dates the NOI Filing Date (a “Post-Filing Tax Asset”), is also a Stayed Right to which the Stay applies, such that during the Stay Period and subject to paragraph 18 of this Order, all Post-Filing Tax Assets shall be processed and paid to the Applicant by the CRA as though no Pre-Filing Tax Liability existed; but this Order shall otherwise not be interpreted as affirming or denying the existence of such right of set-off, if any, as of before or after the Stay Period.

#### **NO INTERFERENCE WITH RIGHTS**

18. **THIS COURT ORDERS** that during the Stay Period, no Person shall accelerate, suspend, discontinue, fail to honour or renew, alter, interfere with, repudiate, rescind, terminate or cease to perform any right, renewal right, contract, agreement, lease, licence, authorization or permit in favour of or held by the Applicant, except with the prior written consent of the Applicant and the Monitor, or leave of this Court.

#### **CONTINUATION OF SERVICES**

19. **THIS COURT ORDERS** that during the Stay Period, all Persons having oral or written agreements with the Applicant or statutory or regulatory mandates for the supply of goods and/or services, including without limitation all computer software, communication and other data services, centralized banking services, payroll services, insurance, transportation services, utility or other services to the Business or the Applicant, are hereby restrained until further Order of this Court from discontinuing, altering, interfering with, suspending or terminating the supply of such goods or services as may be required by the Applicant, and that the Applicant shall be entitled to the continued use of its current premises, telephone numbers, facsimile numbers, internet addresses and domain names, provided in each case that the normal prices or charges for all such goods or services received after the date of this Order are paid by the Applicant in accordance with normal

payment practices of the Applicant or such other practices as may be agreed upon by the supplier or service provider and the Applicant and the Monitor, or as may be ordered by this Court.

### **NON-DEROGATION OF RIGHTS**

20. **THIS COURT ORDERS** that, notwithstanding anything else in this Order, no Person shall be prohibited from requiring immediate payment for goods, services, use of leased or licensed property or other valuable consideration provided on or after the date of this Order, nor shall any Person be under any obligation on or after the date of this Order to advance or re-advance any monies or otherwise extend any credit to the Applicant. Nothing in this Order shall derogate from the rights conferred and obligations imposed by the CCAA.

### **PROCEEDINGS AGAINST DIRECTORS AND OFFICERS**

21. **THIS COURT ORDERS** that during the Stay Period, and except as permitted by subsection 11.03(2) of the CCAA, no Proceeding may be commenced or continued against any of the former, current or future directors or officers of the Applicant (the “**Directors and Officers**”) with respect to any claim against the Directors or Officers that arose before the NOI Filing Date and that relates to any obligations of the Applicant whereby the directors or officers are alleged under any law to be liable in their capacity as Directors or Officers for the payment or performance of such obligations (including, but not limited to Proceedings arising from section 323 of the ETA), until a compromise or arrangement in respect of the Applicant, if one is filed, is sanctioned by this Court or is refused by the creditors of the Applicant or this Court.

### **DIRECTORS’ AND OFFICERS’ INDEMNIFICATION AND CHARGE**

22. **THIS COURT ORDERS** that the Applicant shall indemnify the Directors and Officers against obligations and liabilities that they may incur as a Director or Officer of the Applicant after the commencement of the within proceedings, except to the extent that, with respect to any Director or Officer, the obligation or liability was incurred as a result of such Director’s or Officer’s gross negligence or wilful misconduct.

23. **THIS COURT ORDERS** that the Directors and Officers of the Applicant shall be entitled to the benefit of and are hereby granted a charge (the “**Directors’ Charge**”) on the Property, which charge shall not exceed an aggregate amount of \$165,000, unless permitted by further Order of

this Court, as security for the indemnity provided in paragraph 22 of this Order. The Directors' Charge shall have the priority set out in paragraphs 34 and 36 herein.

24. **THIS COURT ORDERS** that, notwithstanding any language in any applicable insurance policy to the contrary: (a) no insurer shall be entitled to be subrogated to or claim the benefit of the Directors' Charge; and (b) the Applicant's Directors and Officers shall only be entitled to the benefit of the Directors' Charge to the extent that they do not have coverage under any directors' and officers' insurance policy, or to the extent that such coverage is insufficient to pay amounts indemnified in accordance with paragraph 22 of this Order.

#### **APPOINTMENT OF MONITOR**

25. **THIS COURT ORDERS** that Alix is hereby appointed pursuant to the CCAA as the Monitor, an officer of this Court, to monitor the business and financial affairs of the Applicant with the powers and obligations set out in the CCAA or set forth herein and that the Applicant and its shareholders, officers, directors, and Assistants shall advise the Monitor of all material steps taken by the Applicant pursuant to this Order, and shall co-operate fully with the Monitor in the exercise of its powers and discharge of its obligations and provide the Monitor with the assistance that is necessary to enable the Monitor to adequately carry out the Monitor's functions.

26. **THIS COURT ORDERS** that the Monitor, in addition to its prescribed rights and obligations under the CCAA, is hereby directed and empowered to:

- (a) monitor the Applicant's receipts and disbursements;
- (b) report to this Court at such times and intervals as the Monitor may deem appropriate with respect to matters relating to the Property, the Business, and such other matters as may be relevant to the proceedings herein;
- (c) advise the Applicant in its preparation of the Applicant's cash flow statements;
- (d) have full and complete access to the Property, including the premises, books, records, data, including data in electronic form, and other financial documents of the Applicant to the extent that is necessary to adequately assess the Applicant's business and financial affairs or to perform its duties arising under this Order;

- (e) be at liberty to engage independent legal counsel or such other persons as the Monitor deems necessary or advisable respecting the exercise of its powers and performance of its obligations under this Order; and
- (f) perform such other duties as are required by this Order or by this Court from time to time.

27. **THIS COURT ORDERS** that the Monitor shall not take possession of the Property and shall take no part whatsoever in the management or supervision of the management of the Business and shall not, by fulfilling its obligations hereunder, be deemed to have taken or maintained possession or control of the Business or Property, or any part thereof.

28. **THIS COURT ORDERS** that nothing herein contained shall require the Monitor to occupy or to take control, care, charge, possession or management (separately and/or collectively, “**Possession**”) of any of the Property that might be environmentally contaminated, might be a pollutant or a contaminant, or might cause or contribute to a spill, discharge, release or deposit of a substance contrary to any federal, provincial or other law respecting the protection, conservation, enhancement, remediation or rehabilitation of the environment or relating to the disposal of waste or other contamination including, without limitation, the *Canadian Environmental Protection Act*, the *Ontario Environmental Protection Act*, the *Ontario Water Resources Act*, or the *Ontario Occupational Health and Safety Act* and regulations thereunder (the “**Environmental Legislation**”), provided however that nothing herein shall exempt the Monitor from any duty to report or make disclosure imposed by applicable Environmental Legislation. The Monitor shall not, as a result of this Order or anything done in pursuance of the Monitor's duties and powers under this Order, be deemed to be in Possession of any of the Property within the meaning of any Environmental Legislation, unless it is actually in possession.

29. **THIS COURT ORDERS** that that the Monitor shall provide any creditor of the Applicant with information provided by the Applicant in response to reasonable requests for information made in writing by such creditor addressed to the Monitor. The Monitor shall not have any responsibility or liability with respect to the information disseminated by it pursuant to this paragraph. In the case of information that the Monitor has been advised by the Applicant is confidential, the Monitor shall not provide such information to creditors unless otherwise directed by this Court or on such terms as the Monitor and the Applicant may agree.

30. **THIS COURT ORDERS** that, in addition to the rights and protections afforded to the Monitor under the CCAA or as an officer of this Court, the Monitor shall incur no liability or obligation as a result of its appointment or the carrying out of the provisions of this Order, save and except for any gross negligence or wilful misconduct on its part. Nothing in this Order shall derogate from the protections afforded the Monitor by the CCAA or any applicable legislation.

31. **THIS COURT ORDERS** that the Monitor, counsel to the Monitor and counsel to the Applicant shall be paid their reasonable fees and disbursements, in each case at their standard rates and charges, whether incurred prior to, on, or subsequent to the date of this Order, by the Applicant as part of the costs of these proceedings. The Applicant is hereby authorized and directed to pay the accounts of the Monitor, counsel for the Monitor and counsel for the Applicant on a bi-weekly basis or on such other terms as the parties may agree.

32. **THIS COURT ORDERS** that the Monitor, counsel to the Monitor, and the Applicant's counsel, which for clarity includes all Applicant's counsel such as restructuring counsel and tax counsel, shall be entitled to the benefit of and are hereby granted a charge (the "**Administration Charge**") on the Property, which charge shall not exceed an aggregate amount of \$500,000, as security for their professional fees and disbursements incurred at the standard rates and charges of the Monitor and such counsel, both before and after the making of this Order, and both in respect of these proceedings and proceedings in the Tax Court of Canada in respect of the Tax Assessments or similar proceedings. The Administration Charge shall have the priority set out in paragraphs 34 and 36 hereof.

33. **THIS COURT ORDERS** that the Monitor and its legal counsel shall pass their accounts from time to time, and for this purpose the accounts of the Monitor and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice.

#### **VALIDITY AND PRIORITY OF CHARGES CREATED BY THIS ORDER**

34. **THIS COURT ORDERS** that the priorities of the Directors' Charge and the Administration Charge (collectively, the "**Charges**"), as among them, shall be as follows:

First – Administrative Charge (to the maximum amount of \$500,000); and

Second – Directors' Charge (to the maximum amount of \$165,000).

35. **THIS COURT ORDERS** that the filing, registration or perfection of the Charges shall not be required, and that the Charges shall be effective as against the Property and shall be valid and enforceable for all purposes, including as against any right, title or interest filed, registered, recorded or perfected subsequent to the Charges coming into existence, notwithstanding any such failure to file, register, record or perfect.

36. **THIS COURT ORDERS** that each of the Charges (all as constituted and defined herein) shall constitute a charge on the Property and such Charges shall rank in priority to all other security interests, trusts (including deemed trusts), liens, charges and encumbrances, and claims of secured creditors, statutory or otherwise (collectively, “**Encumbrances**”) in favour of any Person.

37. **THIS COURT ORDERS** that except as otherwise expressly provided for herein, or as may be approved by this Court, the Applicant shall not grant any Encumbrances over any Property that rank in priority to, or *pari passu* with, any of the Charges unless the Applicant also obtains the prior written consent of the Monitor and the beneficiaries of the applicable Charges, or further Order of this Court.

38. **THIS COURT ORDERS** that the Charges shall not be rendered invalid or unenforceable and the rights and remedies of the chargees entitled to the benefit of the Charges (collectively, the “**Chargees**”) thereunder shall not otherwise be limited or impaired in any way by: (a) the pendency of these proceedings and the declarations of insolvency made herein; (b) any application(s) for bankruptcy order(s) issued pursuant to BIA, or any bankruptcy order made pursuant to such applications; (c) the filing of any assignments for the general benefit of creditors made pursuant to the BIA; (d) the provisions of any federal or provincial statutes; or (e) any negative covenants, prohibitions or other similar provisions with respect to borrowings, incurring debt or the creation of Encumbrances, contained in any existing loan documents, lease, sublease, offer to lease or other agreement (collectively, an “**Agreement**”) which binds the Applicant, and notwithstanding any provision to the contrary in any Agreement:

- (a) the creation of the Charges shall not create or be deemed to constitute a breach by the Applicant of any Agreement to which it is a party;

- (b) none of the Chargees shall have any liability to any Person whatsoever as a result of any breach of any Agreement caused by or resulting from the creation of the Charges; and
- (c) the payments made by the Applicant pursuant to this Order, and the granting of the Charges, do not and will not constitute preferences, fraudulent conveyances, transfers at undervalue, oppressive conduct, or other challengeable or voidable transactions under any applicable law.

39. **THIS COURT ORDERS** that any Charge created by this Order over leases of real property in Canada shall only be a Charge in the Applicant's interest in such real property leases.

#### **SERVICE AND NOTICE**

40. **THIS COURT ORDERS** that the Monitor shall: (i) without delay, publish in *The Globe and Mail*, National Edition, a notice containing the information prescribed under the CCAA; and (ii) within five (5) days after the date of this Order, (A) make this Order publicly available in the manner prescribed under the CCAA, (B) send, or cause to be sent, in the prescribed manner, a notice to every known creditor who has a claim against the Applicant of more than \$1,000 (excluding individual employees, and former employees), and (C) prepare a list showing the names and addresses of those creditors and the estimated amounts of those claims, and make it publicly available in the prescribed manner, all in accordance with Section 23(1)(a) of the CCAA and the regulations made thereunder.

41. **THIS COURT ORDERS** that the E-Service Protocol of the Commercial List (the "**Protocol**") is approved and adopted by reference herein and, in this proceeding, the service of documents made in accordance with the Protocol (which can be found on the Commercial List website at <http://www.ontariocourts.ca/scj/practice/practice-directions/toronto/e-service-protocol/>) shall be valid and effective service. Subject to Rule 17.05 this Order shall constitute an order for substituted service pursuant to Rule 16.04 of the Rules of Civil Procedure. Subject to Rule 3.01(d) of the Rules of Civil Procedure and paragraph 21 of the Protocol, service of documents in accordance with the Protocol will be effective on transmission. This Court further orders that a Case Website shall be established in accordance with the Protocol with the following URL: <https://www.ksvadvisory.com/experience/case/golddepot> (the "**Website**").

42. **THIS COURT ORDERS** that if the service or distribution of documents in accordance with the Protocol or CCAA is not practicable, the Applicant and the Monitor are at liberty to serve or distribute this Order, any other materials and orders in these proceedings, any notices or other correspondence, by forwarding true copies thereof by pre-paid ordinary mail, courier, personal delivery, facsimile transmission or electronic message (including e-mail) to the Applicant's creditors or other interested parties at their respective addresses or email addresses as last shown on the records of the Applicant and that any such service or distribution by courier, personal delivery or facsimile transmission shall be deemed to be received on the next business day following the date forwarding thereof, or if sent by ordinary mail, on the third business day after mailing.

#### **GENERAL**

43. **THIS COURT ORDERS** that any interested party that wishes to amend or vary this Order shall be entitled to appear or bring a motion before this Court to vary or amend this order on not less than seven (7) days' notice to any other party or parties likely to be affected by the order sought or upon such other notice, if any, as this Court may order.

44. **THIS COURT ORDERS** that, notwithstanding paragraph 43 of this Order, the Applicant or the Monitor may, from time to time, apply to this Court to amend, vary or supplement this Order or for advice and directions in the discharge of their respective powers and duties under this Order or in the interpretation of this Order hereunder.

45. **THIS COURT ORDERS** that nothing in this Order shall prevent the Monitor from acting as an interim receiver, a receiver, a receiver and manager, or a trustee in bankruptcy of the Applicant, the Business or the Property.

46. **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States, to give effect to this Order and to assist the Applicant, the Monitor and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Applicant and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this

Order, to grant representative status to the Applicant in any foreign proceeding, or to assist the Applicant and the Monitor and their respective agents in carrying out the terms of this Order.

47. **THIS COURT ORDERS** that each of the Applicant and the Monitor be at liberty and is hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Monitor is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

48. **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. (Toronto Time) on the date of this Order without the need for entry or filing.

---

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF 999 GOLD DEPOT (CANADA) LIMITED

Court File No: BK-26-03367471-0031

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT TORONTO

**INITIAL ORDER**

**CHAITONS LLP**

Barristers and Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

**Harvey Chaiton (LSO No. 21592F)**

Tel: (416) 218-1129

E-mail: [harvey@chaitons.com](mailto:harvey@chaitons.com)

**Danish Afroz (LSO No. 65786B)**

Tel: (416) 218-1137

E-mail: [dafroz@chaitons.com](mailto:dafroz@chaitons.com)

*Lawyers for the Applicant*

**TAB 5**

Court File No.

BK-26-03367471-0031

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
COMMERCIAL LIST**

THE HONOURABLE ) ~~WEEKDAY~~MONDAY, THE #13<sup>TH</sup>  
JUSTICE —STEELE ) DAY OF ~~MONTH~~JULY, ~~20YR~~2026

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,  
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF  
~~[APPLICANT'S NAME]~~ (the "999 GOLD DEPOT (CANADA) LIMITED)**

Applicant<sup>(s)</sup>

**INITIAL ORDER**

**THIS ~~APPLICATION~~MOTION**, made by the Applicant, ~~pursuant to~~including to continue the proposal proceedings commenced by 999 Gold Depot (Canada) Limited (the "Applicant") bearing court file no. BK-26-03367471-0031 and court/estate file no. 31-3367471 (the "Proposal Proceedings") under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA") was heard this day ~~at 330 University Avenue, Toronto, Ontario~~by videoconference via Zoom.

**ON READING** the affidavit of ~~[NAME]~~Erol Aksu sworn ~~[DATE]~~July 7, 2026 and the Exhibits thereto ~~(the "Aksu Affidavit")~~, and ~~on being advised that the secured creditors who are likely to be affected by the charges created herein were given notice~~the Report of AlixPartners Restructuring, Inc. (formerly KSV Restructuring Inc.) ("Alix"), in its capacity as proposal trustee in the Proposal Proceedings (the "Proposal Trustee") and as proposed monitor (the "Monitor") of the Applicant dated July 8, 2026 (the "Joint Report"), and on hearing the submissions of

counsel for ~~[NAMES], no one appearing for [NAME]<sup>1</sup> although duly served as appears from the affidavit of service of [NAME] sworn [DATE]~~the Applicant, counsel for the proposed Monitor, and such other parties listed on the Counsel Slip, and on reading the consent of ~~[MONITOR'S NAME]~~Alix to act as the Monitor,

## **SERVICE AND DEFINITIONS**

1. **THIS COURT ORDERS** that the time for service and filing of the Notice of Motion, Notice of Application and the ~~Application~~Motion Record is hereby abridged and validated<sup>2</sup> so that this ~~Application~~motion is properly returnable today and hereby dispenses with further service thereof.

## **APPLICATION**

2. **THIS COURT ORDERS** that capitalized terms used in this Order but not otherwise defined herein shall have the meanings ascribed to them in the Aksu Affidavit.

## **CONTINUANCE UNDER THE CCAA**

3. ~~2.~~ **THIS COURT ORDERS AND DECLARES** that the Applicant is a company to which the CCAA applies.

## **PLAN OF ARRANGEMENT**

4. **THIS COURT ORDERS** that the Proposal Proceedings (bearing court file no. BK-26-03367471-0031) are hereby taken up and continued under the CCAA and that, as of the date of this Order, the provisions of Part III of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, as amended (the "BIA") shall have no further application to the Applicant, provided that:

---

<sup>1</sup>~~Include names of secured creditors or other persons who must be served before certain relief in this model Order may be granted. See, for example, CCAA Sections 11.2(1), 11.3(1), 11.4(1), 11.51(1), 11.52(1), 32(1), 32(3), 33(2) and 36(2).~~

<sup>2</sup>~~If service is effected in a manner other than as authorized by the Ontario Rules of Civil Procedure, an order validating irregular service is required pursuant to Rule 16.08 of the Rules of Civil Procedure and may be granted in appropriate circumstances.~~

(a) any and all steps, agreements and procedures validly taken, done or entered into by the Applicant or the Proposal Trustee during the Proposal Proceedings shall remain valid and binding; (b) nothing herein shall affect, vary, derogate from, limit or amend, and Alix shall continue to have the benefit of, any and all of the rights, approvals and protections in favour of the Proposal Trustee at law or pursuant to the BIA or otherwise; and (c) the existing court file no. BK-26-03367471-0031 shall be the court file in respect of the Applicant's proceedings under the CCAA (the "CCAA Proceedings") and all further materials in the CCAA Proceedings shall be filed with the Commercial List Office in court file no. BK-26-03367471-0031.

5. ~~3.~~ THIS COURT ORDERS that, notwithstanding Section 50.4(8) of the BIA, the Applicant shall not be deemed to have ~~the authority to file and may, subject to further order of this Court, file with this Court a plan of compromise or arrangement (hereinafter referred to as the "Plan")~~ made an assignment in bankruptcy as a result of not having filed a proposal with the Official Receiver.

6. THIS COURT ORDERS that Alix may take all necessary steps in furtherance of its discharge as Proposal Trustee in the Proposal Proceedings, including the taxation of its fees and disbursements and those of its counsel, in the within CCAA proceedings.

## **POSSESSION OF PROPERTY AND OPERATIONS**

7. ~~4.~~ THIS COURT ORDERS that the Applicant shall remain in possession and control of its current and future assets, undertakings and properties of every nature and kind whatsoever, and wherever situate including all proceeds thereof (the "Property"). Subject to further Order of this Court, the Applicant shall continue to carry on business in a manner consistent with the preservation of its business (the "Business") and the Property. The Applicant is authorized and empowered to continue to retain and employ the employees, consultants, agents, experts, accountants, counsel and such other persons (collectively "Assistants") currently retained or employed by it, with liberty to retain such further Assistants as it deems reasonably necessary or desirable in the ordinary course of business or for the carrying out of the terms of this Order.

8. ~~5.~~ THIS COURT ORDERS that the Applicant shall be entitled to continue to utilize the central cash management system<sup>3</sup> currently in place as described in the Aksu Affidavit of ~~<sup>3</sup>This provision should only be utilized where necessary, in view of the fact that central cash management systems often operate in a manner that consolidates the cash of applicant companies. Specific attention should be paid to~~

~~[NAME] sworn [DATE]~~ or replace it with another substantially similar central cash management system (the "Cash Management System") and that any present or future bank providing the Cash Management System shall: (i) not be under any obligation whatsoever to inquire into the propriety, validity or legality of any transfer, payment, collection or other action taken under the Cash Management System, or as to the use or application by the Applicant of funds transferred, paid, collected or otherwise dealt with in the Cash Management System, (ii) shall be entitled to provide the Cash Management System without any liability in respect thereof to any Person (as hereinafter defined) other than the Applicant, pursuant to the terms of the documentation applicable to the Cash Management System, and (iii) shall be, in its capacity as provider of the Cash Management System, an unaffected creditor under ~~the any plan of compromise or arrangement (a "Plan")~~ with regard to any claims or expenses it may suffer or incur in connection with the provision of the Cash Management System.}

9. ~~6.~~ **THIS COURT ORDERS** that the Applicant, in accordance with the cash flow forecast appended to the Joint Report (the "Cash Flow Forecast"), as such cash flow forecast may be amended by the Applicant with the approval of the Monitor, shall be entitled but not required to pay the following expenses whether incurred prior to, on, or after the date of this Order:

- (a) all outstanding and future wages, salaries, employee and pension benefits, vacation pay, and expenses payable prior to, on, or after the date of this Order, in each case incurred in the ordinary course of business and consistent with existing compensation policies and arrangements; and
- (b) the fees and disbursements of any Assistants retained or employed by the Applicant in respect of these proceedings, at their standard rates and charges.

10. ~~7.~~ **THIS COURT ORDERS** that, except as otherwise provided to the contrary herein, the Applicant shall be entitled but not required to pay all reasonable expenses incurred by the Applicant in carrying on the Business in the ordinary course on, or after ~~this Order~~ April 30, 2026

~~often operate in a manner that consolidates the cash of applicant companies. Specific attention should be paid to cross border and inter company transfers of cash.~~

(the “NOI Filing Date”), and in carrying out the provisions of this Order, which expenses shall include, without limitation:

- (a) all expenses and capital expenditures reasonably necessary for the preservation of the Property ~~or~~of the Business including, without limitation, payments on account of insurance (including directors’ and officers’ insurance), maintenance and security services; and
- (b) payment for goods or services actually supplied to the Applicant on or following the ~~date of this Order~~NOI Filing Date.

11. ~~8.~~ **THIS COURT ORDERS** that the Applicant shall remit, in accordance with legal requirements, or pay:

- (a) any statutory deemed trust amounts in favour of the Crown in right of Canada or of any Province thereof or any other taxation authority which are required to be deducted from employees’ wages, including, without limitation, amounts in respect of (i) employment insurance; (ii) Canada Pension Plan; and (iii) ~~Quebec Pension Plan, and (iv)~~ income taxes;
- (b) all goods and services or other applicable sales taxes (collectively, “Sales Taxes”) required to be remitted by the Applicant in connection with the sale of goods and services by the Applicant, but only where such Sales Taxes are accrued or collected after the ~~date of this Order~~NOI Filing Date, or where such Sales Taxes were accrued or collected prior to the ~~date of this Order~~NOI Filing Date but not required to be remitted until on or after the ~~date of this Order~~NOI Filing Date; and
- (c) any amount payable to the Crown in right of Canada or of any Province thereof or any political subdivision thereof or any other taxation authority in respect of municipal realty, municipal business or other taxes, assessments or levies of any nature or kind which are entitled at law to be paid in priority to claims of secured creditors and which are attributable to or in respect of the carrying on of the Business by the Applicant.

12. ~~9.~~ **THIS COURT ORDERS** that until a real property lease is disclaimed ~~{or resiliated}~~<sup>4</sup> in accordance with the CCAA, the Applicant shall pay, all amounts constituting rent or payable as rent under real property leases (including, for greater certainty, common area maintenance charges, utilities and realty taxes and any other amounts payable to the landlord under the lease) or as otherwise may be negotiated between the applicable Applicant and the landlord from time to time ("Rent"), for the period commencing from and including April 30, 2026 (the ~~date of this Order~~ "NOI Filing Date"), ~~twice-monthly in equal payments~~ on the first ~~and fifteenth~~ day of each month, in advance (but not in arrears). On the date of the first of such payments, any Rent relating to the period commencing from and including the date of ~~this Order~~ NOI Filing Date shall also be paid.

13. ~~10.~~ **THIS COURT ORDERS** that, except as specifically permitted herein, the Applicant is hereby directed, until further Order of this Court: (a) to make no payments of principal, interest thereon or otherwise on account of amounts owing by the Applicant to any of its creditors as of this date; (b) to grant no security interests, trust, liens, charges or encumbrances upon or in respect of any of its Property; and (c) to not grant credit or incur liabilities except in the ordinary course of the Business.

## RESTRUCTURING

14. ~~11.~~ **THIS COURT ORDERS** that the Applicant shall, subject to such requirements as are imposed by the CCAA ~~and such covenants as may be contained in the Definitive Documents (as hereinafter defined)~~, have the right to:

- (a) permanently or temporarily cease, downsize or shut down any of its business or operations, ~~and~~ to dispose of redundant or non-material assets not exceeding \$ 250,000 in any one transaction or \$ 1,000,000 in the aggregate;<sup>5</sup>

<sup>4</sup> ~~The term "resiliate" should remain if there are leased premises in the Province of Quebec, but can otherwise be removed.~~

<sup>5</sup> ~~Section 36 of the amended CCAA does not seem to contemplate a pre-approved power to sell (see subsection 36(3)) and moreover requires notice (subsection 36(2)) and evidence (subsection 36(7)) that may not have occurred or be available at the initial CCAA hearing.~~

- (b) ~~terminate the employment of such of its employees or temporarily lay off such of its employees as it deems appropriate~~; and
- (c) pursue all avenues of refinancing of its Business or Property, in whole or in part, subject to prior approval of this Court being obtained before any material refinancing,

all of the foregoing to permit the Applicant to proceed with an orderly restructuring of the Business (the "Restructuring").

~~12.— THIS COURT ORDERS that the Applicant shall provide each of the relevant landlords with notice of the Applicant's intention to remove any fixtures from any leased premises at least seven (7) days prior to the date of the intended removal. The relevant landlord shall be entitled to have a representative present in the leased premises to observe such removal and, if the landlord disputes the Applicant's entitlement to remove any such fixture under the provisions of the lease, such fixture shall remain on the premises and shall be dealt with as agreed between any applicable secured creditors, such landlord and the Applicant, or by further Order of this Court upon application by the Applicant on at least two (2) days notice to such landlord and any such secured creditors. If the Applicant disclaims ~~[or resiliates]~~ the lease governing such leased premises in accordance with Section 32 of the CCAA, it shall not be required to pay Rent under such lease pending resolution of any such dispute (other than Rent payable for the notice period provided for in Section 32(5) of the CCAA), and the disclaimer ~~[or resiliation]~~ of the lease shall be without prejudice to the Applicant's claim to the fixtures in dispute.~~

~~13.— THIS COURT ORDERS that if a notice of disclaimer ~~[or resiliation]~~ is delivered pursuant to Section 32 of the CCAA, then (a) during the notice period prior to the effective time of the disclaimer ~~[or resiliation]~~, the landlord may show the affected leased premises to prospective tenants during normal business hours, on giving the Applicant and the Monitor 24 hours' prior written notice, and (b) at the effective time of the disclaimer ~~[or resiliation]~~, the relevant landlord shall be entitled to take possession of any such leased premises without waiver of or prejudice to any claims or rights such landlord may have against the Applicant in respect of such lease or leased premises, provided that nothing herein shall relieve such landlord of its obligation to mitigate any damages claimed in connection therewith.~~

## NO PROCEEDINGS AGAINST THE APPLICANT OR THE PROPERTY

15. ~~14.~~ **THIS COURT ORDERS** that until and including ~~{DATE — MAX. 30~~  
~~DAYS}~~ November 14, 2026, or such later date as this Court may order (the “Stay Period” or  
the “Stay”), no proceeding or enforcement process in any court or tribunal (each, a  
“Proceeding”, and collectively, “Proceedings”), shall be commenced or continued against or  
in respect of the Applicant or the Monitor, or affecting the Business or the Property, except with  
the written consent of the Applicant and the Monitor, or with leave of this Court, and any and all  
Proceedings currently under way against or in respect of the Applicant or affecting the Business  
or the Property are hereby stayed and suspended ~~pending~~ provided that the Stay shall not apply to  
the proceeding in the Tax Court of Canada bearing Federal Court File No. 2026-349(GST)G,  
which for avoidance of doubt shall remain procedurally unaffected by the Stay without further  
Order of ~~this~~ the Court, but the Stay is applicable to the enforcement of any order made in such  
proceeding affecting the Monitor, the Business or the Property.

## NO EXERCISE OF RIGHTS OR REMEDIES

16. ~~15.~~ **THIS COURT ORDERS** that during the Stay Period, all rights and remedies of any  
individual, firm, corporation, organization, governmental unit, body or agency, or any other  
entities (all of the foregoing, collectively being “Persons” and each being a “Person”)  
against or in respect of the Applicant or the Monitor, or affecting the Business or the Property  
(each such right, a “Stayed Right”), are hereby stayed and suspended except with the written  
consent of the Applicant and the Monitor, or leave of this Court, provided that nothing in this  
Order shall: (i) empower the Applicant to carry on any business which the Applicant is not  
lawfully entitled to carry on; (ii) affect such investigations, actions, suits or proceedings by a  
regulatory body as are permitted by Section 11.1 of the CCAA; (iii) prevent the filing of any  
registration to preserve or perfect a security interest; or (iv) prevent the registration of a claim  
for lien.

17. **THIS COURT ORDERS** that for avoidance of doubt and without limiting the scope of  
paragraphs 15 and 16 hereof, any enforcement process, procedure, right or mechanism in respect  
of the tax assessments or reassessments issued by the Canada Revenue Agency (“CRA”) to the  
Applicant on or about March 2, 2023, and relating to the period from April 1, 2013 to August 31,  
2019 (the “Tax Assessments”) or any future tax assessment issued to the Applicant is a Stayed

Right to which the Stay applies, and for further avoidance of doubt, any right of set-off that may be enjoyed by the CRA between, on the one hand, any debt whatsoever owed by the Applicant to the CRA in respect of an obligation that pre-dates the NOI Filing Date (a “Pre-Filing Tax Liability”), and, on the other hand, any debt whatsoever, including without limitation any ITC under the Excise Tax Act (“ETA”), owed by the CRA to the Applicant in respect of an obligation that post-dates the NOI Filing Date (a “Post-Filing Tax Asset”), is also a Stayed Right to which the Stay applies, such that during the Stay Period and subject to paragraph 18 of this Order, all Post-Filing Tax Assets shall be processed and paid to the Applicant by the CRA as though no Pre-Filing Tax Liability existed; but this Order shall otherwise not be interpreted as affirming or denying the existence of such right of set-off, if any, as of before or after the Stay Period.

#### **NO INTERFERENCE WITH RIGHTS**

18. ~~16.~~ **THIS COURT ORDERS** that during the Stay Period, no Person shall accelerate, suspend, discontinue, fail to honour or renew, alter, interfere with, repudiate, rescind, terminate or cease to perform any right, renewal right, contract, agreement, lease, licence, authorization or permit in favour of or held by the Applicant, except with the prior written consent of the Applicant and the Monitor, or leave of this Court.

#### **CONTINUATION OF SERVICES**

19. ~~17.~~ **THIS COURT ORDERS** that during the Stay Period, all Persons having oral or written agreements with the Applicant or statutory or regulatory mandates for the supply of goods and/or services, including without limitation all computer software, communication and other data services, centralized banking services, payroll services, insurance, transportation services, utility or other services to the Business or the Applicant, are hereby restrained until further Order of this Court from discontinuing, altering, interfering with, suspending or terminating the supply of such goods or services as may be required by the Applicant, and that the Applicant shall be entitled to the continued use of its current premises, telephone numbers, facsimile numbers, internet addresses and domain names, provided in each case that the normal prices or charges for all such goods or services received after the date of this Order are paid by the Applicant in accordance with normal payment practices of the Applicant or such other practices as may be agreed upon by the supplier or service provider and ~~each of~~ the Applicant and the Monitor, or as may be ordered by this Court.

## NON-DEROGATION OF RIGHTS

20. ~~18.~~ **THIS COURT ORDERS** that, notwithstanding anything else in this Order, no Person shall be prohibited from requiring immediate payment for goods, services, use of ~~lease~~leased or licensed property or other valuable consideration provided on or after the date of this Order, nor shall any Person be under any obligation on or after the date of this Order to advance or re-advance any monies or otherwise extend any credit to the Applicant. Nothing in this Order shall derogate from the rights conferred and obligations imposed by the CCAA.<sup>6</sup>

## PROCEEDINGS AGAINST DIRECTORS AND OFFICERS

21. ~~19.~~ **THIS COURT ORDERS** that during the Stay Period, and except as permitted by subsection 11.03(2) of the CCAA, no Proceeding may be commenced or continued against any of the former, current or future directors or officers of the Applicant (the “**Directors and Officers**”) with respect to any claim against the ~~directors~~Directors or ~~officers~~Officers that arose before the ~~date hereof~~NOI Filing Date and that relates to any obligations of the Applicant whereby the directors or officers are alleged under any law to be liable in their capacity as ~~directors~~Directors or ~~officers~~Officers for the payment or performance of such obligations (including, but not limited to Proceedings arising from section 323 of the ETA), until a compromise or arrangement in respect of the Applicant, if one is filed, is sanctioned by this Court or is refused by the creditors of the Applicant or this Court.

## DIRECTORS’ AND OFFICERS’ INDEMNIFICATION AND CHARGE

22. ~~20.~~ **THIS COURT ORDERS** that the Applicant shall indemnify ~~its directors~~the Directors and ~~officers~~Officers against obligations and liabilities that they may incur as ~~directors~~a Director or ~~officers~~Officer of the Applicant after the commencement of the within proceedings,<sup>7</sup>

---

<sup>6</sup> ~~This non-derogation provision has acquired more significance due to the recent amendments to the CCAA, since a number of actions or steps cannot be stayed, or the stay is subject to certain limits and restrictions. See, for example, CCAA Sections 11.01, 11.04, 11.06, 11.07, 11.08, 11.1(2) and 11.5(1).~~

<sup>7</sup> ~~The broad indemnity language from Section 11.51 of the CCAA has been imported into this paragraph. The granting of the indemnity (whether or not secured by a Directors’ Charge), and the scope of the indemnity, are discretionary matters that should be addressed with the Court.~~

except to the extent that, with respect to any ~~officer~~Director or ~~director~~Officer, the obligation or liability was incurred as a result of ~~the director's~~such Director's or ~~officer's~~Officer's gross negligence or wilful misconduct.

23. ~~21.~~ **THIS COURT ORDERS** that the ~~directors~~Directors and ~~officers~~Officers of the Applicant shall be entitled to the benefit of and are hereby granted a charge (the "Directors' Charge")<sup>8</sup> on the Property, which charge shall not exceed an aggregate amount of \$~~165,000~~165,000, unless permitted by further Order of this Court, as security for the indemnity provided in paragraph ~~20~~22 of this Order. The Directors' Charge shall have the priority set out in paragraphs ~~38~~34 and ~~40~~36 herein.

24. ~~22.~~ **THIS COURT ORDERS** that, notwithstanding any language in any applicable insurance policy to the contrary;; (a) no insurer shall be entitled to be subrogated to or claim the benefit of the Directors' Charge;; and (b) the Applicant's ~~directors~~Directors and ~~officers~~Officers shall only be entitled to the benefit of the Directors' Charge to the extent that they do not have coverage under any directors'' and officers'' insurance policy, or to the extent that such coverage is insufficient to pay amounts indemnified in accordance with paragraph ~~20~~22 of this Order.

#### **APPOINTMENT OF MONITOR**

25. ~~23.~~ **THIS COURT ORDERS** that ~~[MONITOR'S NAME]~~Alix is hereby appointed pursuant to the CCAA as the Monitor, an officer of this Court, to monitor the business and financial affairs of the Applicant with the powers and obligations set out in the CCAA or set forth herein and that the Applicant and its shareholders, officers, directors, and Assistants shall advise the Monitor of all material steps taken by the Applicant pursuant to this Order, and shall co-operate fully with the Monitor in the exercise of its powers and discharge of its obligations and provide the Monitor with the assistance that is necessary to enable the Monitor to adequately carry out the Monitor's functions.

26. ~~24.~~ **THIS COURT ORDERS** that the Monitor, in addition to its prescribed rights and obligations under the CCAA, is hereby directed and empowered to:

---

<sup>8</sup> ~~Section 11.51(3) provides that the Court may not make this security/charging order if in the Court's opinion the Applicant could obtain adequate indemnification insurance for the director or officer at a reasonable cost.~~

- (a) monitor the Applicant's receipts and disbursements;
- (b) report to this Court at such times and intervals as the Monitor may deem appropriate with respect to matters relating to the Property, the Business, and such other matters as may be relevant to the proceedings herein;
- ~~(c) assist the Applicant, to the extent required by the Applicant, in its dissemination, to the DIP Lender and its counsel on a [TIME INTERVAL] basis of financial and other information as agreed to between the Applicant and the DIP Lender which may be used in these proceedings including reporting on a basis to be agreed with the DIP Lender;~~
- (c) ~~(d)~~ advise the Applicant in its preparation of the Applicant's cash flow statements and reporting required by the DIP Lender, which information shall be reviewed with the Monitor and delivered to the DIP Lender and its counsel on a periodic basis, but not less than [TIME INTERVAL], or as otherwise agreed to by the DIP Lender;
- ~~(e) advise the Applicant in its development of the Plan and any amendments to the Plan;~~
- ~~(f) assist the Applicant, to the extent required by the Applicant, with the holding and administering of creditors' or shareholders' meetings for voting on the Plan;~~
- (d) ~~(g)~~ have full and complete access to the Property, including the premises, books, records, data, including data in electronic form, and other financial documents of the Applicant; to the extent that is necessary to adequately assess the Applicant's business and financial affairs or to perform its duties arising under this Order;
- (e) ~~(h)~~ be at liberty to engage independent legal counsel or such other persons as the Monitor deems necessary or advisable respecting the exercise of its powers and performance of its obligations under this Order; and
- (f) ~~(i)~~ perform such other duties as are required by this Order or by this Court from time to time.

27. ~~25.~~ **THIS COURT ORDERS** that the Monitor shall not take possession of the Property and shall take no part whatsoever in the management or supervision of the management of the Business and shall not, by fulfilling its obligations hereunder, be deemed to have taken or maintained possession or control of the Business or Property, or any part thereof.

28. ~~26.~~ **THIS COURT ORDERS** that nothing herein contained shall require the Monitor to occupy or to take control, care, charge, possession or management (separately and/or collectively, "Possession") of any of the Property that might be environmentally contaminated, might be a pollutant or a contaminant, or might cause or contribute to a spill, discharge, release or deposit of a substance contrary to any federal, provincial or other law respecting the protection, conservation, enhancement, remediation or rehabilitation of the environment or relating to the disposal of waste or other contamination including, without limitation, the *Canadian Environmental Protection Act*, the *Ontario Environmental Protection Act*, the *Ontario Water Resources Act*, or the *Ontario Occupational Health and Safety Act* and regulations thereunder (the "Environmental Legislation"), provided however that nothing herein shall exempt the Monitor from any duty to report or make disclosure imposed by applicable Environmental Legislation. The Monitor shall not, as a result of this Order or anything done in pursuance of the Monitor's duties and powers under this Order, be deemed to be in Possession of any of the Property within the meaning of any Environmental Legislation, unless it is actually in possession.

29. ~~27.~~ **THIS COURT ORDERS** that that the Monitor shall provide any creditor of the Applicant ~~and the DIP Lender~~ with information provided by the Applicant in response to reasonable requests for information made in writing by such creditor addressed to the Monitor. The Monitor shall not have any responsibility or liability with respect to the information disseminated by it pursuant to this paragraph. In the case of information that the Monitor has been advised by the Applicant is confidential, the Monitor shall not provide such information to creditors unless otherwise directed by this Court or on such terms as the Monitor and the Applicant may agree.

30. ~~28.~~ **THIS COURT ORDERS** that, in addition to the rights and protections afforded to the Monitor under the CCAA or as an officer of this Court, the Monitor shall incur no liability or obligation as a result of its appointment or the carrying out of the provisions of this Order, save

and except for any gross negligence or wilful misconduct on its part. Nothing in this Order shall derogate from the protections afforded the Monitor by the CCAA or any applicable legislation.

31. ~~29.~~ **THIS COURT ORDERS** that the Monitor, counsel to the Monitor and counsel to the Applicant shall be paid their reasonable fees and disbursements, in each case at their standard rates and charges, whether incurred prior to, on, or subsequent to the date of this Order, by the Applicant as part of the costs of these proceedings. The Applicant is hereby authorized and directed to pay the accounts of the Monitor, counsel for the Monitor and counsel for the Applicant on a ~~[TIME INTERVAL]~~bi-weekly basis ~~and, in addition, the Applicant is hereby authorized to pay to the Monitor, counsel to the Monitor, and counsel to the Applicant, retainers in the amount[s] of \$● [-, respectively,] to be held by them as security for payment of their respective fees and disbursements outstanding from time to time~~

~~30. — THIS COURT ORDERS that the Monitor and its legal counsel shall pass their accounts from time to time, and for this purpose the accounts of the Monitor and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice or on such other terms as the parties may agree.~~

32. ~~31.~~ **THIS COURT ORDERS** that the Monitor, counsel to the Monitor, ~~if any,~~ and the Applicant's counsel, which for clarity includes all Applicant's counsel such as restructuring counsel and tax counsel, shall be entitled to the benefit of and are hereby granted a charge (the "Administration Charge") on the Property, which charge shall not exceed an aggregate amount of \$●500,000, as security for their professional fees and disbursements incurred at the standard rates and charges of the Monitor and such counsel, both before and after the making of this Order, and both in respect of these proceedings and proceedings in the Tax Court of Canada in respect of the Tax Assessments or similar proceedings. The Administration Charge shall have the priority set out in paragraphs ~~38~~34 and ~~40~~36 hereof.

## **DIP FINANCING**

~~32. — THIS COURT ORDERS that the Applicant is hereby authorized and empowered to obtain and borrow under a credit facility from [DIP LENDER'S NAME] (the "DIP Lender") in order to finance the Applicant's working capital requirements and other general corporate~~

~~purposes and capital expenditures, provided that borrowings under such credit facility shall not exceed \$● unless permitted by further Order of this Court.~~

~~33. — THIS COURT ORDERS THAT such credit facility shall be on the terms and subject to the conditions set forth in the commitment letter between the Applicant and the DIP Lender dated as of [DATE] (the "Commitment Letter"), filed.~~

~~34. — THIS COURT ORDERS that the Applicant is hereby authorized and empowered to execute and deliver such credit agreements, mortgages, charges, hypothecs and security documents, guarantees and other definitive documents (collectively, the "Definitive Documents"), as are contemplated by the Commitment Letter or as may be reasonably required by the DIP Lender pursuant to the terms thereof, and the Applicant is hereby authorized and directed to pay and perform all of its indebtedness, interest, fees, liabilities and obligations to the DIP Lender under and pursuant to the Commitment Letter and the Definitive Documents as and when the same become due and are to be performed, notwithstanding any other provision of this Order.~~

~~35. — THIS COURT ORDERS that the DIP Lender shall be entitled to the benefit of and is hereby granted a charge (the "DIP Lender's Charge") on the Property, which DIP Lender's Charge shall not secure an obligation that exists before this Order is made. The DIP Lender's Charge shall have the priority set out in paragraphs [38] and [40] hereof.~~

~~36. — THIS COURT ORDERS that, notwithstanding any other provision of this Order:~~

~~(a) — the DIP Lender may take such steps from time to time as it may deem necessary or appropriate to file, register, record or perfect the DIP Lender's Charge or any of the Definitive Documents;~~

~~(b) — upon the occurrence of an event of default under the Definitive Documents or the DIP Lender's Charge, the DIP Lender, upon ● days notice to the Applicant and the Monitor, may exercise any and all of its rights and remedies against the Applicant or the Property under or pursuant to the Commitment Letter, Definitive Documents and the DIP Lender's Charge, including without limitation, to cease making advances to the Applicant and set off and/or consolidate any amounts owing by the DIP Lender to~~

~~the Applicant against the obligations of the Applicant to the DIP Lender under the Commitment Letter, the Definitive Documents or the DIP Lender's Charge, to make demand, accelerate payment and give other notices, or to apply to this Court for the appointment of a receiver, receiver and manager or interim receiver, or for a bankruptcy order against the Applicant and for the appointment of a trustee in bankruptcy of the Applicant; and~~

~~(e) — the foregoing rights and remedies of the DIP Lender shall be enforceable against any trustee in bankruptcy, interim receiver, receiver or receiver and manager of the Applicant or the Property.~~

~~37. — THIS COURT ORDERS AND DECLARES that the DIP Lender shall be treated as unaffected in any plan of arrangement or compromise filed by the Applicant under the CCAA, or any proposal filed by the Applicant under the *Bankruptcy and Insolvency Act* of Canada (the "BIA"), with respect to any advances made under the Definitive Documents~~

33. THIS COURT ORDERS that the Monitor and its legal counsel shall pass their accounts from time to time, and for this purpose the accounts of the Monitor and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice.

## VALIDITY AND PRIORITY OF CHARGES CREATED BY THIS ORDER

34. ~~38.~~ **THIS COURT ORDERS** that the priorities of the Directors' Charge, and the Administration Charge and (collectively, the ~~DIP Lender's Charge~~ "Charges"), as among them, shall be as follows<sup>9</sup>:

First ~~—Administration—~~ Administrative Charge (to the maximum amount of \$ ~~●~~ 500,000); and

<sup>9</sup>~~The ranking of these Charges is for illustration purposes only, and is not meant to be determinative. This ranking may be subject to negotiation, and should be tailored to the circumstances of the case before the Court. Similarly, the quantum and caps applicable to the Charges should be considered in each case. Please also note that the CCAA now permits Charges in favour of critical suppliers and others, which should also be incorporated into this Order (and the rankings, above), where appropriate.~~

Second ~~DIP Lender's Charge; and~~

~~Third~~ Directors' Charge (to the maximum amount of \$●165,000).

35. ~~39.~~ **THIS COURT ORDERS** that the filing, registration or perfection of the ~~Directors' Charge, the Administration Charge or the DIP Lender's Charge~~ (collectively, the "Charges") shall not be required, and that the Charges shall be effective as against the Property and shall be valid and enforceable for all purposes, including as against any right, title or interest filed, registered, recorded or perfected subsequent to the Charges coming into existence, notwithstanding any such failure to file, register, record or perfect.

36. ~~40.~~ **THIS COURT ORDERS** that each of the ~~Directors' Charge, the Administration Charge and the DIP Lender's Charge~~ Charges (all as constituted and defined herein) shall constitute a charge on the Property and such Charges shall rank in priority to all other security interests, trusts (including deemed trusts), liens, charges and encumbrances, and claims of secured creditors, statutory or otherwise (collectively, "Encumbrances") in favour of any Person.

37. ~~41.~~ **THIS COURT ORDERS** that except as otherwise expressly provided for herein, or as may be approved by this Court, the Applicant shall not grant any Encumbrances over any Property that rank in priority to, or *pari passu* with, any of the ~~Directors' Charge, the Administration Charge or the DIP Lender's Charge~~ Charges unless the Applicant also obtains the prior written consent of the Monitor, ~~the DIP Lender~~ and the beneficiaries of the ~~Directors' Charge and the Administration Charge~~ applicable Charges, or further Order of this Court.

38. ~~42.~~ **THIS COURT ORDERS** that the ~~Directors' Charge, the Administration Charge, the Commitment Letter, the Definitive Documents and the DIP Lender's Charge~~ Charges shall not be rendered invalid or unenforceable and the rights and remedies of the chargees entitled to the benefit of the Charges (collectively, the "Charges") ~~and/or the DIP Lender~~ thereunder shall not otherwise be limited or impaired in any way by: (a) the pendency of these proceedings and the declarations of insolvency made herein; (b) any application(s) for bankruptcy order(s) issued pursuant to BIA, or any bankruptcy order made pursuant to such applications; (c) the filing of any assignments for the general benefit of creditors made pursuant to the BIA; (d) the provisions of any federal or provincial statutes; or (e) any negative covenants, prohibitions or other similar

provisions with respect to borrowings, incurring debt or the creation of Encumbrances, contained in any existing loan documents, lease, sublease, offer to lease or other agreement (collectively, an "Agreement") which binds the Applicant, and notwithstanding any provision to the contrary in any Agreement:

- (a) ~~neither the creation of the Charges nor the execution, delivery, perfection, registration or performance of the Commitment Letter or the Definitive Documents~~ shall not create or be deemed to constitute a breach by the Applicant of any Agreement to which it is a party;
- (b) none of the Chargees shall have any liability to any Person whatsoever as a result of any breach of any Agreement caused by or resulting from ~~the Applicant entering into the Commitment Letter, the creation of the Charges, or the execution, delivery or performance of the Definitive Documents~~; and
- (c) the payments made by the Applicant pursuant to this Order, ~~the Commitment Letter or the Definitive Documents~~, and the granting of the Charges, do not and will not constitute preferences, fraudulent conveyances, transfers at undervalue, oppressive conduct, or other challengeable or voidable transactions under any applicable law.

39. ~~43.~~ **THIS COURT ORDERS** that any Charge created by this Order over leases of real property in Canada shall only be a Charge in the Applicant's interest in such real property leases.

## **SERVICE AND NOTICE**

40. ~~44.~~ **THIS COURT ORDERS** that the Monitor shall: (i) without delay, publish in ~~[newspapers specified by the Court]~~ The Globe and Mail, National Edition, a notice containing the information prescribed under the CCAA; and (ii) within five (5) days after the date of this Order, (A) make this Order publicly available in the manner prescribed under the CCAA, (B) send, or cause to be sent, in the prescribed manner, a notice to every known creditor who has a claim against the Applicant of more than ~~\$1000~~ \$1,000 (excluding individual employees, and former employees), and (C) prepare a list showing the names and addresses of those creditors and the estimated amounts of those claims, and make it publicly available in the prescribed manner, all in accordance with Section 23(1)(a) of the CCAA and the regulations made thereunder.

41. ~~45.~~ **THIS COURT ORDERS** that the E-Service Protocol of the Commercial List (the “**Protocol**”) is approved and adopted by reference herein and, in this proceeding, the service of documents made in accordance with the Protocol (which can be found on the Commercial List website at [https://www.ontariocourts.ca/scj/files/guides/the\\_guide\\_concerning\\_commercial\\_list\\_e\\_service\\_en.pdf](https://www.ontariocourts.ca/scj/files/guides/the_guide_concerning_commercial_list_e_service_en.pdf)~~https://www.ontariocourts.ca/scj/practice/practice-directions/toronto/e-service-protocol/~~) shall be valid and effective service. Subject to Rule 17.05 this Order shall constitute an order for substituted service pursuant to Rule 16.04 of the Rules of Civil Procedure. Subject to Rule 3.01(d) of the Rules of Civil Procedure and paragraph 21 of the Protocol, service of documents in accordance with the Protocol will be effective on transmission. This Court further orders that a Case Website shall be established in accordance with the Protocol with the following URL ~~“@”~~: <https://www.ksvadvisory.com/experience/case/golddepot> (the “**Website**”).

42. ~~46.~~ **THIS COURT ORDERS** that if the service or distribution of documents in accordance with the Protocol or CCAA is not practicable, the Applicant and the Monitor are at liberty to serve or distribute this Order, any other materials and orders in these proceedings, any notices or other correspondence, by forwarding true copies thereof by pre-paid ordinary mail, courier, personal delivery ~~or~~, facsimile transmission or electronic message (including e-mail) to the Applicant’s creditors or other interested parties at their respective addresses or email addresses as last shown on the records of the Applicant and that any such service or distribution by courier, personal delivery or facsimile transmission shall be deemed to be received on the next business day following the date ~~of~~ forwarding thereof, or if sent by ordinary mail, on the third business day after mailing.

## GENERAL

43. **THIS COURT ORDERS** that any interested party that wishes to amend or vary this Order shall be entitled to appear or bring a motion before this Court to vary or amend this order on not less than seven (7) days’ notice to any other party or parties likely to be affected by the order sought or upon such other notice, if any, as this Court may order.

44. ~~47.~~ **THIS COURT ORDERS** that, notwithstanding paragraph 43 of this Order, the Applicant or the Monitor may, from time to time, apply to this Court to amend, vary or

supplement this Order or for advice and directions in the discharge of ~~its~~their respective powers and duties under this Order or in the interpretation of this Order hereunder.

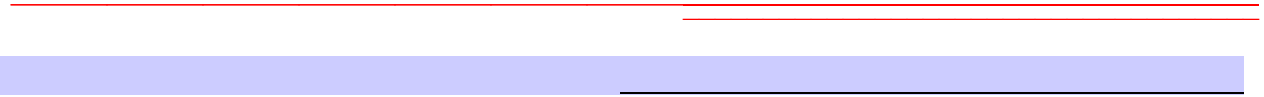
45. ~~48.~~ **THIS COURT ORDERS** that nothing in this Order shall prevent the Monitor from acting as an interim receiver, a receiver, a receiver and manager, or a trustee in bankruptcy of the Applicant, the Business or the Property.

46. ~~49.~~ **THIS COURT HEREBY REQUESTS** the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States, to give effect to this Order and to assist the Applicant, the Monitor and their respective agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Applicant and to the Monitor, as an officer of this Court, as may be necessary or desirable to give effect to this Order, to grant representative status to the ~~Monitor~~Applicant in any foreign proceeding, or to assist the Applicant and the Monitor and their respective agents in carrying out the terms of this Order.

47. ~~50.~~ **THIS COURT ORDERS** that each of the Applicant and the Monitor be at liberty and is hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Monitor is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

~~51. — THIS COURT ORDERS that any interested party (including the Applicant and the Monitor) may apply to this Court to vary or amend this Order on not less than seven (7) days notice to any other party or parties likely to be affected by the order sought or upon such other notice, if any, as this Court may order.~~

48. ~~52.~~ **THIS COURT ORDERS** that this Order and all of its provisions are effective as of 12:01 a.m. ~~Eastern Standard/Daylight~~(Toronto Time) on the date of this Order without the need for entry or filing.



---

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF 999 GOLD DEPOT (CANADA) LIMITED

Court File No: BK-26-03367471-0031

ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)

PROCEEDING COMMENCED AT TORONTO

INITIAL ORDER

CHAITONS LLP  
Barristers and Solicitors  
5000 Yonge Street, 10<sup>th</sup> Floor  
Toronto, ON M2N 7E9

Harvey Chaiton (LSO No. 21592F)  
Tel: (416) 218-1129  
E-mail: harvey@chaitons.com

Danish Afroz (LSO No. 65786B)  
Tel: (416) 218-1137  
E-mail: dafroz@chaitons.com

Lawyers for the Applicant

Document comparison by Workshare Compare on Tuesday, July 7, 2026 9:41:21 PM

Input:	
Document 1 ID	file:///C:/Users/HMcHenry/OneDrive - Chaitons LLP/Desktop/New 999 Gold\intitial-order-ccaa-en.doc
Description	intitial-order-ccaa-en
Document 2 ID	file:///C:/Users/HMcHenry/OneDrive - Chaitons LLP/Desktop/New 999 Gold\CCAA Initial Order - 999 Gold (4).docx
Description	CCAA Initial Order - 999 Gold (4)
Rendering set	Standard

Legend:	
	<u>Insertion</u>
	<del>Deletion</del>
	<del>Moved from</del>
	<u>Moved to</u>
	Style change
	Format change
	<del>Moved deletion</del>
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

<b>Statistics:</b>	
	Count
Insertions	297
Deletions	282
Moved from	7
Moved to	7
Style changes	0
Format changes	0
Total changes	593