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# Professional Development Seminar

**The Jewish Community Foundation of Montreal**



**La Fondation communautaire juive de Montréal**

**Conférence de  
perfectionnement professionnel**

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**Wednesday, June 10, 2009**

**Mercredi 10 juin 2009**

## The case

**Clients: John & Ethel Cohen (aged 68, 65)**

- John suffered substantial losses in the market and realized sufficient losses to carryback against gains. He wishes to sell other “losers”.
- John has operated a business entitled “Cohen Realities Ltd”. The Company is an active leasing company and John’s son, Arthur, is the Chief Operator. John and Ethel have two other children, June, a lawyer living in Toronto and George, a consultant living in Philadelphia.

# The case...continued

- Cohen Realities Ltd has been successful over the years, accumulating retained earnings and an array of portfolio investments. The business and investments have suffered in the financial crisis although the marketable securities, as they have been held for a long-period, are still worth more than their cost.
- John owns 12,000,000 retractable preferred shares of Realities with the 3 children via a discretionary trust owning the common shares. John's shares were issued a year ago in an estate freeze.
- John, prior to the financial crisis, was contemplating setting up a foundation at the Jewish Community Foundation.