

Your file    Votre référence

BY REGISTERED MAIL

Our file    Notre référence

The Golden Horse-shoe Christian Youth Centre Inc.  
P.O. Box 100  
Milton, Ontario  
L9T 2Y3

19151  
Tel. (613) 954-1362

Attention: Mr. Ken Campbell  
President

JUL 10 1996

Dear Mr. Campbell:

Re: THE Golden Horse-shoe Christian Youth Centre Inc.

I refer to the Department's letter of May 16, 1996, requesting your additional representations as to why the Minister of National Revenue should not revoke the registration of The Golden Horse-shoe Christian Youth Centre Inc. (the "Centre") in accordance with subsection 168(2) of the *Income Tax Act* (the "Act").

We have reviewed additional representations made on your behalf by Mr. George Smith in a letter dated June 28, 1996. We must advise that these representations do not alleviate our concerns as outlined in our letters to the Centre dated September 19, 1995 and May 16, 1996, copies attached.

We have determined that the Centre has devoted in excess of ten percent of its resources to ancillary and incidental political advocacy activities and has allowed its resources to be used for partisan politics. As a result, we have concluded that the Centre has failed to meet the prerequisite of subsection 149.1(6.2) of the Act and has not devoted all of its resources to charitable activities as required pursuant to subsection 149.1 of the Act.

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**CONCLUSION**

I wish to advise you that for the reasons outlined above and pursuant to the authority granted to the Minister in subsection 168(1) of the Act and delegated to me in subsection 900(8) of the Regulations to the Act, I propose to revoke the registration of The Golden Horse-Shoe Christian Youth Centre Inc. By virtue of subsection 168(2) of the Act, the revocation will be effective on the date of publication in the *Canada Gazette* of the following notice:

Notice is hereby given, pursuant to paragraph 168(1)(b) of the *Income Tax Act*, that I propose to revoke the registration of the charity listed below and that the revocation of registration is effective on the date of publication of this notice.

0280909-49 The Golden Horse-Shoe Christian Youth Centre Inc.  
Milton, Ontario

Should you wish to appeal this notice of intention to revoke the charity registration in accordance with subsections 172(3) and 180(1) of the Act, you are advised to file a notice of appeal with the Federal Court of Appeal within 30 days from the mailing of this letter. The address of the Federal Court of Appeal is:

Supreme Court Building  
Wellington Street  
Ottawa, Ontario  
K1A 0H9

As of the date of revocation of the registration of the Centre, which is the date upon which the above-noted notice is published in the *Canada Gazette*, the Centre will no longer be exempt from Part 1 Tax as a registered charity and will no longer be permitted to issue official donation receipts.

Additionally, the Centre may be subject to tax exigible pursuant to Part V, section 188 of the Act. For your reference, I have attached a copy of the relevant provisions of the Act concerning revocation of registration and the tax applicable to revoked charities as well as appeals against revocation.

I wish to advise you that pursuant to subsection 150(1) of the Act, a return of income for each taxation year in the case of a corporation (other than a corporation that was a registered charity throughout the year) shall without notice or demand therefor, be filed with the

Minister in prescribed form containing prescribed information. Also we draw your attention to paragraph 149(1)(1) which states the definition of a non-profit organization and subsection 149(12) which states the filing requirements of a non-profit organization.

Yours truly,

A handwritten signature in black ink, appearing to read 'R.A. Davis', with a long, sweeping horizontal flourish extending to the right.

R.A. Davis, CGA  
Director  
Charities Division

**Attachments**