

# Barossa Tax Convention



📅 5-7 Aug 2026

★ CPD 12

## The Tax Institute gratefully acknowledges the generous assistance of members of the Organising Committee:

Daniel Marateo, Cowell Clarke (Chair, Barossa Convention Organising Committee)

Lisa Christo, NDA Law

Antony Delo, William Buck

Briony Hutchens, CTA, Finlaysons

Lee Jurga, CTA, Perks

Angie King, CTA, Australian Taxation Office

Sonia Mascolo, CTA, Bentleys

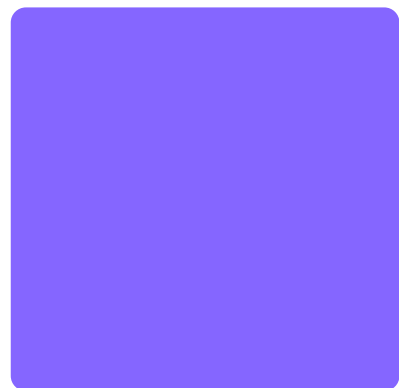
Alexandra Nicola, Thomson Geer Lawyers

Jessica Pengelly, CTA, Pengelly & Co Legal

Nicole Peterson, CTA, PKF Adelaide

George Sinanis, Grant Thornton

## Proudly supported by:



# Welcome

## Trust No One? Navigating Trust Issues in Tax

I am pleased to invite you to join us in the scenic and historic Barossa Valley for The Tax Institute's 2026 Barossa Convention—a leading event in South Australia for tax professionals from SA and around the nation.

In today's environment, the tax landscape can sometimes feel like a high-stakes intelligence operation—complex, fast-changing, and often opaque. Tax practitioners are increasingly required to follow broad policy changes but also the faintest lines of inquiry down any number of rabbit holes, questioning assumptions, interrogating positions, and navigating layers of legislation, regulations and revenue authority pronouncements.

This year's theme, "Trust No One? Navigating Trust Issues in Tax" recognises the current environment – a Federal Government set on enacting sweeping changes to, amongst other things, the taxation of trusts and capital gains, as well an environment of heightened ATO and state revenue office scrutiny of taxpayers' affairs. It sets the tone for a program that challenges conventional thinking and sharpens professional judgement. Over the course of the Convention, delegates can gain up to 12 CPD hours through a series of expertly curated sessions designed to strengthen both technical capability and strategic insight.

I would also like to take this opportunity to thank our esteemed speakers, who have generously contributed their time and expertise to deliver a high-quality and engaging program.

## A premier program for tax professionals

This year's program has been carefully developed by the Convention Organising Committee to address key areas of risk, reform, and practical application. Delegates will have an opportunity to explore amongst peers the developments coming out of the 2026/27 Federal Budget. There will be opportunities to consider strategies for avoiding family disputes involving trusts, unpack emerging ATO and revenue authority risk areas. The program also places a strong focus on property and GST, with dedicated sessions examining ATO updates, development pitfalls, and the application of the main residence exemption. Other policy and legislative developments are also in focus, an analysis of the relevance of purpose in applying the tax laws, and planning for the new Division 296 superannuation earnings tax.

In addition, sessions will cover ATO hot topics, state tax considerations, and practical strategies for managing family trust distribution tax, ensuring delegates leave with both technical clarity and actionable insights.

## Unique industry networking and idyllic destination

We are delighted to return to the Novotel Barossa Valley Resort, set amidst rolling vineyards and picturesque countryside. On Wednesday evening, join fellow delegates for an engaging evening of informal networking. The Convention dinner, to be held at Gomersal Winery, offers another excellent opportunity to connect with peers and speakers in a relaxed and memorable setting.

The Barossa Valley also provides the perfect backdrop to extend your stay—whether exploring renowned cellar doors, enjoying gourmet dining, or taking part in leisure activities such as golf, cycling, or hot air ballooning.

Secure your place today and take advantage of early bird pricing.

I look forward to welcoming you to the Barossa Convention as we uncover insights, challenge assumptions, and navigate the complexities of tax practice in today's evolving landscape. In the world of tax, who can you trust?



**Daniel Marateo**  
Chair, Barossa Convention Organising Committee



**Early bird pricing offer**  
**Register on or before Friday,**  
**10 July 2026 to save!**

# Technical program

**Day 1**      Wednesday, 5 August 2026

| Time          | Session           |
|---------------|-------------------|
| From 6:45pm   | Registration      |
| 7:00 – 9:00pm | Welcome Reception |



## Welcome Reception

Step into the world of intrigue and espionage – Dress to impress as a sophisticated spy, undercover agent, or master detective. Whether you channel sleek sophistication or covert operations, this is your chance to embrace the theme and keep everyone guessing.

Join us at the Novotel Barossa Valley Resort for an evening of drinks and grazing, where you can connect with fellow delegates and our esteemed speakers in a setting designed for conversation, connection, and a touch of mystery.

**Date:** Wednesday, 5 August 2026

**Time:** 7:00–9:00pm

**Venue:** Novotel Barossa Valley Resort

**Price:** Inclusive for all full registration delegates  
Additional tickets are \$80 per person, see registration form for details

**Dress:** Business casual

# Technical program

## Day 2 Thursday, 6 August 2026

| Time           | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8:00 – 8:30am  | Registration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8:30 – 8:45am  | <b>Welcome and President's Address</b><br>Speakers: Daniel Marateo, Barossa Convention Chair; Tim Sandow, CTA, President, The Tax Institute                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 8:45 – 9:45am  | <b>Session 1: Elementary ... or is it? A Sherlock Holmes approach to navigating an evolving and complex tax system</b><br>Speaker: Elizabeth Bishop SC, FTI, Ground Floor Wentworth Chambers<br><br>Advisers looking to assist their clients facing growing regulatory scrutiny and increasingly complex tax settings, must critically assess information, structures, assumptions and historical positions.<br><br>This keynote will explore risk areas and emerging dispute trends, and provide key case insights and practical takeaways to help advisers identify issues and manage uncertainty more effectively.<br><br>The session will interrogate how an investigative mindset may assist clients in managing family trust elections; in payroll tax and contractor issues; and in understanding trends in tax disputes and regulator behaviour.                                                                                                                                                                                                                                                                                                  |
| 9:45 – 10:45am | <b>Session 2: Inside the Policy Brief: Tax Reform in Motion</b><br>Speaker: David Montani, CTA, Grant Thornton<br><br>In this presentation, Tax Wars author David Montani will explore the key tax and policy themes emerging from the 2026 Federal Budget, providing practical insights into what the latest developments mean for practitioners, their clients, and the broader Australian economy. <ul style="list-style-type: none"><li>• 2026 Budget – Blinder or off the side of the boot?</li><li>• Capital gains tax (CGT) discount – Current considerations and implications<ul style="list-style-type: none"><li>– Minimum tax rate on trusts – the practical implications</li></ul></li><li>• What do the proposed changes mean for practitioners and clients?</li><li>• Impact on housing supply – Is the effect limited to real estate?<ul style="list-style-type: none"><li>– Negative gearing – residential property and beyond</li></ul></li><li>• What defines good and bad tax policy, and a broader look at Australia's tax policy landscape</li><li>• Future policy directions and developments from the Board of Taxation.</li></ul> |

# Technical program

**Day 2** Thursday, 6 August 2026 continued

| Time            | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10:45–11:00am   | <p><i>This session is proudly sponsored by Accountancy Insurance</i></p> <p><b>Inside the Files: ATO &amp; Revenue Authority Claim Trends 2025–26</b></p> <p>Speaker: Vicky Shah, Accountancy Insurance</p> <p>This session provides a practical, data driven insight into current claim activity affecting accounting practices, drawing on real submissions from Accountancy Insurance clients. It will examine how claim trends are evolving, and what this means for accounting firms and their clients.</p> <p>Key topics include:</p> <ul style="list-style-type: none"><li>• Overview of recent claim activity involving the ATO and State Revenue Authorities</li><li>• Analysis of claim frequencies across different tax types over defined periods</li><li>• The top three emerging claim trends identified from Accountancy Insurance client data.</li></ul>                                                                                                                                                     |
| 11:00–11:30am   | <p><b>Morning Tea</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11:30am–12:30pm | <p><b>Session 3: Licence to Challenge: Avoiding Family Disputes in Trusts</b></p> <p>Speakers: Carlie Frantzis, Cowell Clarke; Peter Slegers, CTA, Cowell Clarke</p> <p>With the ongoing accumulation and transition of significant wealth held in trust structures to the next generation, family disagreements and disputes involving trusts are becoming increasingly common.</p> <p>This session will focus on the key sources from which family disputes involving trusts arise, and importantly tips for advisers in assisting their clients in pre-empting and avoiding those disputes. Topics covered will also include:</p> <ul style="list-style-type: none"><li>• Proper exercise of trustee's discretion – Lessons from <i>Owies v JJE Nominees Pty Ltd [2022] VSCA 142</i></li><li>• Trustee duties – What can a disgruntled family member attack?</li><li>• Disputes concerning appointorships and changes in trustee</li><li>• Promises and representations</li><li>• Family provision claim risks.</li></ul> |

# Technical program

## Day 2 Thursday, 6 August 2026 continued

| Time         | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| 12:30–1:00pm | <p><b>Session 4: ATO Update: Morton and Property Development Risk Areas</b><br/>Speaker: Nicholas Bell, Australian Taxation Office</p> <p>Ensuring correct income tax and GST treatment for property development activities, and the disposal of real property, continues to be an area of focus for the ATO. This concise session considers the recent decision in <i>Commissioner of Taxation v Morton</i> [2026] FCAFC 31 and discusses the types of activities that continue to attract the ATO's attention.</p> <p>Key messages:</p> <ul style="list-style-type: none"><li>• Characterisation of activities – when development moves beyond mere realisation</li><li>• Main residence exemption – common errors when applying the exemption</li><li>• GST risks – application of the margin scheme and GST at settlement</li><li>• ATO horizon – emerging risk areas and compliance focus for property development.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1:00–2:00pm  | Lunch                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2:00–3:30pm  | <p><b>Session 5: The Property Files: GST &amp; Development Traps Revealed</b><br/>Speaker: Thomas Aitkenhead, Hoffman Kelly</p> <p>With continued pressure on housing supply and affordability, landholders are continuing to explore opportunities for undertaking subdivision and development of their land. These activities range from small subdivisions undertaken by the landholder themselves to large scale broad acre subdivisions typically undertaken by (or with the assistance of) land developers. In both cases, there are a number of tax issues that arise that need to be carefully navigated.</p> <p>This session will use case studies to explore the different tax issues that arise from both the taxpayer and ATO perspective in respect of property development activities, both when undertaking the typical knockdown and subdivide scenario as well as in relation to large scale broad acre developments, including:</p> <ul style="list-style-type: none"><li>• When activities are likely to be more than the mere realisation of a capital asset, taking into account the recent decision of <i>Commissioner of Taxation v Morton</i> [2026] FCAFC 31.</li><li>• Maximising the main residence exemption and common mistakes when applying the exemption in the context of property subdivisions.</li><li>• GST issues including:<ul style="list-style-type: none"><li>– Whether the landowner is considered to be carrying on an enterprise and, if so, from when</li><li>– GST withholding for new residential premises</li><li>– Application of the margin scheme</li></ul></li><li>• Structuring of large scale broad acre developments, including:<ul style="list-style-type: none"><li>– Retention of land by the landowner vs sale of land to a developer</li><li>– Timing issues that can arise for land owners in relation to crystallisation of tax liabilities</li><li>– Impact of structure on application of income tax and GST provisions</li></ul></li><li>• Additional tax issues that arise in structures involving multiple investors.</li></ul> |
| 3:30–4:00pm  | Afternoon Tea                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

# Technical program

## Day 2 Thursday, 6 August 2026 continued

| Time         | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 4:00–5:00pm  | <p><b>Session 6: Division 296: Decoding the \$3M Threshold</b><br/>Speaker: Shaun La Motte, RSM Australia; Bradley Loftus, RSM Australia</p> <p>Division 296 represents another significant change to the superannuation regime. In this session our speakers will explore:</p> <ul style="list-style-type: none"><li>• What is Division 296?</li><li>• How does it apply? When does it apply? What are realised earnings?</li><li>• What are the transitional measures?</li><li>• How does Division 296 apply in the context of a member death?</li><li>• How is the total superannuation balance calculated? What are the cost base calculations and adjustments to be undertaken?</li><li>• What are the planning opportunities which can arise for advisers in preparing for Division 296? Can clients undertake contributions/withdrawals, valuations, asset transfers, other restructuring opportunities?</li><li>• Is the client better off with investing their monies in a different structure outside of superannuation?</li><li>• Practical case study and scenario analysis to present the modelling of taxation outcomes under Division 296 and where those monies are held outside of superannuation.</li></ul> |
| 5:00–6:45pm  | Free Time                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 6:45pm       | Bus Departs for Dinner                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 7:00–10:00pm | Convention Dinner                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10:00pm      | Bus Departs for Novotel Barossa Valley Resort                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |



### Convention Dinner

Join your colleagues, peers and our esteemed presenters for an evening of fine dining and networking. Held at Gomersal Winery located in the picturesque location, nestled in the heart of the Barossa, Gomersal Wines brings rustic, country elegance to life.

**Date:** Thursday, 6 August 2025

**Time:** 7:00–10:00pm

**Venue:** Gomersal Winery

**Price:** Inclusive for all full registration delegates  
Additional tickets are \$200 per person, see registration form for details

**Dress:** Dress to impress and make an entrance, with cocktail attire or spy-inspired ensembles encouraged. Think sleek suits, elegant evening wear, or a touch of covert sophistication worthy of a master of intrigue.

# Technical program

## Day 3 Friday, 7 August 2026

| Time          | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8:45–9:30am   | <p><b>Session 7: The Latest in Tax Policy and Advocacy</b><br/>Speaker: Julie Abdalla, FTI, The Tax Institute</p> <p>The Tax Institute's Tax Policy and Advocacy (TPA) team continues to focus on educating, and advocating with and on behalf of, our members. The session will cover:</p> <ul style="list-style-type: none"><li>• The latest advocacy activities of the TPA team and The Tax Institute's National Technical committees</li><li>• Key advocacy matters affecting our members</li><li>• The progress of key announced but unenacted measures (ABUMs).</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 9:30–10:30am  | <p><b>Session 8: The World is Not Enough: <i>Bendel</i> and the Limits of the Commissioner's View</b><br/>Speakers: Fiona Dillon, CTA, Australian Taxation Office, Paul Tanti, CTA, Thomson Geer</p> <p>This session will provide a concise overview of the key developments arising from <i>Commissioner of Taxation v Bendel [2025] FCAFC 15</i>, including the implications of the decision, the ATO's current position and any decision impact statements. The discussion will include:</p> <ul style="list-style-type: none"><li>• A breakdown of the key take aways from the High Court of Australia's (HCA) decision in <i>Commissioner of Taxation v Bendel [2025] FCAFC 15</i></li><li>• The ATO's position/opinion on the HCA decision in <i>Bendel [2025]</i></li><li>• Any decision impact statement released by the ATO on the HCA decision</li><li>• Whether s 100A or Part IVA can apply to the facts and circumstances of <i>Bendel [2025]</i></li><li>• Whether s 100A or Part IVA can apply to scenarios where Division 7A was previously applied (i.e. UPEs)</li><li>• Any concessional ATO treatment if the Commissioner loses the <i>Bendel [2025]</i> decision?<ul style="list-style-type: none"><li>– Prior UPEs treated or not treated as loans by taxpayers.</li><li>– Administrative way forward?</li></ul></li></ul> |
| 10:30–11:00am | Morning Tea                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |



# Technical program

## Day 3 Friday, 7 August 2026 continued

| Time            | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 11:00am–12:00pm | <p><b>Session 9: The Analysis of Purpose in Tax Legislation</b><br/>Speaker: Sam Ure, FTI, Jeffcott Chambers</p> <p>There have been some interesting recent cases about this. When legislation makes purpose determinative, the question often arises whether the relevant purpose is the taxpayer's actual purpose or a purpose objectively determined.</p> <p>In the background, we know there is a purpose analysis in Part IVA shaped by the 177D factors; but a different analysis applies for scheme benefits identified elsewhere in the income tax law: <i>BBlood Enterprises Pty Ltd v Commissioner of Taxation</i> [2022] and <i>Federal Commissioner of Taxation v Ludekens &amp; Anor</i>.</p> <p>In the past year, the High Court has considered questions about the analysis and has arrived at different conclusions about NSW land tax legislation in <i>Godolphin Australia Pty Ltd v Chief Commissioner of State Revenue</i> [2024] HCA 20, and the GST Act in <i>Automotive Invest</i> [2024] HCA 36. In <i>Automotive Invest</i> [2024] there is an illuminating discussion of when a reasonable person test can be recruited in the analysis of purpose. AND the majority endorses a tripartite analytical framework of means, ends or purposes, and motive.</p> |
| 12:00–1:00pm    | <p><b>Session 10: Crossing Borders: The State Tax Playbook</b><br/>Speaker: Nicholas McCann, WRP Legal; Lucy Simeoni, WRP Legal</p> <p>State taxes continue to present evolving challenges for advisers and taxpayers in South Australia.</p> <p>This session will provide a practical update on recent developments and emerging issues in the state tax landscape, and will cover:</p> <ul style="list-style-type: none"><li>• Current and emerging trends in State Taxes</li><li>• Deep dive into Landholder Duty</li><li>• Differences between Foreign-owner Surcharges across different states and territories</li><li>• When a deed of variation of trust deed triggers a resettlement for Stamp Duty purposes.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1:00–2:00pm     | Lunch                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

# Technical program

## Day 3 Friday, 7 August 2026 continued

| Time        | Session                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2:00–3:00pm | <p><b>Session 11: Property Under Surveillance with The Main Residence Exemption</b></p> <p>Speakers: Paul Dimasi, CTA, Nexia Edwards Marshall; Karen Gregor, CTA, Nexia Edwards Marshall</p> <p>Through case studies we will break down the technical requirements, highlight common pitfalls, and provide clear guidance to assist in application of the exemption. Key Topics include:</p> <ul style="list-style-type: none"><li>• Calculating full vs partial Main Residence exemptions</li><li>• Managing the absence rules and income producing use</li><li>• Life Interest and Testamentary Trusts</li><li>• Granny flat arrangements.</li><li>• Transitioning to aged-care or involving family in property arrangements</li><li>• Common ATO audit focus areas</li><li>• Practical scenarios, tips, and recent guidance</li><li>• Identify risk areas where the exemption may not apply as expected.</li></ul>                                                                                                                                                                                                                                                                                                                                                                         |
| 3:00–4:00pm | <p><b>Session 12: Navigating The 47% Trap: Strategies for Managing Family Trust Distribution Tax</b></p> <p>Speaker: Simon How, CTA, Bentleys</p> <p><i>“The name’s Bond. James Bond.”</i></p> <p><i>“Yeah, and I’m [the ATO] and you’re still under arrest.”</i></p> <p>When Mr Bond innocently chose his daughter as the test individual for his family trust election (FTE) he didn’t realise the trouble he would be getting into. Unknowingly, the KGB had already made a covert election with nemesis as the test individual and now he is up for millions of dollars in unpaid family trust distributions tax (FTDT).</p> <p>Join us for a practical session on FTEs to help you manage your client’s issues such as those faced by Mr Bond. This will include:</p> <ul style="list-style-type: none"><li>• The limitations of the family control test</li><li>• Managing invalid “KGB” elections</li><li>• The ATO hard-line ‘no discretion’ interpretation in relation to FTDT</li><li>• The interaction with franking deficits tax</li><li>• General Interest Charges on unpaid debts</li><li>• The 2026 Amnesty &amp; Voluntary Disclosure.</li></ul> <p>This session will give you the tools necessary to review and manage family trust elections within your client groups.</p> |
| 4:00–4:30pm | <b>Closing Address Followed by Afternoon Tea</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

# Presenters

**Julie Abdalla, FTI**, is the Head of Tax & Legal at The Tax Institute. Julie has practiced in the tax teams of Big 4 and top tier law firms in Sydney and Melbourne, and at an international law firm in London. She has expertise in law and policy across a broad range of taxes and industry sectors. Julie is driven to achieve holistic tax reform, and has the depth of knowledge to advocate for members and the betterment of the tax system. Julie leads the Tax Policy & Advocacy team and has oversight of The Tax Institute's National Technical and State Taxes Committees comprised of over 150 volunteers. She represents The Tax Institutes in several external forums including the ATO's National Tax Liaison Group and the Australian Treasury's Tax Treaty Advisory Panel. Julie provides strategic and technical advice to Government and other stakeholders, and has appeared as an expert witness in several Senate Committee inquiries. Julie has been recognised throughout the profession for her leadership and excellence in tax. She has been awarded a number of scholarships and awards including the International Bar Association Taxes Committee Scholarship, the Australian Lawyers Weekly 30 Under 30 Award in

Tax, and a prize from the University of Oxford. Julie holds a Bachelor of Arts and a Juris Doctor from the University of Sydney, and a Master of Laws from the University of Melbourne, part of which was completed at the University of Oxford.

**Thomas Aitkenhead** is a Chartered Accountant and Director at Hoffman Kelly. Tom has degrees in Commerce and Law and has over 20 years' experience in public practice providing structuring and taxation solutions for SME businesses. Tom has a special interest in the property industry and its ever-changing and complex nature. He enjoys finding practical solutions for his clients.

**Nicholas Bell** started his career in the Australian Taxation Office (ATO) in 2007, working his way through various income tax roles, primarily focussed on privately owned and wealthy groups population and their advisers. Since 2017, Nicholas has held senior leadership positions in Compliance, Risk & Strategy, and Project Management within the Private Wealth (PW) business line in the Tax Avoidance Taskforce Trusts Program (Trusts Program). In his current role as Acting Assistant Commissioner, Nicholas has national responsibility for the Trusts Program Risk & Strategy, Engagement &

Assurance teams, and the delivery and implementation of Modernisation of Tax Administration Systems (MTAS) project across the ATO. In addition, he leads the Property and Construction Risk & Strategy team.

**Elizabeth Bishop SC, FTI**, is a Barrister who advises and represents resident and non-resident clients, high wealth individuals, private groups, corporates, revenue authorities and Federal and State government bodies in the ART, NSW Supreme Court, Federal Court and High Court of Australia. She has developed a practice predominantly in matters concerning land tax, payroll tax, stamp duty, income tax, goods and services tax, capital gains tax as well as disciplinary investigations and disputes against tax agents. She is also a Senior Member at the New South Wales Civil and Administrative Tribunal hearing appeals from all divisions and complaints against legal practitioners and health professionals.

**Fiona Dillon, CTA**, is the ATO's Chief Tax Counsel, accountable for the ATO's public advice and guidance, litigation, and resolving the ATO's most significant tax technical issues. Fiona previously served as Minister-Counsellor (Taxation) in the Australian delegation to the OECD based

in Paris and spent a number of years in private practice. Fiona is an admitted Australian legal practitioner and holds a Bachelor of Commerce, Bachelor of Laws with Honours, and a Master of Taxation.

**Paul Dimasi, CTA**, is a Business Consulting Services Partner at Nexia Edwards Marshall and current chair of the Property & Construction group for the firm. He has over 15 years' experience in taxation and accounting services to small, medium and large businesses, with considerable experience in the property and construction industry.

**Carlie Frantzis** is an Associate in Cowell Clarke's Tax and Revenue group. Carlie assists in advising on Federal income tax and State revenue law issues, as well as trust law issues. Carlie has been involved in effecting group restructures, obtaining ATO private binding rulings and assisting in ATO reviews and audit matters. Carlie has developed a particular interest in group restructures and the associated succession planning with private trusts.

**Karen Gregor, CTA**, is a Tax Director in Nexia Edwards Marshall's Business Consulting and Taxation Divisions. Karen has over 25 years' experience advising clients across many areas and has helped many clients deal with difficult areas

# Presenters

of taxation law, including GST and CGT, working with them to find a solution, even when the legislation is ambiguous. She works with clients throughout the life cycle of their business by advising them during its establishment and operation, then, if necessary, working on exit strategies and winding up.

**Simon How, CTA**, is a tax consulting partner at Bentleys SA. Simon provides specialist taxation advice with a focus on clients in the SME & International market. Simon regularly provides advice on tax aspects of deals, structuring and restructuring groups with a particular focus on tax consolidation and CGT outcomes. Simon has 30 years experience in public practice and with the ATO and is a regular contributor to The Tax Institute and other relevant bodies.

**Shaun La Motte** is a Director at RSM Australia, specialising in SMSF and strategic advisory for high-net-worth individuals, SMEs and business owners. He focuses on structuring, protecting and growing wealth through tailored superannuation and estate planning strategies. With deep technical expertise and a commercial mindset, Shaun simplifies complex rules into practical, client-focused

solutions. He provides advice across SMSF compliance, succession planning and legislative change, helping clients stay ahead and make informed decisions.

**Brad Loftus** is a Partner at RSM Australia. With over 20 years' experience in the accounting industry, Brad Loftus supports clients through every stage of business, from start-up to retirement. He works across a broad range of sectors, with particular expertise in childcare and agribusiness, delivering tailored, practical solutions through careful analysis of business structures. His expertise spans strategic reviews, structuring, acquisitions, tax compliance and business advisory.

**Nicholas McCann** is a Senior Associate at WRP Legal & Advisory. He has a Bachelor of Laws (Honours) and a Bachelor of Commerce (Honours), majoring in Accounting, from the University of Adelaide. Nicholas has extensive experience in taxation advisory as well as tax dispute resolution and lodging submissions with federal and state revenue authorities. Nicholas regularly advises on commercial transactions, in particular taxation planning and structuring, asset acquisitions and disposals, taxation

compliance, not-for-profit organisations, restructures and transactional advice. Nicholas works with senior and junior practitioners and other professional advisors to provide advice on a wide range of corporate, commercial and taxation issues (at both federal and state level), to a broad range of clients including private high-net-worth individuals, family groups, large companies (including ASX listed companies) and not-for-profit organisations. Nicholas is also a member of the Law Society of South Australia and the Golden Key International Honour Society (Law and Commerce). In addition to his role at WRP Legal & Advisory, Nicholas tutors Financial Accounting in the Adelaide University Business School.

**David Montani, CTA**, is National Head of Technical Tax – Private Enterprise at Grant Thornton. He has over 30 years' experience in specialist tax advisory and is the author of Tax Wars: The bluster, bulldust and bedlam behind Australia's tax reform gridlock.

**Lucy Simeoni** is a Director at WRP Legal. She specialise in commercial tax, Lucy advises clients on income and capital gains tax, GST, stamp duty, payroll tax, and state and federal taxation

disputes. She works with a diverse client base, from small enterprises to large private businesses and high-net-worth individuals, with notable expertise in the pharmacy and retirement village sectors. Her skillset extends to business structuring, restructuring, acquisitions, and sales. A recognised specialist in charities and not-for-profit law, she also provides strategic advice on corporate, commercial, trust, and partnership matters. She is a member of The Tax Institute SA State Council and chair of The Tax Institute Women in Tax Committee.

**Vicky Shah** is the Associate Director at the Accountancy Insurance. He obtained his MBA at Swinburne University of Technology. He commenced working with Accountancy Insurance in early 2011 and is instrumental in driving growth and expanding the company's reach within the accounting sector. He leverages his extensive knowledge of tax audit insurance and professional indemnity insurance to offer tailored solutions that meet the unique needs of accounting firms. His expertise and dedication to customer service have been pivotal in enhancing client satisfaction and fostering strong business relationships across Australasia.

# Presenters

**Peter Slegers, CTA**, heads Cowell Clarke's Tax & Revenue, Superannuation and Private Client practice groups. Peter advises and acts for a wide range of public and private companies and high net worth individuals and families. Peter's areas of expertise include income tax (as it impacts on business and high net worth clients), capital gains tax, goods and services tax, state taxes, trust law and superannuation law. Peter has published numerous papers on trust structures and has considerable experience in this area. Peter is also a co-author of the Tax Institute's SMSF Income Stream Guide and Cowell Clarke's Australian Agribusiness Advisers' Guide.

**Paul Tanti, CTA**, is a partner in the Thomson Geer Tax Section and has a broad range of experience in providing specialist taxation and commercial advice to a wide variety of clients. His broad base of clients includes legal and accounting firms, private and listed companies, high net worth individuals, and private equity funds. Paul advises on all areas of Federal and State taxation law and related commercial matters. Paul is a regular speaker on tax and related commercial matters for various professional bodies. He is a member of The Tax Institute, a member of the Law Council of Australia's Business Law

Committee (South Australian Tax Sub Committee), and a member of the South Australian State Taxes Liaison Group.

**Sam Ure, FTI**, is a barrister practising in tax, trusts and superannuation. Sam has appeared in numerous State and Federal tax cases. He has advised both taxpayers and revenue authorities in many reviews and audits. Sam also practises in commercial disputes, administrative law and regulatory proceedings.



# Venue and accommodation



## Novotel Barossa Valley Resort

42 Pioneer Avenue, Rowland Flat, Barossa Valley

The Novotel Barossa Valley Resort located in the Barossa Valley district, is set in a natural amphitheatre overlooking Jacob's Creek. The guest rooms all feature private balconies and views of the Barossa Ranges. Both comfort and functionality are assured with iPod docking stations, connecting directly to 32-inch LCD TVs, pay TV channels, in-house movies, comfortable workstations, including ergonomic chairs and broadband access, a large chaise lounge to stretch out on and individually controlled air-conditioning.

An accommodation block has been reserved for delegates at the Novotel Barossa Valley Resort. Favourable room rates have been negotiated and room rates are quoted on a per-person, per-night basis (inclusive of GST) and include breakfast. These favourable room rates have been extended from Tuesday (4 August) to Saturday (8 August).

**Rooms are limited and must be booked prior to 10 July 2026.** All accommodation bookings must be made directly with the venue via the self-book weblink [here](https://www.barossa.com/visit/accommodation/).

For alternative accommodation arrangements, please contact the Barossa Wine and Tourism Association on 1300 852 982 or visit the website <https://www.barossa.com/visit/accommodation/>.

## Getting to the Novotel Barossa Valley Resort

The resort is located at 42 Pioneer Avenue, Rowland Flat, Barossa Valley. It is 85 kilometres (75-minute drive) from the Adelaide CBD and Adelaide Airport. The venue provides free on-site parking for guests. Car hire is readily available at Adelaide Airport and we encourage you to book when registering for this event.

## Endota Spa

Immerse yourself in down-to-earth pampering at the Novotel Barossa Valley Resort's own Endota Spa. Offering unparalleled relaxation, indulge in a range of spa experiences for your body, face, soul and mind, just a stone's throw away from your room. Bookings in advance on 08 8524 0071 or [barossavalley@endota.com.au](mailto:barossavalley@endota.com.au) are recommended to avoid disappointment.

## Golf at the Tanunda Pines Clubhouse

Golf at the Tanunda Pines Clubhouse is just a two-minute stroll from the resort. This world-class golf course is a stunning 18-hole, par-72 course with 100-year-old gum trees lining fairways that undulate across the hilltops of the Barossa Ranges and it just a two-minute stroll from the resort. It is available either pre, during or post-convention. Contact the club direct on 08 8563 1200 to make your individual or group booking, with golf clubs and motorised golf carts available for hire. Bookings in advance are recommended to avoid any disappointment.

## The Tasting Room

For those that are unable to go out and visit one of the 170 wineries in the Barossa, we will bring the Barossa to you! The Tasting Room offers complimentary wine tasting featuring a different winery every Thursday, Friday and Saturday. A wide range of wonderful Barossa products are also available for purchase at any time.



# Event information

## Welcome Reception | Wednesday, 5 August 2026

The Welcome Reception is included in the registration fee for delegates attending the full Convention. The Welcome Reception includes stand up dinner and drinks. Join us for an evening of networking and a showcase of Barossa's best food and wine.

## Convention Dinner | Thursday, 6 August 2026

As the sun sets over the Barossa, the stage is set for an evening of intrigue and sophistication. Join us for the Barossa Convention Dinner – Where agents, operatives, and sharp minds gather under one roof for a night of connection, conversation, and a touch of mystery.

We are back at Gomersal Winery for this year's Convention Dinner. Nestled in the heart of the iconic Barossa Valley, Gomersal Winery brings rustic, country elegance to life. Celebrate the achievements of members in the local Tax Community with an evening of fine-dining, networking and of course wine.

Dress to impress and make an entrance, with cocktail attire or spy-inspired ensembles encouraged – Think sleek suits, elegant evening wear, or a touch of covert sophistication. This unforgettable event is included in the registration fee for delegates attending the full convention.

## Continuing Professional Development (CPD)

Attendance at the Convention counts for 12 hours of CPD with The Tax Institute.

## The Tax Institute's Attendee Hub

This event will be accessible to all delegates via our dedicated Attendee Hub. Program information, materials (technical papers and presentations), survey forms and more will be available via The Tax Institute's virtual Attendee Hub. All delegates are encouraged to access the platform prior to the event. Technical papers and PowerPoint presentations will be available on the Attendee Hub to all participating delegates approximately five days before the event. Delegates will receive instructions on accessing the virtual Attendee Hub by email.

## Delegate List

A delegate list will be included on the Attendee Hub to assist with networking. Please indicate at the time of registration if you do not want your name to be included. Alternatively, you can edit your profile visibility settings in the Virtual Attendee Hub at any time during the event.

## Dress Code

Business or business casual attire is suitable for the duration of the Convention.

## Special Dietary and Accessibility Requirements

Please indicate any special dietary requirements at the time of registration. Please email us with any accessibility requirements at [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au).

## Cancellation Policy

The Tax Institute reserves the right to alter, amend or cancel all or any of the arrangements contained in the program. Should a face-to-face event be cancelled due to an event beyond The Tax Institute's reasonable control including 'an act of god', 'pandemic', 'health-related event' or 'government requirements', we will endeavour to transition to an online format to deliver the event. If there is a difference in price, a credit will be provided to delegates to be used at a future event.

It is a condition of acceptance of registration that an administration fee of 20% of the registration fee be charged for cancellation if you can no longer attend the event. Cancellations must be received in writing by The Tax Institute five working days prior to the event. No refund will be given for cancellations received within five working days of the event. A replacement may be nominated. If the replacement is not a member, the non-member registration fee will apply. CPD hours will be allocated to the designated attendee.

The Tax Institute cannot accept responsibility for delegates' late transport arrivals or non-arrivals due to delays.

## Privacy

We take your privacy seriously, and our policy can be viewed at: <https://www.taxinstitute.com.au/about-us/privacy-copyright-disclaimer>.

## Enquiries

For further information regarding this event, please contact the Events Team on 1300 829 338 or [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au).

For registration enquiries, please contact [customeradmin@taxinstitute.com.au](mailto:customeradmin@taxinstitute.com.au).

# Registration

## Registration inclusions

|                                                                                                        | Online access<br>to presentations<br>and technical<br>papers | Morning/<br>Afternoon Tea/<br>Lunches | Welcome<br>Reception and<br>Convention<br>Dinner* |
|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|---------------------------------------|---------------------------------------------------|
| <b>Full registration</b><br>This registration option entitles one delegate to attend the entire event. | ✓✓✓                                                          | ✓✓✓                                   | ✓✓✓                                               |

\*Additional tickets to the Networking function can be purchased on the registration form.

Full convention registration includes participation in the full technical program, electronic access to all available materials via the Barossa Convention Virtual Attendee Hub, attendance at the Wednesday Welcome Reception and Thursday Convention Dinner and all refreshments during convention hours. Registration fees do not include travel, accommodation, or hotel incidentals.

## Discounts

### Early bird registration

All registrations received and paid on or before Friday, 10 July 2026 will be entitled to an early bird discount.

### Group discounts

Purchase four full registrations (early bird or standard) and receive a fifth full registration for free. The free fifth registration must be of equal or of less value to the four paid registrations.

This offer cannot be redeemed in conjunction with any other promotional offer or code. All attendees must be from the same firm, and all registration forms must be submitted together. For further information please contact the national events team on 1300 829 338 or [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au).

### Confirmation of Registration

Please note you will receive two separate emails in the form of a tax invoice at the time of payment and a confirmation email at registration completion.

### Register now!

[Register online ▶](#)

[Register via form ▶](#)  
included in this brochure



A tax invoice and confirmation letter will be sent on receipt of your registration. Please photocopy for additional delegates and retain original copy for your records. All prices quoted are in Australian dollars and include GST where applicable. ABN 45 008 392 372.

## 1 Registration

Please see page 17 for registration inclusions.

### Full registration – 12 CPD hours

|                                                                              | Member                           | New member*                      | Non-member                       |
|------------------------------------------------------------------------------|----------------------------------|----------------------------------|----------------------------------|
| <b>Early bird registration</b><br>Register on or before Friday, 10 July 2026 | <input type="checkbox"/> \$1,795 | <input type="checkbox"/> \$2,215 | <input type="checkbox"/> \$2,095 |
| <b>Standard registration</b><br>Register after Friday, 10 July 2026          | <input type="checkbox"/> \$1,995 | <input type="checkbox"/> \$2,415 | <input type="checkbox"/> \$2,295 |

☐ I understand that the registration fees do not include printed materials. Access to materials will be electronic.

### Welcome Reception

The Welcome reception is INCLUDED in the registration fee for delegates attending the full Convention.

#### Wednesday, 5 August: Novotel Barossa Valley Resort

- ☐ Yes, I WILL be attending the Welcome Reception OR
- ☐ No, I WILL NOT be attending the Welcome Reception
- ☐ Yes, I require additional tickets for the Welcome Reception at \$80 per person

No.  x tickets at \$80 each: \$

Dietary requirements:

### Convention Dinner

The Convention Dinner is INCLUDED in the registration fee for delegates attending the full Convention.

#### Thursday, 6 August: Gomersal Winery

- ☐ Yes, I WILL be attending the Convention Dinner OR
- ☐ No, I WILL NOT be attending the Convention Dinner
- ☐ Yes, I require additional tickets for the Convention Dinner at \$200 per person

No.  x tickets at \$200 each: \$

Dietary requirements:

## 2 Delegate contact details

Member no.:

If your member details are up-to-date, you can skip this section.

Title: ☐ Mr ☐ Mrs ☐ Miss ☐ Ms Date of birth:

First name:

Last name:

Position:

Company:

Address:

Suburb:  State:  Postcode:

Telephone:  Mobile:

Email:

☐ Please tick this box if you do not wish your name to be included on the delegate list provided to all attendees for networking

### Become a member and save!

Not a member of The Tax Institute yet? Sign up for membership along with your event registration and:

- save over \$215 on Affiliate membership on the first 12 months
- access member-only prices to this and future events
- access all member-only technical resources.

Find out more about membership at  
[taxinstitute.com.au/membership](http://taxinstitute.com.au/membership)

I hereby apply for membership of The Tax Institute and declare that I am a person of good fame, integrity and character. I agree to be bound by the Constitution of The Tax Institute.

Signature:

Date of signature:

JOIN TODAY

### 3 Payment summary

|                                                           |    |                      |
|-----------------------------------------------------------|----|----------------------|
| Registration fees                                         | \$ | <input type="text"/> |
| Additional guest tickets – Welcome Reception (\$80 each)  | \$ | <input type="text"/> |
| Additional guest tickets – Convention Dinner (\$200 each) | \$ | <input type="text"/> |
| <b>Total payable</b>                                      | \$ | <input type="text"/> |

Please note: The Tax Institute cannot accept responsibility for delegates' late flight arrivals.  
Transfer costs are non-refundable and non-transferable.

### 4 Payment method

Please note: All registration payments must be made prior to the event, unless other arrangements have been made with The Tax Institute.

☐ **Cheque payable to The Tax Institute** (in Australian dollars)

☐ **Credit card**    Card type:    ☐ AMEX    ☐ Visa    ☐ Mastercard    ☐ Diners

Name on card:

Card no.:     Expiry date:

Cardholder's signature:

For our refund, cancellation and replacement policy, visit [taxinstitute.com.au/professional-development/event-policy](http://taxinstitute.com.au/professional-development/event-policy).

For event enquiries, please contact the National Events Team on 1300 829 338 or [nationalevents@taxinstitute.com.au](mailto:nationalevents@taxinstitute.com.au)

For registration enquiries, please contact [customeradmin@taxinstitute.com.au](mailto:customeradmin@taxinstitute.com.au)

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