Questioning of        
(represented by:       of      )

On application or general?

# Preliminary

* Water.
* Lunch time, how long we have until end (I leave before 5pm).
* Give client paper for notes to discuss at break.
* Set aside paper for our undertakings.
* Issues: risks, relocation

# Intro

* Can I get you to state your full name, please?
* Are you the NAME who has brought an application under Court of Queen’s Bench court file number      ?
* If I refer to the name “#CLIENT#”, will you understand that I’m referring to      , the Respondent to your Application?
* If I refer to the name “#CHILD#”, will you understand that I’m referring to your daughter      , born      ?
* Corporations
* Affidavits
  + Prior Affidavits
  + Are there any changes that you want to make to the evidence which you swore in your Affidavit? Everything is correct?
* Self-reps
  + Undertakings
    - Familiar with concept of undertakings?
    - Do you understand that an undertaking is a legal promise to provide documents?
    - Do you understand that if the document requested in an undertaking is in possession of a third party, you are required to request that the third party provide you with that document, and then forward it to my office?
    - I suggest writing down list of undertakings as it could be some time until you obtain a transcript, which must be paid for. I can provide you with paper and a pen upon request.
* Do you have a criminal record?
* Have you ever been arrested? Why?
* Have you ever been charged with committing any criminal, drug, or child welfare offences? Which offences? When?
* Have you been investigated or questioned by Alberta Child and Family Services, or any similar child protective agency? Describe? (**UNDERTAKE**)

Order: non-contentious, contentious but undisputable, confrontational

Ask their position

# Chronology of the relationship

* What day were you born?
* When did you and #CLIENT# start dating?
* When did you and #CLIENT# start living together?
* When did you and #CLIENT# cease living together?
* Other major events

# Relocation

* You presently reside in Edmonton, Alberta?
* New residence yet?
  + Will rent or own?
  + Submitted any applications?
  + Accepted?
  + Deposit paid?
* New employer yet?
  + Submitted any applications?
  + Any interviews?

# #Child#

* #CHILD# is now       old?
* How long has #CHILD# resided in #############?
* What is the current parenting time arrangement?
  + How long has that arrangement been in place? (Previously?)
* Do you use a car seat or booster seat?
  + Has it been inspected by the fire department? Inspected by any other agency?
* Residence
  + House, apartment, townhouse, other?
  + Owned or rented?
  + Backyard? Fenced?
  + How many bedrooms are in your residence?
  + Has the house been baby/child-proofed? Are there locks on chemical drawers?
* Child’s room
  + What furniture?
  + Toy box?
  + Dresser?
  + Crib?
  + Bed?
  + Any decorations on the wall? What?
  + What clothing do you have for #CHILD#?
* Schooling
  + Which system? Eg French immersion, catholic
* Healthcare
  + Has #CHILD# experienced any developmental issues? Taken to specialist?
  + Has #CHILD# experienced any significant health problems? As in more than a transitory sickness. Treated where?
  + Who is #CHILD#’s doctor? When did she first see that doctor? Approximately how many visits since? Who schedules appointments? Did you attend?
    - Have you included #CLIENT# in any visits to the doctor? When? Offered? Text or emails? (**UNDERTAKE**)
    - Has #CLIENT# requested to attend any doctor’s visits with you?
    - Have you asked #CLIENT# to attend any doctor’s visits with them?
  + Do you consult #CLIENT# in medical decisions related to #CHILD#? Text, email? (**UNDERTAKE** over last year)
  + Who is #CHILD#’s dentist? When did she first see that dentist? Approximately how many visits since? Who schedules appointments? Did you attend?
  + Do you consult #CLIENT# in dental decisions related to #CHILD#? Text, email? (**UNDERTAKE** over last year)
  + Does #CHILD# use any glasses, contacts, orthodontics, counselling, physio, speech therapy, or any other similar professional services? With which professional? When did she first begin attending? Did you attend?
    - Do you consult #CLIENT# in those decisions? Text, email? (**UNDERTAKE** over last year)
  + Who took #CHILD# for vaccinations? Who attended?
  + Who typically makes health decisions with respect to #CHILD#?
* School
  + #CHILD# is in grade ########? ###### Elementary?
  + Do their report cards indicate that they are performing well? How well? (If vague: **UNDERTAKE**)
  + Do they have any friends at school? Names? Those friends live in #########? Social?
* Daycare
  + Since entering Grade 1, has #CHILD# attended at a daycare or any other child care service?
    - Name?
    - Any record of attendance or log of hours used? (**UNDERTAKE**, OR to request and provide any records from the daycare which evidence the frequency of #CHILD#’s attendance)
    - (**UNDERTAKE** to provide all childcare receipts for #PERIOD#?)
* Religion
  + Does #CHILD# attend a church? Where? How regularly? How many years have they attended?
    - Have you ever attended with #CHILD#?
* Extra-curriculars
  + Is #CHILD# involved in any sports or other extra-curricular activities? Which? How many years have they participated?
    - How frequently do you attend these activities?
  + Any day camps or summer camps? What and where?
* Other location
  + Family
    - Do you agree that your mother, sister and brother reside in #LOCATION#?
    - Does #CHILD# have any family in #OTHERLOCATION#?
  + Has #CHILD# visited #OTHERLOCATION# before? How often?
    - What did you tell #CHILD# about #OTHERLOCATION#? That you’d be moving there?
  + Residence in #OTHERLOCATION#
    - Backyard fenced?
    - Has the house been child-proofed? Are there locks on chemical drawers? Type?
    - Does anyone else other than #PARTNER# presently reside at this house?
* Discussing parent
  + Do you discuss #CLIENT# with #CHILD#? What have you discussed? Incidents? Living arrangements?
  + Do you ever speak about #CLIENT# with your new partner, family, or friends while you’re inside of your house? Outside? While #CHILD# is in the house? While #CHILD# is in the same room? What is said?
  + Have you ever made any negative comments about #CLIENT# in front of #CHILD#? What?
  + Has your new partner, your parents, or your friends ever made any negative comments about #CLIENT# in front of #CHILD#? What? Did you take any steps from preventing this from reoccurring?
  + In the last year, have you made any positive comments about #CLIENT# in front of #CHILD#? What?
  + In the last year, have you encouraged #CHILD# to spend more time with #CLIENT#? When? Said what?
  + In the last year, have you encouraged #CHILD# to phone #CLIENT#? When? Said what?
  + In the last year, have you invited #CLIENT# to any of #CHILD#’s special events? Text or email? (**UNDERTAKE**)
  + In the last year, have you ever encouraged #CHILD# to share more information with #CLIENT#?
* New partners
  + Do you have a new partner? Name?
  + Did you and #CLIENT# ever discuss or reach an agreement as to when new partners would be introduced to #CHILD#?
  + When was #CHILD# introduced to your new partner?
  + When did you start dating your new partner?
  + When did your new partner first stay overnight at your residence? #CHILD# present?
  + Have you ever resided with your new partner? When?
  + Has your new partner ever resided with you for over a week at a time? Over a month?
  + To your knowledge, does your new parnter have a criminal record?
  + To your knowledge, has your new partner ever been arrested? Why?
  + To your knowledge, has your new partner ever been charged with committing any criminal, drug, or child welfare offences? Which offences? When?
  + To your knowledge, has your new partner been investigated or questioned by Alberta Child and Family Services, or any similar child protective agency? Describe? (**UNDERTAKE**)
  + To your knowledge, has your new partner ever consumed any non-prescription drugs? What drugs? When? Ever Sold? (even to a friend?)
* Alcohol
  + Do you consume alcohol?
  + Approximately how many beverages per week? Bottles or mixed drinks? (Measured?)
  + Do you ever consume alcohol while in the care of #CHILD#?
  + Have you ever been intoxicated while in the care of #CHILD#?
  + Have you ever been intoxicated in the presence of #CHILD#?
* Smoking
  + Do you smoke cigarettes?
  + Approximately how many cigarettes per day do you smoke?
  + Do you ever smoke inside of the same building as #CHILD#? Same room? Not even with the window open? Same vehicle? Not even with the window down?
* Drugs
  + Have you ever consumed any non-prescription drugs? (Which drugs? When did you last use each?)
  + Have you ever consumed or been under the influence of a non-prescription drug while in the presence of #CHILD#? In the care of #CHILD#?
* Have you ever consulted a counsellor, psychiatrist, psychologist, or therapist? Names? (**UNDERTAKE** to provide complete patient chart and notes of \_\_\_\_\_\_\_\_\_\_\_\_\_\_, we will pay any associated fee)
  + Was were these sessions in relation to?
  + Were you ever prescribed prescription medication as a result of these problems?
  + Have you ever been diagnosed with any mental illness? What? When?
  + Have you ever cancelled or failed to attend any sessions?
  + Have you ever refused or failed to implement the professional’s advice or recommendation?
* What pharmacy do you use? Ever used any other? (**UNDERTAKE** to provide prescription logs from pharmacy, we’ll pay any associated fee).
* Do you keep a journal?
  + Does it discuss #CLIENT#, #CHILD#, mental health, or drug use? (**UNDERTAKE**)

# Income

* Employer?
* Position?
* Salary or wage?
* Your income in       was      ?
* Since      , any material changes in your employer, employment position, rate of remuneration, benefits, hours worked?
* Do you have any businesses or hobbies for which you receive money?
* Do you receive any tips or commission?
* Do you receive any taxable benefits?
* Sources
  + Any income from RRSP or RESP since separation?
  + Any income from pension since separation?
  + Any income from term deposit since separation?
  + Any income from guaranteed investment certificate (GIC) since separation?
  + Any income from stocks or shares since separation?
  + Any income from any other investment since separation?
  + Any income from Employment Insurance (EI) since separation?
  + Any income from social assistance since separation?
  + Any income from worker’s compensation since separation?
  + Any income from any disability insurer or AISH since separation?
  + Any income from student finance since separation?
  + Any income from any business or hobby since separation?
  + Any income from partnership since separation?
  + Any income from corporation since separation?
  + Any income from trust since separation?

# Corporation

* Work for the corporation? How long? Previous employment?
* Structure
  + Any subsidiaries? Names? **UNDERTAKE** Financial Statements for 3 years (*CSG* s 21(1)(f)).
  + Parent corporation? Name?
  + Who are the shareholders?
    - What is their role within the corporation? What are their responsibilities? What services do they perform?
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they became shareholders of the corporation?
  + Who are the directors?
    - What is their role within the corporation? What are their responsibilities? What services do they perform?
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they became directors of the corporation?
  + Who are the officers? President? Secretary? Vice-president?
    - What is their role within the corporation? What are their responsibilities? What services do they perform?
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they became officers of the corporation?
  + Who is the corporation’s accountant?
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they became the corporation’s accountant?
  + Who is the corporation’s bookkeeper?
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they became the corporation’s bookkeeper?
  + To your knowledge, has the corporation ever been audited? When? Who audited? Ful or spot?
  + How many employees?
    - Names and positions
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they applied to work for the corporation?
  + Control
    - Role
      * What is your title in relation to the corporation?
      * Do you have any other business interests? Name and structure
        + No shares owned, unincorporated businesses, partnerships, sole proprietorships, or trusts?
      * Are you an officer or director of the corporation?
        + Are you an employee of the corporation?
      * What types of services do you perform for the corporation?
        + Communicate directly with clients?
    - Money/accounting handling
      * Have you ever dealt with the corporation’s accountant? Spoken? Met? Sent documents to the accountant?
        + Who signs the corporation’s tax returns?
        + UNDERTAKE to provide copies of all emails, faxes, and letters between you and accountant.
      * Have you ever dealt with the corporation’s bookkeeper? Spoken? Met? Sent documents to the bookkeeper?
        + UNDERTAKE to provide copies of all emails, faxes, and letters between you and bookkeeper.
      * Have you ever dealt with the corporation’s auditors? Spoken? Met? Sent documents to the auditors?
        + UNDERTAKE to provide copies of all emails, faxes, and letters between you and auditors.
      * Who pays the corporation’s bills and expenses?
      * Who receives revenues and funds on behalf of the corporation?
    - Other responsibilities
      * Who makes marketing decisions?
      * Employees
        + Who interviews potential new employees?
        + Who fires employees?
        + Who negotiates employee’s wages, salary, raises, and bonuses?
      * Who seeks out new clients? Who speaks to existing clients?
      * Lawyers
        + To your knowledge, which law firms has the corporation used?

Incorporated?

* + - * + Have you spoken to the corporation’s lawyers?
        + Have you ever provided instructions to the corporation’s lawyers?
      * Who speaks to the corporation’s lawyers?
    - Other controlling party
      * To your knowledge, have they ever spoken to the corporation’s accountants? About what? Were you present?
        + UNDERTAKE to provide copies of all emails, faxes, and letters between other party and accountant.
      * To your knowledge, have they ever spoken to the corporation’s bookkeepers? About what? Were you present?
        + UNDERTAKE to provide copies of all emails, faxes, and letters between other party and accountant.
      * To your knowledge, have they ever spoken to the corporation’s auditors? About what? Were you present?
        + UNDERTAKE to provide copies of all emails, faxes, and letters between other party and auditor.
      * Have they ever spoken to the corporation’s clients?
      * Have they ever spoken to any of the corporation’s lawyers? Provided instructions? Delegated decision-making authority to you or any other person?
      * In general, have they delegated any authority to you or any other person?
* Compensation
  + Pay
    - Received a salary or wage? Amount?
      * (Salary: so remuneration not based on hours worked?)
    - Paid for overtime? Rate?
    - Ever receive a bonus?
    - Ever receive management fees?
    - Ever receive a commission? Rate?
      * (So remuneration not based on hours worked?)
    - Compensation always like this? How before? When did the switch happen? Why?
    - Ever many any other cash withdrawals from the corporation?
  + Do you ever work on statutory holidays?
  + Receive any vacation time? Amount per year? Paid?
    - (How much vacation time did you take last year?)
  + About how many hours per week do you devote to the corporation?
  + Do you receive any employee benefits or other compensation?
* Hiding funds
  + Home
    - Home office?
    - Claim any portion of your home as a business expense in your personal taxes?
    - Does the corporation pay any of your home’s expenses or reimburse you for any of your home’s expenses?
    - Who pays your mortgage or rent?
      * Monthly cost? **UNDERTAKE** statement for last month.
      * Any reimbursement?
      * Payments automatic or manual?
      * Payments out which account?
      * Do you include any personal amount of mortgage or rent as a personal benefit in your tax return?
    - Who pays your power, electricity, water, and waste bills?
      * Monthly cost? **UNDERTAKE** statements for last month.
      * Any reimbursement?
      * Payments automatic or manual?
      * Payments out which account?
      * Do you include any personal amount of power, electricity, water or waste usage as a personal benefit in your tax return?
    - Who pays your internet?
      * Monthly cost? **UNDERTAKE** statement for last month.
      * Any reimbursement?
      * Payments automatic or manual?
      * Payments out which account?
      * Do you include any personal amount of internet expense as a personal benefit in your tax return?
    - Who pays your property taxes?
      * Yearly cost? On monthly instalment plan? **UNDERTAKE** last statement.
      * Any reimbursement?
      * Payments automatic or manual?
      * Payments out which account?
      * Do you include any personal amount of property taxes as a personal benefit in your tax return?
    - Who pays your home or renter’s insurance?
      * Monthly cost? **UNDERTAKE** statement for last month.
      * Any reimbursement?
      * Payments automatic or manual?
      * Payments out which account?
      * Do you include any personal amount of renter’s insurance usage as a personal benefit in your tax return?
    - Have cable TV?
      * Who pays your television bill?
      * Monthly cost? **UNDERTAKE** statement for last month.
      * Any reimbursement?
      * Payments automatic or manual?
      * Payments out which account?
      * Do you include any personal amount of cable TV usage as a personal benefit in your tax return?
  + Cell phone
    - Do you own a cell phone?
    - Same for work and personal?
    - Monthly cost? **UNDERTAKE** statement for last month.
    - Who pays for each?
    - Any reimbursement?
    - Payments automatic or manual?
    - Payments out which account?
    - Do you include any personal amount of cell phone usage as a personal benefit in your tax return?
    - Do friends or family members ever phone you on your work phone?
    - Take your personal cell phone to work? Always keep both on you? Now? Show me?
  + Landline
    - Do you have a landline phone at your residence?
    - Monthly cost? **UNDERTAKE** statement for last month.
    - Who pays for your landline?
    - Any reimbursement?
    - Payments automatic or manual?
    - Payments out which account?
    - Do you include any personal amount of your landline as a personal benefit in your tax return?
  + Life or disability insurance
    - Monthly cost? **UNDERTAKE** last statement.
    - Who pays for your life or disability insurance?
    - Any reimbursement?
    - Payments automatic or manual?
    - Payments out which account?
    - Do you include any personal amount of life or disability coverage as a personal benefit in your tax return?
  + Groceries & meals
    - Who pays for your groceries and meals?
    - Monthly cost? **UNDERTAKE** receipts for last month.
    - Any reimbursement?
    - Payments automatic or manual?
    - Payments out which account?
    - Do you include any personal amount of groceries as a personal benefit in your tax return?
  + Does your employer provide you with an expense account?
    - Any limits? What?
    - Any records of expenses submitted? **UNDERTAKE** to provide details of submissions during #PERIOD#.
* Imputing
  + Receipt of cash
    - Cash received?
    - By who?
    - Receipting process when cash received?
  + Medical reasons
    - Are you experiencing any significant health problems?
      * What?
      * Seeking treatment?
      * With which medical professional? **UNDERTAKE** to provide complete patient chart and notes of \_\_\_\_\_\_\_\_\_\_\_\_\_\_, we will pay any associated fee.
  + Approximately how many hours per week do you work?
    - For only the corporation, or for any other business?
    - Hours tracked? **UNDERTAKE**
  + Resumes/applications
    - Within the last year, have you sent your resume to any potential employers, or applied for any new positions? To whom? (Mail, email, fax?) (UNDERTAKE to provide resume)
  + Historical spending patterns of the corporation
    - Have you ever earned greater compensation from the corporation? Which years?
* Transfers
  + Have you ever transferred or sold any business interests to any other person?
    - What kind of business?
    - Reason for transfer?
    - To whom?
    - When?
    - For how much?
      * Valuation method?
      * Business appraisal obtained first? **UNDERTAKE**
      * Paid how? To which account? When? **UNDERTAKE**
    - Written agreement? **UNDERTAKE**

# Disclosure - Corporate

* **UNDERTAKE** General ledger last year and this year
* **UNDERTAKE** Financial Statements last three years including all **schedules**
  + **UNDERTAKE** to provide amortization schedule setting out original cost and current amount of depreciation for all vehicles, computer equipment, other equipment, and all other depreciable property?
  + (If provided: includes all Schedules?)
* **UNDERTAKE** bank account statements last year and this year.
* Disclosure
  + Corp financial statements for last three years
  + **UNDERTAKE** to provide a statement showing a breakdown of all salaries, wages, management fees, or other payments or benefits paid to, or on behalf of, persons or corporations with whom the corporation, and every related corporation, does not deal at arm’s length?
    - **UNDERTAKE** to have accountant and bookkeeper sign the statement?

# Income/Expenses - Corporate

* Depreciation/amortization (amount in FS)
  + Calculated by accountant?
  + Plans to replace equipment? How soon?
  + Purpose of asset? Affects business how?
  + Any money being set aside to acquire new assets? How much? Which account? (**UNDERTAKE** provide account number)
  + **UNDERTAKE** to provide breakdown of depreciation expense for expenses incurred throughout #PERIOD#., including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Automotive (amount in FS)
  + What kinds of automotive expenses are claimed in the corporation’s taxes?
    - Loan, insurance, gas, registration, repairs, maintenance, oil changes?
  + How is the automotive expense calculated?
  + Did the automotive expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + For which vehicles?
    - All registered in corporation’s name?
    - Used for what purposes?
  + **UNDERTAKE** to provide receipts claimed in #PERIOD#.
  + Record of travel of mileage kept? **UNDERTAKE**
  + **UNDERTAKE** to provide breakdown of automotive expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Repairs and maintenance (amount in FS)
  + Types of repairs and maintenance claimed?
  + How is the repair/maintenance expense calculated?
  + Did the repair/maintenance expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + For which vehicles?
    - All registered in corporation’s name?
    - Used for what purposes?
    - **UNDERTAKE** to provide mechanic and shop invoices claimed in #PERIOD#.
  + **UNDERTAKE** to provide breakdown of repairs and maintenance expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Travel & field expenses (amount in FS)
  + What types of travel and field expenses are claimed?
  + How is the field/travel expense calculated?
  + Did the field/travel expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Which employees are travelling or in the field?
  + Travel to what types of destinations?
  + Records of travel or mileage kept? **UNDERTAKE**
  + **UNDERTAKE** to provide breakdown of travel & field expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Advertisement/Entertainment/Meals/Promotions (amount in FS)
  + What types of entertainment and promotion expenses are claimed?
  + How is the advertisement/entertainment/meals/promotions expense calculated?
  + Did the advertisement/entertainment/meals/promotions expense personally benefit yourself, your new partner, your parents, or your children?
    - How was the portion of the personal expense calculated?
  + Meals? Whose? Discussed what? Including the portion of your meal? New partner’s? Parent’s? Siblings? Children’s? Records or notes of meetings kept? **UNDERTAKE**
  + Gifts? What? To whom? You? New partner? Parents? Siblings? Children?
  + Does the corporation ever purchase alcohol? Consumed by who? You? New Partner? Parents? Siblings?
  + **UNDERTAKE** to provide breakdown of entertainment/promotions expense for expenses incurred throughout #PERIOD#, including type of expense, separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Land rent (amount in FS)
  + Paid for what land?
  + How is the land rent expense calculated?
  + Did the land rent expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Registered owner of land?
    - What is their relationship to you outside of the corporation? Family relation? Friend? Known before the corporation began renting the land?
  + Address? **UNDERTAKE** legal land description (property taxes)
  + Have you ever lived on this land? Presently?
  + Farm
    - House on land?
      * Who lives there?
      * Acres taken up by residence?
  + Home office
    - One room? How many bedrooms in residence? Total rooms including bathrooms and kitchen?
    - What do you do in your office?
      * (Computer located in any other room in the house?)
    - Square footage of residence? Including basement?
    - Square footage of office space?
  + **UNDERTAKE** to provide breakdown of land rent expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Shop and equipment rent
  + What shop?
    - Located where? Address? **UNDERTAKE** legal land description (property tax)
    - On land registered in whose name?
      * What is their relationship to you outside of the corporation? Family relation? Friend? Known before the corporation began renting this shop?
    - Square footage in relation to parcel?
  + What equipment?
    - Owned by who? **UNDERTAKE** registration if applicable
      * What is their relationship to you outside of the corporation? Family relation? Friend? Known before the corporation began renting this equipment?
    - Used only by the corporation?
  + How is the shop/equipment rent expense calculated?
  + Did the shop/equipment rent expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + **UNDERTAKE** to provide breakdown of shop & equipment rent expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Supplies and small tools (amount in FS)
  + What types of supplies and small tools are claimed by the corporation as expenses?
  + How is the supplies & small tools expense calculated?
  + Did the supplies & small tools expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Have you used any of the supplies or tools on your own residence? On your vehicle?
  + **UNDERTAKE** to provide breakdown of supplies & small tools expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Banking fees/interest (amount in FS)
  + How is the banking fees/interest expense calculated?
  + Did the banking fees/interest expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Separate corporate and personal accounts?
  + Ever deposit the corporation’s funds into your personal banking account, your new partner, your parents, your siblings’s, or your children’s?
  + Ever use your personal credit card for the corporation’s expenses?
  + **UNDERTAKE** to provide breakdown of banking fees/interest expense for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Freight and postage (amount in FS)
  + What types of items did you pay shipping for?
  + How is the freight/postage expense calculated?
  + Did the freight/postage expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Purchases and outgoing mail?
  + Purchases from what sources?
  + Ever combine orders so that your personal purchases are shipped at the same time as the corporation’s?
    - Or your new partner’s purchases? Parent’s? Sibling’s?
  + **UNDERTAKE** to provide receipts for all shipping costs paid to ship purchases over #PERIOD#.
* Insurance (amount in FS)
  + Types of insurance? Vehicle, house, life, health, medical, dental, disability?
  + How is the insurance expense calculated?
  + Did the insurance expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Does any of the insurance insure any vehicle used by you for personal purposes?
  + Does any of the insurance insure any building or premises you reside in?
  + Does any of the insurance insure your life, health, or against disability?
  + Does any of the insurance reimburse you for medical or dental expenses?
  + Insurance providers? **UNDERTAKE** to provide most recent statement of each insurance policy.
  + **UNDERTAKE** to provide breakdown of insurance expenses for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Office expenses (amount in FS)
  + Types of office expenses claimed?
  + How is the office expense calculated?
  + Did the office expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Kept separate from home office supplies?
    - Separate printer? Separate paper?
  + **UNDERTAKE** to provide breakdown of office expenses for expenses incurred throughout #PERIOD#, including separating any portion which benefitted yourself or any other person in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Professional fees
  + All to accountant or bookkeeper?
  + Legal services paid for during #PERIOD#? In relation to what?
  + How is the professional fees expense calculated?
  + Did the professional fees expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
* Utilities and telephone
  + Which utilities? Power? Heating? Internet? Cell phones? Land lines? Cable TV?
  + How is the utilities/telephone expense calculated?
  + Did the utilities/telephone expense personally benefit yourself, your new partner, your parents, your siblings, or your children?
    - How was the portion of the personal expense calculated?
  + Which buildings/land?
  + Paid for any building in which any person sleeps overnight? Who?
    - (What is their relationship to you outside of the corporation? Family relation? Friend? Known before they began residing here?)
  + **UNDERTAKE** to provide breakdown of utility and telephone expenses for expenses incurred throughout #PERIOD#, including separating any portion which benefitted your residence or any other person’s residence in any way, the name of the person who benefitted if not you, and the method you used to calculate that personal benefit component?
* Wages & benefits (amount in FS)
  + Any amounts paid to your new partner, your parents, your siblings or to your children?
  + Any amounts paid to any other of your family or relatives?
  + Paid to who?
    - What is their relationship to your outside of the corporation? Family relation? Friend? Known before they became an employee of the corporation?
    - Salary, hourly wage, commission, bonuses?
    - Hours tracked? How? Submitted how often? **UNDERTAKE**
    - **UNDERTAKE** to provide breakdown of employee names, positions, salary, wages, commissions, bonuses, and benefits paid to each.
* Increasing cash or retained earnings (amount in FS)
  + Foresee any upcoming expenses over $10,000?
  + Any expenses over $10,000 incurred since last Financial Statement prepared?
* Rate of return on land/investments/cash (amount in FS)
* Dividends (amount in FS)
  + Paid to who?
* Shareholder loans (amount in FS)
  + To your knowledge, has any shareholder ever loaned money or assets to the corporation? Who? When? Reason? Original amount? Amount outstanding? When will it be repaid? Interest rate? Written loan agreement? **UNDERTAKE** statement and proof of any repayment
  + To your knowledge, has the corporation ever loaned any money or assets to a shareholder? Who? When? Reason? Original amount? Amount outstanding? When will it be repaid? Interest rate? Written loan agreement? **UNDERTAKE** statement and proof of any repayment
  + To your knowledge, has the corporation ever loaned any money or assets to any other person? Who? When? Reason? Original amount? Amount outstanding? When will it be repaid? Interest rate? Written loan agreement? **UNDERTAKE** statement and proof of any repayment
    - What is their relationship to you outside of the corporation? Family relation? Friend? Known before they received a loan?
  + To your knowledge, has the corporation ever received a loan or credit from anyone other than a certified financial institution? Who? When? Reason? Original amount? Amount outstanding? When will it be repaid? Interest rate? Written loan agreement? **UNDERTAKE** statement and proof of any repayment
* Inventory adjustments (amount in FS)
  + Reason?
  + Inventory disposed of how?
* Losses on investments (amount in FS)
  + Type of investment?
  + Investment into what?
  + Any relationship to any shareholder, director, or officer of the company invested into prior to the investment being made?
  + Expected profit?
  + Original amount? Present amount outstanding?
    - (Repaid when?)
* Capital gains/losses (amount in FS)
  + Sold to who?
    - What is their relationship to you outside of the corporation? Family relation? Friend? Known before they purchased this property?
  + Bill of sale or other sale or transfer agreement? **UNDERTAKE**
  + To your knowledge, has the corporation sold this type of asset in the past? How often?
  + Was the asset earning income? Investment? Land? (**UNDERTAKE** statement or receipts)
  + What happened to the sale proceeds? (which account?) **UNDERTAKE** bank statements

# Disclosure - Personal

* Provide
  + ITR
    - Year \_\_\_\_ completed?
      * If not: **UNDERTAKE** to provide T4s, T4As, other tax slips, and written Statement disclosing all sources of income?
    - Required: Copy of every ITR for three most recent taxation years?
      * (Difficulty: request from accountant or submit Access to Information Request to the CRA).
    - Provided complete ITR, including all schedules, T4s, T4A, and other tax slips?
  + NOA
    - Year \_\_\_\_\_\_ received?
      * If not: **UNDERTAKE** to provide once received.
    - Required: Copy of every NOA and NOR for three most recent taxation years?
      * (Difficulty: can create an account at <http://www.cra-arc.gc.ca/myaccount/> for recent years. Can submit Access to Information Request to the CRA.)
      * Ever reassessed? When? Why?
  + Pay stubs
    - Required: Three most recent pay stubs, including YTD amount.
      * OR a letter from employer indicating salary or hourly rage.
      * (Difficulty: request in writing from employer)
    - **UNDERTAKE** each pay stub for last year and current year.
    - Any other employers last year or this year? (Same)
  + Own or have an interest in any unincorporated businesses?
    - Required: last 6 weeks of cancelled cheques.
      * (Difficulty: request from bank)
    - Required: three most recent years of Financial Statements.
      * (Complete with schedules)
    - **UNDERTAKE** to provide a statement showing a breakdown of all salaries, wages, management fees, or other payments or benefits paid to, or on behalf of, persons or corporations with whom the business, and every related business, does not deal at arm’s length?
      * **UNDERTAKE** to have accountant and bookkeeper sign the statement?
    - **UNDERTAKE** last year and this year’s bank account statements.
  + Own at least 1% of a corporation?
    - Required: three most recent years of Financial Statements.
      * (Complete with schedules)
    - **UNDERTAKE** to provide a statement showing a breakdown of all salaries, wages, management fees, or other payments or benefits paid to, or on behalf of, persons or corporations with whom the corporation, and every related corporation, does not deal at arm’s length?
  + Bank
    - Required: 6 months of bank account statements and **cancelled cheques**
    - Understand cancelled cheques?
      * (When you write a cheque to any other person, and they cash it, the bank then scans a copy of that cheque, sends it to yours, and then your bank can produce a copy of those cancelled or cashed cheques.)
      * (Missing any?)
    - Any bank accounts held jointly with another person?
    - Do you have a access or possess a debit card for an account held by any other person, business, or persons?
    - **UNDERTAKE** bank account statements and cancelled cheques for accounts in your name or held jointly with any other person for last year and this year.
  + Credit cards
    - Required: 6 months of credit card statements
    - Any credit cards held jointly with another person?
    - Do you have a access or possess a credit card for an account held by any other person, business, or persons?
    - **UNDERTAKE** monthly credit card statements for credit cards in your name or held jointly with any other person for last year and this year.
    - Have or have access to a line-of-credit?
      * (In your name? Jointly? Have the card?)
      * **UNDERTAKE** monthly statements for lines of credit in your name or held jointly with any other person for last year and this year.
  + Monthly budget
    - Monthly budget
    - Any income estimated? Which?
    - Any expenses estimated? Which? (Not even groceries?)
      * (Estimate calculated how? Experience? Receipts? Bank statements?)
    - Expenses include any portions that have been paid by any other person over the last year?
      * (Rent or groceries don’t include contributions from new partner or roommates?)
    - Any changes in income or expenses since drafted?
    - Any income or expenses change based on the season? Eg summer or winter.
  + Sworn itemized list of income, assets and liabilities
    - Method of calculating expected income for current year?
    - (Acquired before, during, or after relationship?)
    - (Any valuations?)
    - (Legal land descriptions)
  + Exemptions
    - (If not: **UNDERTAKE** to provide list of exemptions)
  + Section 7s
    - Required: **List** and **receipts** for all claimed.
    - (Don’t pay for any section 7 expenses?)
  + Partnership
    - Required: confirmation of income, draws from, and capital in the partnership, for three most recent tax years.
  + Other income
    - Any income from employment insurance, social assistance, pension, RRSP, term deposits, GICs, any other investment, WCB, disability payments, share or dividend, trust income, student funding (including loans, grants, bursaries, scholarships, living allowance).
      * (if so: Statements for all of last year and this year)
  + Are you a beneficiary under any trust?
    - Required: Settlement Agreement and three most recent Financial Staetments.
    - Who is the trustee?
    - Who are the other beneficiaries?
  + Related
    - Any related businesses? Subsidiaries? Parent companies?
    - Companies that have business relationships or partnerships with the company?
    - Companies owned or controlled by your new partner, siblings, or parents?

# Income - Personal

* Undocumented expenses (not in bank account statements)
* Employee benefits
  + Any separate work accommodation? Paid by who? Amount of time used per month?
  + Receive a living allowance? How much?
  + Use a vehicle for work?
    - Owned by who?
    - Separate personal vehicle?
    - Make, year, model?
    - Expenses paid by who? Which expenses? Reimbursed?
    - Does the corporation pay any of the vehicle loan, gas, insurance, or vehicle registration in relation to any vehicle?
    - Permitted to drive it to and from home?
      * (Or does it stay at the worksite?)
      * Any deduction for travel to and from job sites?
      * Ever shop for yourself while you’re using the company vehicle?
  + Has the corporation ever paid for any flights, train, or busses in which you were the passenger? To where? When? How much? Any documentation? UNDERTAKE
  + Has the corporation ever paid any parking expenses for a vehicle which you were in control of? When? How much? Any documentation? UNDERTAKE
    - While parked, did you perform any personal shopping, or visit friends or family members?
  + Has the corporation ever paid any lodging or accommodations for you? How much? When? Any documentation? UNDERTAKE
  + Has the corporation ever paid for any sports or gym memberships which you used? When? How much? Any documentation? UNDERTAKE
  + Any stock options provided by employer? Terms? Written agreement? **UNDERTAKE**
  + Receive any gifts or awards from employer? What? When?
  + Any professional membership fees paid by employer? How much? When? Any documentation? UNDERTAKE
  + Has the corporation ever paid part of all of the cost of a health plan, medical, dental, disability, sickness, or accident insurance which you have used? Which provider or insurance company? Any documentation? UNDERTAKE
    - To your knowledge, are there any insurance plans under which you, your new partner, your parents, your siblings, or your children are the beneficiary? Which insurance company? Any documentation? UNDERTAKE
  + Has the corporation ever made any pension contributions on your behalf? How much? When? Any documentation? UNDERTAKE
  + Has the corporation ever reimbursed you for any moving expenses, sale of a home, or relocation costs? How much? When? Any documentation? UNDERTAKE
  + Has the corporation
  + Do you receive any employee discounts on any of the corporation’s products or services? How much? When? Any documentation? UNDERTAKE
  + Has the corporation ever paid for part or all of any meal which you ate or provided you with a meal allowance? How much? When? Any documentation? UNDERTAKE
  + Has the corporation ever paid for any uniforms or special clothing for you? What? How much? When? Any documentation? UNDERTAKE
* Large expenses/lifestyle

# Child support

* Current monthly amount?
* When did that amount start being paid?
* Any arrears?
* Split of extraordinary expenses?
* Any arrears of extraordinary expenses?

# Spousal Support

* Current monthly amount?
* When did that amount start being paid?
* Any arrears?
* Is #CLIENT# paying any bills or expenses in relation to your residence or any of the property in your possession, such as a vehicle?
* Budget
  + Have there been any new expenses?
  + Are any of these items no longer an expense?
  + Go through budget
* Will you undertake to provide a copy of your employee file through      ? (**UNDERTAKE**)

# Property Division

* Assets
  + Do you own or rent your residence?
  + Do you own any land in Alberta?
  + Do you own any land outside of Alberta?
  + Do you own a pension?
  + Do you own any RRSPs?
  + Do you own any Locked-in Retirement Accounts or LIRAs?
  + Do you own any term deposits?
  + Do you own any Guaranteed Investment Certificates or GICs?
  + Do you own any insurance policies? Do any of them carry a refundable balance?
  + Do you own any other investments?
  + Do you own a chequing account? Bank? Balance?
    - Joint or separate?
    - Who decided on expenditures?
    - Who kept a budget?
  + Do you own a savings account? Bank? Balance?
  + Do you own any physical cash? Amount? Location?
  + Do you own a safety deposit box? Location? Contents?
  + Do you own any vehicles? Make, model, year of each
  + Do you own any motorcycles, quads, recreational vehicles, campers, trailers?
  + Have you completed your       taxes? Owed a refund? How much?
  + Are you a shareholder, director, or officer of any corporation or cooperative?
  + Are you a partner in a partnership?
  + Are you a beneficiary of any trust?
  + Are you holding or in possession of any assets on behalf of any other person?
  + Go through MPS
    - Can ask where each item is
  + Debt as of which date? Monthly payment? Acquired when? Value on marriage? Maximum limit?
* Have you acquired any new assets since executing your Sworn Statement of Income, Assets, and Liabilities on      ?
* Have you disposed of any assets since executing your Sworn Statement of Income, Assets, and Liabilities on      ?
* Bank accounts and credit cards
  + Does anyone else have any access to account/card?
  + Will you undertake to provide all account statements since the separation that we don’t already have? (**UNDERTAKE**)
* Business
  + Undertake to provide company credit card statements since      ?
* Was there a document or anything signed? (**UNDERTAKE**)

Exhibit example

* (**HANDOUT** – text messages) At line ###, ####### says “############”, then at line ### you state “################”, and after ###### asks if ############, at line ### you state “################”.
  + That correspondence was on ###########, the day after ##########?
  + At any time after that text message did you and ######### agree to ############## different?
  + Do you agree that you later unilaterally chose a different ############### for ############, without informing #########?
  + (**MARK AS EXHIBIT**)
* Do you agree that you prevented ######### from seeing ############ until the day after ############’s birth?
* Birthday
  + Do you agree that ########## asked for time with ########## away from your parents on ###########?
    - Did you make any effort to arrange for ####### to see ########### away from your parents on #########?
  + ########## denies that he was actually invited to #############, do you have any text messages, emails, or other evidence to support your claim that you did invite him? (**UNDERTAKE**)
  + Did you send ############# any pictures of ################? When?
* **[BREAK TO TALK TO CLIENT TO SEE IF THERE ARE ANY OTHER QUESTIONS.]**
* "I will conclude my questioning at this time, subject to the responses to undertakings and any of the documents that I requested you produce, and any positions that you tell me that you object to for which we so decide to bring a court application to compel same. Thank you for coming today.
* **[REDIRECT/RE-EXAMINATION OF MY CLIENT]**