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Featured Articles and Seminars

Article: An “Inchoate” Theory Cannot Save a Tax Not Charged: A Reply to the Rejoinder
Canadian Tax Journal, vol. 60, no. 1
2012

Presentation: Structuring the Sale of a Family Business
Tax-Effective Succession Planning for the Owner-Manager, Federated Press, Toronto
Feb 21-22 2012

Presentation: A Fresh Look at the Attribution Rules
2011 Annual National Tax Conference, Canadian Tax Foundation, Montreal
November 27-29 2011

Chapter: Tax Treaty Interpretation: What is the Relevant of Later OECD Commentaries: A Canadian Perspective
Derecho Fiscal Internacional: Temas Selectos, ITAM, 2011

Article: Canadian Tax Law Developments
The Euromoney Corporate Tax Handbook 2012

Article: Toronto-Dominion Wins Case, Gets Loss
Tax Notes International
Aug 15 2011

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Article: Has Parliament Failed to Charge the "Tax on SIFT Partnerships"?

Canadian Tax Journal, vol. 59, no. 1

Feb 1 2011

Article: Foreign Investment Entities: Unresolved Issues

CCH Canadian Limited

Apr 1 2010

Article: Purposive Interpretation

Canadian Tax Highlights

Aug 1 2009

Article: Some Thoughts on the Use of Later OECD Commentaries After Prévost Car

Tax Notes International

May 1 2009

Article: Prévost Car Inc. (FCA): Holdco Confirmed as Beneficial Owner of Dividends

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