

TABLE OF CONTENTS

<i>Acknowledgements</i>	ix
<i>Preface</i>	xi
<i>About the Authors</i>	xv
PART 1 – KEY POINTS	
Chapter 1 – Fundamental Objectives and Principles	1/1
<i>by Jean-Pierre Vidal</i>	
Chapter 2 – Overview of the BEPS Project	2/1
<i>by Jean-Pierre Vidal, Angelo Nikolakakis, and Marwah Rizqy</i>	
Chapter 3 – Two-pillar Reform: Reallocation of Taxing Rights and Global Minimum Tax ..	3/1
<i>by Lyne Latulippe and Gabriella Sobodker</i>	
Chapter 4 – History of Tax Treaties	4/1
<i>by Marwah Rizqy</i>	
Chapter 5 – Status and Structure of Tax Treaties	5/1
<i>by Allison Christians and Nicolas Benoît-Guay</i>	
Chapter 6 – Tax Law Interpretation	6/1
<i>by Chantal Jacquier, Jean-Pierre Vidal and Allison Christians</i>	
Chapter 7 – Interpretation of Canadian Tax Treaties	7/1
<i>by Chantal Jacquier, Jean-Pierre Vidal and Allison Christians</i>	

	Case Study	7/47
	by <i>Raphaël Clément</i>	
Chapter 8 – Residence in Canada		8/1
	by <i>Annick Provencher, Jean-Pierre Vidal,</i> <i>Marie-Pierre Allard and Chantal Bélanger</i>	
	Case Studies and Recommended Solutions	8/47
	by <i>Cindy Harvey</i>	
Chapter 9 – Permanent Establishment in Canada		9/1
	by <i>Annick Provencher</i>	
	Case Studies and Recommended Solutions	9/53
	by <i>Cindy Harvey</i>	
PART 2 – CANADIAN-SOURCE INCOME		
Chapter 10 – Part I Tax for a Non-Resident of Canada		10/1
	by <i>Delphine Latulippe and Jean-Pierre Vidal</i>	
Chapter 11 – Part XIII and Part XIV Tax		11/1
	by <i>Jayme Yeung and Raphaël Clément</i>	
	Case Studies and Recommended Solutions . . .	11/43
	by <i>Cindy Harvey</i>	
Chapter 12 – Part XIII Anti-Avoidance Rules: Sections 212.1 and 212.3 of the ITA.		12/1
	by <i>Mathieu Gendron and Camille Rivard</i>	
Chapter 13 – Cross-Border Financing		13/1
	by <i>Jayme Yeung and Raphaël Clément</i>	
	Case Studies and Recommended Solutions. . .	13/53
	by <i>Sara-Michelle Marcotte-Génier</i>	
Chapter 14 – Cash Pooling Arrangements		14/1
	by <i>Julie Michaud, Sébastien Rheault</i> and <i>Jing Yu Wang</i>	

PART 3 – FOREIGN-SOURCE INCOME

Chapter 15 – Taxation of Foreign-Source Income	15/1
<i>by Judith Charbonneau Kaplan</i>	
Case Studies and Recommended Solutions . . .	15/31
<i>by Cindy Harvey</i>	
Chapter 16 – Foreign Affiliates I:	
Foreign Accrual Property Income	16/1
<i>by Jean-Pierre Vidal</i>	
Case Studies and Recommended Solutions . . .	16/85
<i>by Cindy Harvey</i>	
Chapter 17 – Foreign Affiliates II:	
Dividend to Shareholders.	17/1
<i>by Jean-Pierre Vidal</i>	
Case Studies and Recommended Solutions . . .	17/99
<i>by Cindy Harvey</i>	
Chapter 18 – Foreign Affiliates III:	
Income Recharacterization	18/1
<i>by Jean-Pierre Vidal</i>	
Case Studies and Recommended Solutions . . .	18/41
<i>by Cindy Harvey</i>	
Chapter 19 – Foreign Affiliates IV: Financing	19/1
<i>by Angelo Nikolakakis</i>	
Case Studies and Recommended Solutions . . .	19/39
<i>by Cindy Harvey</i>	
Chapter 20 – Foreign Affiliates V: Anti-Avoidance	
Rules	20/1
<i>by Jean-Pierre Vidal and Marie Blanchard</i>	
Chapter 21 – Taxation of an Offshore Investment	
Fund Property (Section 94.1).	21/1
<i>by Mathieu Gendron and Camille Rivard</i>	

PART 4 – TRANSFER PRICING

- Chapter 22 – Transfer Pricing I: OECD Guidelines 22/1**
by Jean-Pierre Vidal
- Case Studies and Recommended Solutions. **22/79**
by Jean-Pierre Vidal
- Chapter 23 – Transfer Pricing II: Canadian Rules 23/1**
by Jean-Pierre Vidal
- Case Studies and Recommended Solutions. **23/73**
by Jean-Pierre Vidal
- Chapter 24 – Transfer Pricing III: Intangibles, Services, Cost Contribution Arrangements 24/1**
by Jean-Pierre Vidal
- Chapter 25 – Transfer Pricing IV: U.S. Regulations 25/1**
by Candace M. Marriott
- Case Studies and Recommended Solutions. **25/53**
by Candace M. Marriott

PART 5 – SPECIAL TOPICS

- Chapter 26 – Taxation of Non-Resident Trusts 26/1**
by Nadia Rusak and Jonathan Charron
- Case Studies and Recommended Solutions. **26/57**
by Nadia Rusak and Jonathan Charron
- Chapter 27 – Expatriates 27/1**
by Sophie Casgrain
- Case Studies and Recommended Solutions. **27/43**
by Cindy Harvey
- Chapter 28 – Multilateral Instrument (Action 15). 28/1**
by Marwah Rizqy

Chapter 29 – e-Commerce	29/1
by <i>Marwah Rizqy</i>	
Case Studies and Recommended Solutions. . .	29/59
by <i>Marwah Rizqy</i>	
Chapter 30 – Tax Treatment of Foreign Exchange Gains and Losses	30/1
by <i>Laura Gheorghiu</i> and <i>Malya Amghar</i>	
Chapter 31 – Collection of Foreign Tax Debts	31/1
by <i>Vincent Langlois</i> and <i>Vincent Dionne</i>	
PART 6 – U.S. TAXATION	
Chapter 32 – Introduction to U.S. Taxation	32/1
by <i>Marwah Rizqy</i>	
Chapter 33 – Estate Planning in a Canada–U.S. Context	33/1
by <i>Marwah Rizqy</i>	
Case Studies and Recommended Solutions. . .	33/21
by <i>Marwah Rizqy</i>	
Conclusion	CON/1
by <i>Jean-Pierre Vidal</i>	
Bibliography	BIB/1
Table of Legislation	LEG/1
Table of Cases	CAS/1
Index	IND/1
Table of Contents of the French Book	TCF/1