WeirFoulds

Tax

Our lawyers advise on all areas of federal and provincial taxation. We have extensive experience advising Canadian and international clients on mergers and acquisitions, reorganizations, business and investment structuring, financings, securities offerings, executive compensation and other employment tax issues, individual and estate tax planning, and a broad range of corporate tax matters.

WeirFoulds also represents clients at every stage of the tax dispute resolution process, from audits through to administrative appeals and at every level of court. Confident in our ability to produce results, we regularly offer clients contingency or success fee billing alternatives if they wish to shift some of the risk to us.

Our tax lawyers are frequently called upon to present on tax topics at conferences and other venues and are published regularly in preeminent tax journals.

Lawyers and professionals in this area



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Areas of Expertise

- Business taxation
- Charities and not-for-profit taxation
- Commodity taxation (GST/HST)
- Employment tax issues
- Estate planning
- International (inbound and outbound) tax planning
- Mergers and acquisitions
- Partnership taxation
- · Personal taxation
- Reorganizations and restructurings
- Structuring and advising on securities offerings
- Tax compliance advisory services
- Tax litigation & dispute resolution
- Transfer pricing

Representative Experience

Tax Dispute Resolution

- Make voluntary disclosures to head-off disputes and protect against penalties and prosecution
- Seek rectification or other remedies to avoid or assist with tax disputes
- Help clients manage tax audits and respond to auditors
- Represent clients with administrative appeals and at every level of court

Business Taxation

- Work seamlessly as part of a multidisciplinary team to advise on the taxation aspects of business acquisitions, divestitures, reorganizations and restructurings
- Provide advice on a broad range of taxation matters of importance to Canadian and foreign business entities, including mining and resource taxation, and tax aspects of financings, structured investment products and employment compensation

Cross-Border Taxation

- Advise on investments, and expansion of businesses, into and out of Canada, including with respect to transfer pricing and withholding tax obligations
- Advise on cross-border debt and equity offerings
- · Advise on tax aspects of the cross-border movement of employees and the immigration and emigration of individuals

Owner Manager Taxation and Estate Planning

- Advise on and assist with implementing estate freezes
- Advise on capital gains exemption planning
- Advise on succession planning
- Advise on and assist with implementing post-mortem tax plans

Sales and Commodity Taxation

• Advise on customs duties, harmonized sales tax (HST), goods and services tax (GST), federal excise tax and duties, provincial land transfer taxes, and other provincial taxes, such as mining taxes

Charities, NPOs and tax-exempt organizations

- Assist charities in becoming and staying registered
- Assist organizations achieving and maintaining not-for-profit or tax-exempt status

WeirFoulds

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