

THOMSON REUTERS

Taxation of Corporate Reorganizations

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Note: The date in brackets (04/2019) in the top left and right corners of each page indicates the release date (month/year), not the release number. For the remainder of 2019, the release date will continue to follow the same format.

The following are highlights of the first release for 2019.

VOLUME 2

CAPITAL TRANSACTIONS

Specific topics discussed include: consequences of section 51; non-arm's length sale of shares (section 84.1); exchange of shares by a shareholder in the course of reorganization of capital (section 86); foreign spin-offs (section 86.1); and non-arm's length sale of shares by non-residents (section 212.1).

In *Pomerleau c. La Reine*, further commentary has been added regarding Justice Favreau's decision being upheld by the Federal Court of Appeal. Updated commentary has been added regarding *1245989 Alberta Ltd. v. R.*; *Perry Wild v. R.*, as the decision was reversed by the Federal Court of Appeal.