



# Tax Disputes & Resolution Centre on Taxnet Pro™

The intelligence, technology and human expertise  
you need to find trusted answers.



the answer company  
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# All the information and answers you need in one place for clarity and efficiency

Imagine finding a clear path through the tax disputes process – every twist and turn and decision point. The Tax Disputes & Resolution Centre has been created in collaboration with tax dispute thought leaders to provide all the relevant guidance and materials you need to efficiently identify the issues in your tax dispute and mitigate risk for your client.

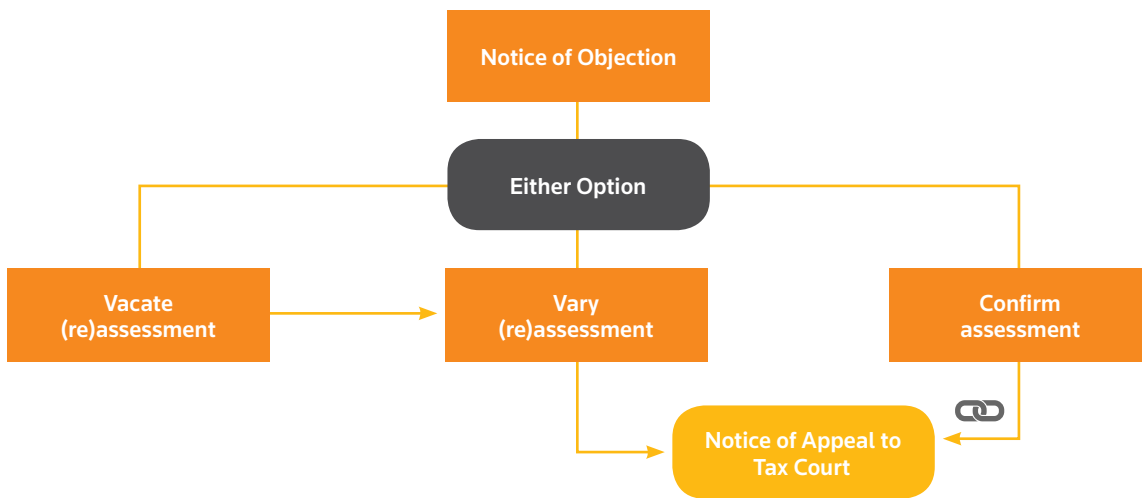
## Tax Disputes & Resolution Centre:

- Tracks cases before the courts so you don't have to
- Guides you on potential courses of action with tips and strategies from leading tax minds
- Equips you to practise defensive tax reporting by keeping you current on the issues

The screenshot shows the Taxnet Pro interface for the Tax Disputes & Resolution Centre. The top navigation bar includes 'All Content', 'Tax Disputes & Resolution Centre', 'Tax Foresight', 'History', 'Folders', 'Options', 'Help', 'Français', 'Logout', 'Feedback', and 'Client File: NONE'. A search bar is present with the text 'Search Tax Disputes & Resolution Centre' and a 'Search' button. Below the navigation bar are tabs for 'HOME', 'SEARCH', 'TABLE OF CONTENTS', 'NEWS', 'CENTRES', and 'EXPERTS'. The main content area is titled 'Tax Disputes & Resolution Centre' and features a 'Highlights' section with a featured article: 'Solicitor-Client Privilege and the Québec Court of Appeal (Blakes)'. Below this is a 'Navigate & Search' section with links to 'Legislation, Commentary & Government Documents', 'Practical Insights', 'Manuals & Reports', 'Articles', 'Frequently Disputed Topics', and a list of provinces. A 'Spotlight on Ed Kroft' section includes a photo of Ed Kroft and a biographical text. Callout boxes highlight: 'Search tax disputes and resolution documents exclusively' (pointing to the search bar), 'Frequently updated Highlights keep you informed of the latest news in the area of tax disputes' (pointing to the Highlights section), 'Quick links take you to frequently used legislation' (pointing to the Navigate & Search section), 'Find all related Practical Insights, commentary, legislation, and government documents organized by topical area' (pointing to the left sidebar), and 'Learn more about and connect with authors' (pointing to the Spotlight on Ed Kroft section).

# The right tools to help you obtain the best outcome quickly and cost effectively

Checklists, decision trees, and flow charts help you see at a glance all the aspects that you need to consider at various stages of dispute resolution to avoid costly tax mistakes.



## Related Objection Documents

- Practical Insights [🔗](#)
- Checklist [🔗](#)

## Notice of Objection Forms

- Form E413 (Excise Tax Act) [🔗](#)
- Form E414 (Purchaser) [🔗](#)
- Form E676 (Air Travellers Security Charge Act) [🔗](#)
- Form GST159 (GST/HST) [🔗](#)
- Form E680 (Excise Act, 2001) [🔗](#)
- Form ON100 (Ontario Corporations Tax Act) [🔗](#)

Notice of Objections Flow Chart with Links out to Applicable Forms

## Know who is working on what and stay alert to defensible positions

Topics, law firms, and tax experts are tracked so that you don't have to spend valuable time each week monitoring the field.

- **Cases of Note** are notable cases, which have been flagged by tax experts as changing or reaffirming the tax landscape. These cases impact decisions through the TCC, FC or SCC are classified by topic allowing you to drill down your search quicker and easier.
- **Case Tracker** provides you with a list of cases past, present, and future from the Tax Court of Canada. You have the option of creating a download to further allow for sorting and filtering, providing you with the specific cases relevant to your research. You may filter by industry, topic, hearing date, counsel and much more. Additionally, the report links out to the appropriate TCC case.
- Cases under Appeal – A listing of past cases under appeal.

Three **dedicated newsletters** written by various leading tax experts, which are topical in nature and include legislative and case law updates, providing a broader picture with various points of view:

- Blakes on Canadian Tax Controversy & Tax Litigation
- The Common Reporting Standard in Canada
- The Tax Advocate

# 300

Number of hours per year that lawyers are spending to manually search and track tax dispute cases\*

\*Source: Thomson Reuters Canada survey

## Exclusive Practical Insights from leading tax litigators

Tap into a comprehensive understanding of the subtleties of tax procedures and the tax dispute resolution process with our exclusive Practical Insights – subject-specific commentaries written and updated by leading tax practitioners.

Practical Insights on Tax Disputes & Resolution Centre are arranged consistently across each topical area and provide:

- **Comprehensive commentary** on topics such as Books & Records, GAAR, Assessments, Tax Shelters, Directors' Liability, Tax Information Exchange, Voluntary Disclosure among many others
- In-depth **practical analysis and guidance** including the Canada Tax Service by McCarthy Tétrault, current newsletters written by a variety of practitioners, Cases of Note, Charts, Checklists, and numerous articles
- All Taxnet Pro case law, CRA Manuals, CRA Views and several other government docs and legislation
- **Extensive legislative, administrative and case law references** with hyperlinks provided throughout, along with fillable forms



**Practical Insights are available in the following topics:**

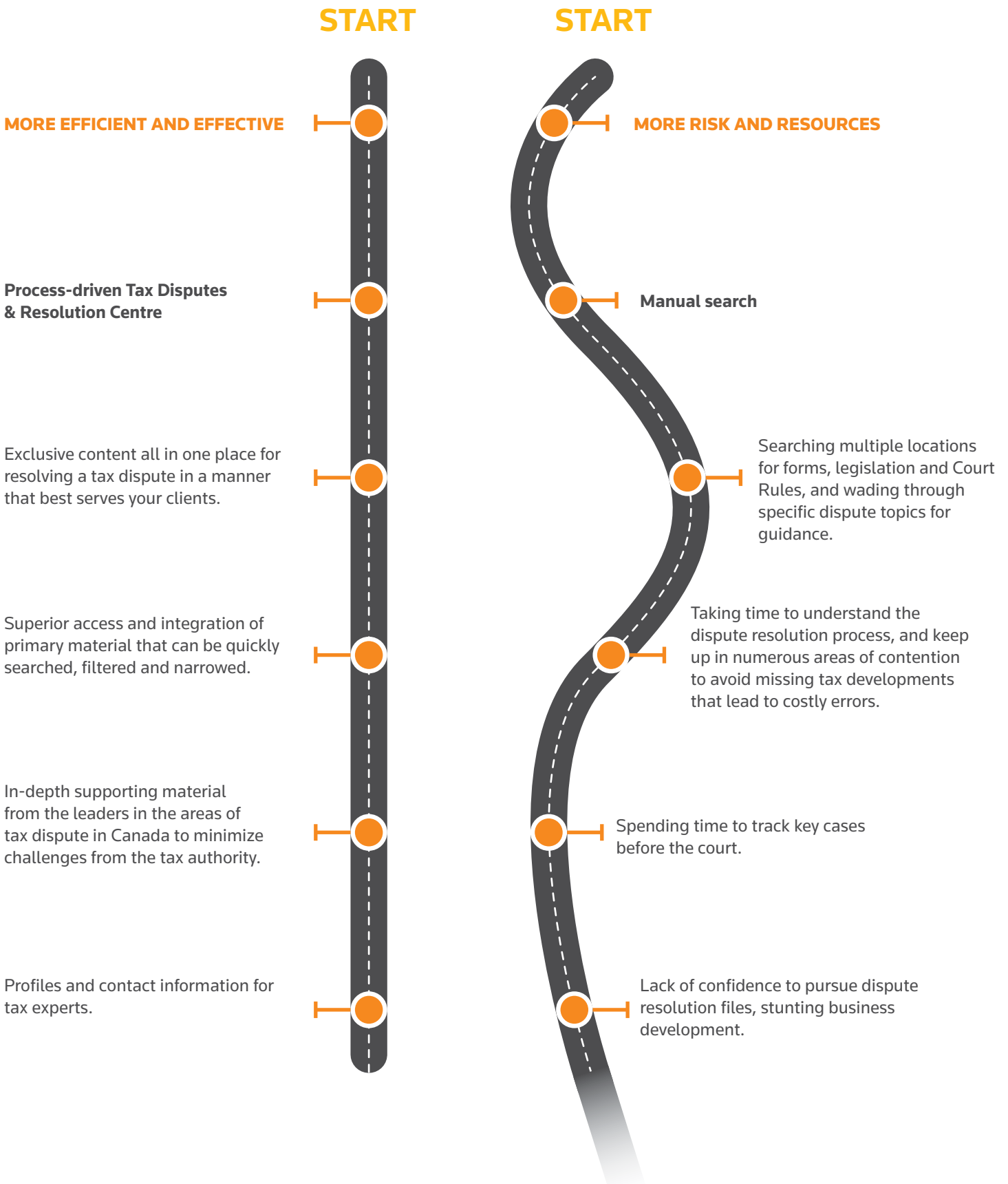
- 100 Tips for SMEs: How to Avoid Costly Mistakes When Dealing with the CBSA – *Cyndee Todgham Cherniak*
- Judicial Review – *Peter Aprile and Yoni Moussadji*
- Advising Canadians before the IRS – *Max Reed*
- Audits – *Carmina Chan*
- Books and Records – *Ryan Keey*
- Confidentiality & Privacy – *George Alatopulos*
- Criminal Tax – *David Chodikoff*
- Differentiating the Jurisdiction Between the Federal Court and the Tax Court – *David Piccolo*
- Director's Personal Liability (frequently litigated topics) – *Karen Stilwell*
- Drafting Pleadings – *Carmina Chan*
- Employee or Independent Contractor / Personal Services Businesses (frequently litigated topics) – *Karen Stilwell*
- Evidence – *Robert McMechan, Dean Blachford, and Samuel Singer*
- General – Anti-avoidance Rule (GAAR) – *Vern Krishna*
- GST Disputes and Litigation Issues – *Étienne Gadbois*
- Informal Procedure – *Carmina Chan*
- Legal Privilege – *Vern Krishna*
- Objections – *Kay Leung, Rob Martini and Christine Ashton*
- Resolving Tax Disputes Prior to Going to Court – *Peter Aprile*
- Search & Seizure – *David Chodikoff*
- Settlement Strategies in Tax Disputes – *Peter Aprile*
- Tax Court Appeals – *Brandon Siegal*
- Tax Information Exchange Agreements – *David Kerzner*
- Tax Evasion – *David Chodikoff*
- Taxpayer Rights – *Vern Krishna*
- Transfer Pricing – *David Chodikoff*
- Trust Residency and Other Audit Issues – *Gwen Benjamin and Jag Gandhi*
- Voluntary Disclosure – *Ryan Rabinovitch*
- And many more

**75,970**

**Number of income and commodity tax disputes filed in 2014-2015\***

\*Source: Canada Revenue Agency Annual Report to Parliament 2014-2015

# Navigate a safer path toward resolving tax disputes



Visit [www.gettaxnetpro.com/tax-disputes-resolution-centre](http://www.gettaxnetpro.com/tax-disputes-resolution-centre) to learn more or to request a free demo.

## Advantage Over Other Research Services

	Taxnet Pro	Other Services	
Comprehensive Tax Content	<b>Three comprehensive tax libraries</b>	Federal Income Tax, GST, and Provincial Tax – include all primary legislation, government documents, case law, and unsurpassed commentary.	No other service matches the extensiveness of commentary and level of integration.
	<b>More in-depth Commentary</b>	Taxnet Pro commentary contains more author and expert contributions from numerous sources including McCarthy Tétrault and other leading authors covering a wide variety of tax topics.	No other service offers the depth and breadth of commentary as Taxnet Pro.
	<b>Specialty Destinations</b>	Taxnet Pro has a greater capability of meeting the Tax Professionals' specific research needs. 7 powerful resources Corporate Tax Centre, Tax & Estate Planning Centre, Federated Press Centre, Tax Disputes & Resolution Centre, Customs & Excise Centre, Reference Centre, and APFF Centre are specialty areas within Taxnet Pro that provide you with the information and solutions you need to make informed business decisions.	Not available on other services.
Ease of Use	<b>Visual Indicators</b>	Visual indicators help you keep track of work you have already done.	No other service has anything comparable to Taxnet Pro's visual indicators.
	<b>Search</b>	The Quick Search box at the top of every page allows you to choose how you want to search. You can search widely with a general search or conduct a very specific search using the Query Builder and selecting a content type.	This flexibility is not matched on other services.
Canada's Most Advanced Tax Search Engine	<b>Sort and Filter Results</b>	Lets you search broadly across all content and then sort by content type such as cases, statutes, and more. You can also narrow your list results by any applicable field.	No other service has this level of filtering capability.
	<b>Query Builder</b>	The Query Builder allows you to create complex queries quickly and easily. It is available throughout the site and when used will build the Boolean terms and connectors query for you.	No other service offers this unique functionality to help you simplify your search process.
	<b>Search Templates</b>	The search templates on Taxnet Pro provide a layer of granularity which allows you to focus in on just the documents you are interested in.	No other service facilitates your search through the use of search templates.
	<b>Table of Contents</b>	Table of Contents allows you to navigate through all of the content on Taxnet Pro. This is one of the more popular methods of searching as it allows you to see exactly where your hits occur. Navigation is made easy with the ability to limit your view to just those documents which contain hits.	Although other services have a Table of Contents, they only show you what is within your subscription. With Taxnet Pro, be confident that you're never missing a key document.
Finding Tools	<b>Cross References</b>	Not only does Taxnet Pro have the most cross references, with over six million, it is also the most easiest to use. With the ability to narrow your cross-references, search within them and preview any cross-reference document, we have created an efficient way to ensure yourself that no documents have been missed.	The document integration with other services is lacking in comparison and functionally resulting in the opportunity for missed documents.
Analyze and Organize More Efficiently	<b>Project Folders</b>	Allows you to drag-and-drop key documents and save copy with reference snippets into folders organized by issue, client, or topic, which puts all vital information in one place for quicker access later. With Taxnet Pro, you can also create nested folders for better organization of your research.	No other service compares to the integrated foldering capabilities available on Taxnet Pro.
	<b>Copy with Reference</b>	You can copy and paste text into your work product with all available references.	No other service offers this.

## Tax doesn't stand still. Neither does Taxnet Pro™

Tax professionals rely on Taxnet Pro every day to understand complex information, make informed decisions and use knowledge more efficiently. Taxnet Pro delivers an unsurpassed selection of outstanding industry specific news, analysis and commentary to keep you current with important developments in the industry, and legislative changes that can impact your clients. You'll have confidence knowing you're drawing from the most accurate and reliable authority.

On Taxnet Pro, you're never more than a few clicks away from the high quality content that gives you confidence your research is complete.

### Specialty Solutions

Our practice-specific products have been developed specifically to match how research is done in each practice area.

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Corporate Tax Centre

Customs & Excise Centre

Federated Press Centre

Tax & Estate Planning Centre

Tax Disputes & Resolution Centre

OECD Collection

Reference Centre

Compliance Guides

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