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One - 10In cases of  
dual residency, the  
Canada/U.S. tax treaty  
has tie breaker rules.  
Under these

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rules residence would be determined by applying criteria in the following order:!

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One - 8 Case 4 The  
Case 4 solution would  
be calculated as  
follows: Income Under

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ITA 3(a): Interest  
Income \$ 6,250 Net  
Business Income  
43,962 \$50,212  
Income Under ITA 3(b):  
Taxable Capital Gains  
[(1/2)(\$12,376)] \$  
6,188 Allowable Capital  
Losses [(1/2)(\$23,874)]  
( 11,937) Nil Balance  
From ITA 3(a) And ...

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found in Chapter 1 of  
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(M) 5-5 (M) Subject

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CHAPTER 3  
HOMEWORK  
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Three - 1 Cheeco  
Marques As the bonus is not paid within 3 years of the end of the year in which the services were rendered, this is a salary deferral arrangement. The company will deduct the bonus in the taxation year ending November 30, 2017.

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includes the Income Tax Act, Income Tax Folios, and other official materials). The Income Tax Act is referenced in the text where appropriate for further independent study.

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Byr Note To Instructor  
If you are assigning  
this problem, note that  
only the first two  
answers can be found  
in Chapter 1 of the  
text. The  
circumstances under  
which a general  
provision of the Income  
Tax Act can be

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overridden ...

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