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Conclusion. Section 85 Tax Rollovers represent nexus between law and accounting. As such, it is common for lawyers and accountants to work together to help achieve both efficiencies and desirable results for clients. The content of this article is intended to provide a general guide to the subject matter.

Section 85: Rollover And Income Tax Planning - Tax - Canada

Canadian taxation of U.S. sourced income. Canadian Controlled Private Corporations are taxable on their worldwide income, which would include U.S. sourced income. To avoid duplicate taxation, Federal and State taxes paid to the U.S. can be used as a foreign tax credit to reduce taxes owed in Canada.

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