



Representative Legal Matters

Jacques Bernier

- Counsel to the Canadian Bar Association in its intervention in the IGGillis Holdings Inc. v. Minister of National Revenue matter before the Federal Court of Appeal.
- Lead counsel to Front Street Management Inc. in its successful transfer pricing and FAPI appeal in the Tax Court of Canada.
- Represented a multinational pharmaceutical company in the successful resolution of its appeal with CRA - Appeals (HQ) from substantial transfer pricing adjustments.
- Counsel to Metropolitan Life Insurance Company in its successful judicial review litigation involving a Part XIII refund.
- Lead counsel to Rigel Financial Holdings Inc. in its FAPI and GAAR appeal before the Tax Court of Canada.
- Lead counsel for Canada Safeway Limited in its successful tax appeals, which involved Alberta and Ontario General Anti-Avoidance Rules.
- Represented several large multinational companies in the cancellation of proposed transfer pricing penalties before the Transfer Pricing Review Committee.
- Represented a multinational company in the successful resolution of its administrative appeal with CRA - Appeals (HQ) involving the debt forgiveness rules.
- Lead counsel for Home Depot of Canada Inc. in its successful GST appeal before the Tax Court of Canada.
- Lead counsel for Research In Motion Limited in its litigation and resolution of SR&ED claims concerning stock options benefits and related fairness application.
- Lead counsel for SmithKline Beecham Animal Health Inc. in its litigation in the Tax Court of Canada and Federal Court of Appeal and related settlement regarding transfer pricing adjustment.
- Lead counsel for Canadian Imperial Bank of Commerce, Amex Canada Inc., Bank of Montreal, Banque Laurentienne, Banque Nationale du Canada, Canada Trust Company, Canadian Tire Financial Services Ltd., Hudson's Bay Company, and the Toronto-Dominion Bank with respect to their GST appeals relating to the interpretation of "financial service" under subsection 123(1) of the Excise Tax Act.