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<sup>1</sup> #[2020-0847181C6](#).

<sup>2</sup> *Income Tax Act*, (R.S.C., 1985, c. 1 (5th Supp.) as amended) (the Act). Unless otherwise stated, all statutory references in this article are to the Act.

<sup>3</sup> #[2012-0449801C6](#).

<sup>4</sup> *Ibid.*

<sup>5</sup> *Supra* note 1.

<sup>6</sup> #[2020-0837611C6](#).

<sup>7</sup> #[2020-0839951C6](#).

<sup>8</sup> [2020-0839921C6](#).

<sup>9</sup> See Kevin Wark, “[Tax Planning Arrangements Involving Insurance Products – Part 2](#)” *Insurance Planning Vol. XXV No.3* and “[The CRA Responds – 2020 CALU Roundtable](#)” *Insurance Planning Vol. XXV No. 4*.



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