

1979

Taxation of Transnational Operations: Recent Developments and Current Issues in Canada and the United States: Introductory Remark

Robert Woolham

Karen N. Moore

Follow this and additional works at: <http://scholarlycommons.law.case.edu/cuslj>



Part of the [Transnational Law Commons](#)

Recommended Citation

Robert Woolham and Karen N. Moore, *Taxation of Transnational Operations: Recent Developments and Current Issues in Canada and the United States: Introductory Remark*, 2 Can.-U.S. L.J. 116 (1979)

Available at: <http://scholarlycommons.law.case.edu/cuslj/vol2/iss/16>

This Speech is brought to you for free and open access by the Student Journals at Case Western Reserve University School of Law Scholarly Commons. It has been accepted for inclusion in Canada-United States Law Journal by an authorized administrator of Case Western Reserve University School of Law Scholarly Commons.

Taxation of Transnational Operations: Recent Developments and Current Issues in Canada and the United States

Introductory Remarks

Robert Woolham

I AM THE CANADIAN Consul in Cleveland, and I have been given the privilege and opportunity of welcoming participants to the first Canada-United States Law Institute Conference on taxation. Today's Conference involves developments and current issues of taxation in Canada and the United States. As you know, this event has been sponsored jointly with the Greater Cleveland International Lawyers Group and from our own perspective, of course, we are happy to see this kind of development come from something that has been developing over a number of months—years now—through the efforts of several people, including a person I see a great deal of and that's Sidney Picker. I always find it unnerving that every time Canadians come to Cleveland we are inevitably greeted with some snow which also happens to be the case today. I can assure you the weather in Canada does not have snow all the time. You will find out that in some of the recent changes in our tax laws there are benefits for vacationers from this country who might go to Canada. I can't think of a more fitting place to hold this discussion on taxation than in Cleveland. As you probably know, Cleveland is about the ninth ranking consumer market in the United States. It is about the sixth ranking industrial market, and I believe it ranks third or fourth in terms of corporate headquarters. I know by my own count that there are over 330 subsidiaries in Canada of companies that are located in the territory covered by our Consulate here. In any event, it is my pleasure to welcome you. I hope that you will find the activities and the discussions of interest and use, and I hope it represents in the long-run not only a better understanding and not simply work for the legal profession, but some real progress towards those things which we can share and develop in common.

And without further ado, I would like to turn the Conference over to the Chairman of the first session of the program, Professor Karen N. Moore, of the Case Western Reserve University School of Law.

Karen N. Moore

I AM VERY PLEASED to be able to introduce the first panel this morning. This panel will be focusing on a review of the Canadian and American tax systems and their impact on transnational business operations. First, we will be hearing from Mr. Peter Cumyn, a partner in the Montreal law firm of Stikeman, Elliott, Tamaki, Mercier & Robb. Mr. Cumyn is also the President

of the Canadian Chapter of the International Fiscal Association and, in addition, is a member of Revenue Canada's Taxation Advisory Committee. As such, Mr. Cumyn will address the topic of Canadian taxation and its impact on transnational business operations. Speaking from an American perspective will be Mr. Robert Bergquist, a partner in the law firm of Shearman & Sterling in New York City.* We will begin with Mr. Cumyn's remarks.

* Mr. Bergquist's remarks at the Conference were unable to be reprinted due to technical difficulties.