

Solution to AP 1-7

Case A

Residency terminates at the latest of:

- the date the individual leaves Canada;
- the date the individual's family leaves Canada; and
- the date that individual establishes residency elsewhere.

As Gary's family did not leave Canada until June 30, 2021, Gary would be considered a Canadian resident until that date. Provided he has no intention of returning to Canada, he would be a Canadian resident for the period January 1, 2021, through June 30, 2021. He would be subject to Part I tax on his worldwide income during this period. He would not be subject to Part I tax on his rental income subject to that date.

Note to Instructors As will be discussed in Chapter 20, the tax on the rental income would not be subject to Part I tax. It would be Part XIII tax.

Case B

As noted in S5-F1-C1, "Determining an Individual's Residence Status", commuting from the U.S. for employment purposes does not make an individual a deemed resident under the sojourner rules. Therefore, Sarah would not be considered a Canadian resident for income tax purposes.

Sarah would be subject to Canadian tax on her 2021 Canadian employment income. She would not be subject to Canadian tax on her U.S. savings account interest.

Case C

Byron's cruise would be considered a temporary absence from Canada. Given the facts, it appears his intent is not to permanently sever residential ties with Canada. This position is evidenced by the fact his cruise is for a limited time and he will not be establishing residency in another country.

Byron's departure does not appear to be a true departure in that he has only taken a leave of absence from his job. In addition, he has retained some residential ties.

Given these facts, Byron will remain a Canadian resident during his cruise and would be subject to Canadian tax on his worldwide income during all of 2021.

Case D

As she is exempt from taxation in Germany because she is the spouse of a deemed Canadian resident, Hilda would be a deemed resident of Canada for income tax purposes during 2021 [(ITA 250(1)(g)].

Hilda would be subject to Canadian tax on her worldwide income during 2021.

Case E

Because she has an employment contract that requires her to return to Canada in 2024, Jessica will be viewed as having retained Canadian residence status. Although she has severed her ties with Canada, the requirement to return would show that she does not intend to permanently leave Canada.

Jessica will be subject to Canadian tax on her worldwide income during 2021.

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Thomas Edward DeZern



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