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#### Explanation of Footnotes

Footnotes throughout the book cite the authorities for the conclusions given and unless otherwise indicated refer to the following:

- Sec. Indicates a section of the Income Tax Act, R.S.C. 1985 (5th Supp.) c. 1, as amended.
- ITAR Indicates a section of the Income Tax Application Rules, 1971.
- Reg. Indicates a section of the Income Tax Regulations.
- Interp. Refers to an Interpretation Bulletin issued by the Canada Revenue Agency. The full text of each Interpretation Bulletin is reproduced in the Wolters Kluwer CANADIAN TAX REPORTER.
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- CCH This reference is to fuller coverage of the subject in the Wolters Kluwer CANADIAN TAX REPORTER. The numbers following such references are to paragraphs of the Reporter.
- DTC This reference is to the Wolters Kluwer DOMINION TAX CASES where the cases cited are reported in full text.

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## Table of Contents

	Paragraph
Foreword .....	100
Tax Charts	
Tax Calendar .....	250
Indexed Personal Income Tax Parameters for 2013 and 2014 .....	300
Non-Refundable Personal Tax Credits — 2014 .....	400
2014 Combined Marginal Tax Rates .....	410
Top Marginal Rates — A 17-Year History/Deferred Income Plan Contribution Limits — 2009–2015 .....	415
Personal Income Tax Rate Components — 2014 .....	425
Federal and Provincial Income Taxes Payable by Individuals at Various Levels of Taxable Income — 2014 .....	430
Federal Corporate Tax Rates — 2008–2014 .....	460
Corporate Income Tax Rates by Province — 2014 .....	465
Canadian-Controlled Private Corporation (CCPC) Income Tax Rates .....	470
Prescribed Interest Rates .....	475
Automobile Rates and Limits .....	477
Foreign Exchange Rates .....	480
Capital Tax Rates and Exemptions for 2014 .....	485
Payroll Tax Rates for 2014 .....	490
Provincial Health Insurance Premiums .....	495
Rates of Withholding Tax under Income Tax Agreements Signed by Canada .....	520
Chapter I Introduction to Income Taxation in Canada .....	700
II Taxation of Individuals .....	2000
III Income from Business or Property .....	3000
IV Capital Cost Allowance .....	4000
V Capital Gains and Losses .....	5000
VI Corporations and Their Shareholders .....	6000
VII Partnerships and Trusts .....	7000
VIII Tax Rates, Averaging, and Credits .....	8000
IX Special Cases .....	9000
X Deferred and Special Income Arrangements .....	10,000
XI Tax Exemptions .....	11,000
XII Returns, Assessments, Payments, and Appeals .....	12,000
XIII Special Transactions Taxes .....	13,000
XIV Non-Residents, International Income, and Tax Agreements .....	14,000
XV Administration, Enforcement, and Interpretation .....	15,000
XVI Sales Taxes .....	16,080
XVII Tax Planning .....	17,010
Topical Index .....	18,000