



## Cédric Primeau

Associate

### Office

Montréal

### Tel

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### Expertise

Tax

### Bar Admissions

Québec, 2024

Ontario, 2022

## Cédric's experience as a judicial clerk informs his practice in tax law.

Cédric has assisted clients on various aspects of their domestic tax disputes with both provincial and federal tax authorities. He has represented clients before various levels of court, including the Tax Court of Canada, the Court of Québec and the Québec Court of Appeal.

Before joining Davies, Cédric was a judicial law clerk at the Tax Court of Canada. He previously worked at one of the largest professional services firms in the world within their mining group.

### REPRESENTATIVE WORK

#### Private Equity Firm

Representing a private equity group before the Tax Court of Canada in connection with a dispute involving foreign exchange forward contracts in what is commonly referred to as "straddle" trading undertaken by a substantial number of taxpayers.

### INSIGHTS

Federal Court of Appeal Confirms CRA Can Collect Arrears Interest Despite Absence of a Tax Debt  
Dec. 04, 2024

Association de planification fiscale et financière, Colloque sur la fiscalité de l'immobilier 2024, "Jurisprudence récente et interprétations techniques – Domaine immobilier"; Montréal, QC  
Sept. 19, 2024

Trop vite pour les fiducies simples  
July 01, 2024

Supreme Court of Canada Reprimands Québec Court of Appeal's Use of "Secret Trial"  
June 11, 2024

### EDUCATION

University of Ottawa, Faculty of Law, J.D., LL.L, 2021

University of Ottawa, Faculty of Engineering, B.A.Sc, 2018

### PROFESSIONAL AFFILIATIONS

Association de planification fiscale et financière  
Canadian Tax Foundation