

RADU-MIHAIL ANGHEL



Categories: People, Lawyers

Dr. Radu-Mihail Anghel is the senior Economist in our Transfer Pricing Practice. Radu holds a PhD in economics and stands as one of Canada's leading transfer pricing practitioners.

Dr. Anghel served as a senior economist with the Canada Revenue Agency's International Tax Division for over ten years. Radu has great familiarity with the CRA's transfer pricing policies and procedures and, more fundamentally, with the CRA's perspectives on contentious transfer pricing issues. Radu has been involved in all stages of a CRA transfer pricing file, including risk assessment, audit design, functional analysis interviews, industry and transfer pricing analysis, audit defense, negotiations with foreign tax administrations (MAP and APA), and appeals.

Radu played a central role in developing many of the CRA's current approaches to assessing the arm's length pricing of sales, service and licensing arrangements in the pharmaceutical industry. Radu also made significant



contributions to the Canadian Government's submissions as part of the OECD's BEPS project.

Radu has regularly taught transfer pricing courses to international tax auditors and transfer pricing economists at the CRA, as well as to tax administration officials in several developing countries.

Email: radu-mihail.anghel@mcmillan.ca

Expertise: Tax

Language Spoken: English, French

Location: Ottawa **Phone:** 613.691.6110

Position/Title: Senior Economist, Transfer pricing

Education & Admissions:

Degree: Ph.D., Economics**Teaching Engagements:**

• Radu teaches economics at McGill University, the University of Ottawa, and Carleton University in both English and French.

Practices: Tax