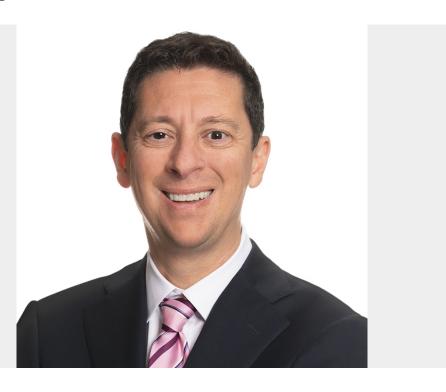
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STEVEN SITCOFF*



Categories: People, Lawyers

Steven Sitcoff is a highly experienced lawyer with a practice primarily focused on providing domestic and international corporations with proactive and practical tax planning solutions to assist them to further their business objectives. He has significant experience working with private and public companies from various sectors including consumer products, retail, real estate, financial services, and entertainment.

Steven provides comprehensive legal and tax advice to Canadian companies with national and cross-border activities as well as to companies from abroad expanding into Canada.

Steven is repeatedly called upon for his unique combined expertise in taxation and private aviation matters. In this capacity he is frequently consulted by clients and aviation services firms across Canada to advise on taxefficient acquisition and ownership structures for aircraft, to review aircraft ownership structures and usage policies for tax risk, and for representation in aircraft-related audits and tax disputes. Steven also has extensive



experience in advising vendors, purchasers, and financiers of aircraft as regards the Select Luxury Items Tax Act (i.e., the Canadian luxury tax).

Steven regularly represents both corporate and individual clients in tax disputes with the federal and provincial tax authorities. A member of both the Québec and Ontario bars, Steven fulfilled his articling requirements as a law clerk to the judges of the Tax Court of Canada.

Email: steven.sitcoff@mcmillan.ca

Expertise: Aviation, Business Law, Tax

Language Spoken: English, French

LinkedIn: https://www.linkedin.com/in/steven-sitcoff-b66a8121/

Location: Montréal **Phone:** 514.987.5085

Position/Title: Partner, Tax Community Involvement:

- Chair of the Innovations Committee of the Jewish Community Foundation of Montréal: 2013 to present
- 2019 West Island Campaign Chair, Federation-CJA (Montréal)
- Member of the Board of Directors and Secretary to the Board of West Island College: 2015 to 2022
- Board Member, Jewish Community Foundation of Montréal: 2008-2013

Directorships & Affiliations:

- Le Barreau du Québec
- Law Society of Ontario
- Canadian Tax Foundation (CTF)
- International Fiscal Association
- Canadian Business Aviation Association

Publications:

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- "Facing the Aircraft Luxury Tax," Wings Magazine (March/April 2023)
- "Not yet cleared for takeoff," Wings Magazine (May/June 2022)
- "Inside Canada's proposed luxury tax," Wings Magazine, p. 24-26 (September/October 2021)
- "So, you want to buy an aircraft? Tips from a lawyer," Skies Magazine (February 5, 2021)
- "CRA's New Tax Policy on Business Aviation: One Year Later," Wings Magazine (May/June 2019)
- "CRA's new policy on personal use of bizjets What you need to know about the personal use of corporate aircraft," Wings Magazine (May 2018)
- "Sorting out the details," Wings Magazine (October 26, 2017)
- "Voluntary Tax Disclosures: Dispelling the Myths," The Gazette (October 27, 2011)
- "TESCM Planning," Canadian Tax Highlights, vol. 19, No. 2 (February 2011)
- "Transaction Costs Revisited," Canadian Tax Highlights, vol. 11, No. 5 (May, 2003)
- "Stock Option Terminated," Canadian Tax Highlights, vol. 9, No. 1 (January 23, 2001)

Education & Admissions:

Degree: Called to the Québec bar

Year: 2007

Degree: Called to the Ontario bar

Year: 1998

Degree: LLB

University: Queen's University

Year: 1996

Degree: BA

University: McGill University

Year: 1993

Media Mentions:

- "Best practices for deploying cross-border remote worker," by John Dujay, Canadian HR Reporter, November 6, 2023
- "<u>Uphill Battle Canada's Luxury Tax Is So Far Having a Dramatic Impact On Aircraft Sales</u>," Skies Magazine, June/July 2023
- "How does the alternative tax measure work, really?" by Salmaan Farooqui, The Globe and Mail, April 9,



2023

- "CBAA makes headway on taxation issue," Skies Magazine, June 28, 2018
- "CBAA musters the troops in response to taxable benefits proposal," Skies Magazine, August 15, 2017

Rankings & Recognition:

- Recognized in the 2024 Canadian Legal Lexpert Directory as a Repeatedly Recommended Lawyer in the area of Aviation (Regulation & Liability)
- Recognized in the 2023 Canadian Legal Lexpert Directory as a Repeatedly Recommended Lawyer in the area of Aviation

Speaking Engagements:

- Speaker, Mitigating the Impact of the Luxury Tax, the 2023 National Convention of the Canadian Business Aviation Association
- **-** July 13, 2023
- https://us02web.zoom.us/webinar/register/WN_k2Qd4szzTXuQzRi84VOkjw
- Speaker, The Canadian Luxury Tax: Tips for buyers and sellers of aircraft, WINGS Magazine Webinar
- May 16, 2023
- https://us02web.zoom.us/webinar/register/WN_k2Qd4szzTXuQzRi84VOkjw
- Tax and Legal Considerations for Aircraft Owners, the 2022 National Convention of the Canadian Business Aviation Association
- June 15, 2022
- Speaker, Inside the Aircraft Luxury Tax, WINGS Magazine Webinar
- November 30, 2021
- https://us02web.zoom.us/webinar/register/WN_k2Qd4szzTXuQzRi84VOkjw
- Co-presenter, Tax and financial planning for business aircraft owners, 2019 National Convention of the Canadian Business Aviation Association
- **-** July 10, 2019



- Co-presenter, How to manage the impact of CRA's new tax policy, 2018 National Convention of the Canadian Business Aviation Association
- **-** June 14, 2018
- Co-presenter, Tax Planning for Your Business Aircraft, 2017 National Convention of the Canadian Business Aviation Association
- August 11, 2017
- Co-presenter, Taxation of personal use of business aircraft, Webinar to the Canadian Business Aviation Association
- July 15, 2017
- Co-presenter, Taxation of personal use of business aircraft, Webinar to the Canadian Business Aviation Association
- April 28, 2016

Representative Matters:

- Planning and executing tax-efficient strategies for the selling shareholders of a national retail chain
- Planning and executing tax-efficient structures for Canadian companies expanding abroad, as well as for multinationals inbound to Canada
- Advising public and private companies on establishing formal policies governing the use of corporate aircraft
- Tax planning for acquisitions and divestitures, including structuring earn-out transactions and other taxefficient strategies for vendors
- Tax planning for individuals immigrating to or departing Canada
- Extensive experience in representing clients with regard to the voluntary disclosure programs of both the Canada Revenue Agency and Revenue Québec, especially as pertains to offshore bank accounts

Industries: Aviation

Practices: Business Law, Tax