
PERSONAL TAX PLANNING

Co-Editors: P.E. Schusheim* and Gena Katz**

With this issue of the journal, we welcome Gena Katz, CA, CFP, as co-editor of the Personal Tax Planning feature. Ms. Katz is executive director of Ernst & Young LLP's Tax Knowledge (formerly National Tax) group in Toronto. She received her CA in 1982 and has been part of the firm's tax practice since 1985, providing service in a variety of areas, including personal tax, financial planning, corporate tax, and tax education. She has written and spoken widely on tax-related matters and has been a contributor to the Personal Tax Planning feature of this journal for several years.

The Canadian Tax Foundation and its members extend their heartfelt thanks for outstanding service to Thomas R. Burpee, CA, retired from the Montreal office of Ernst & Young LLP, who is stepping down as co-editor of the Personal Tax Planning feature. Beginning with the no. 6, 1997 issue of the journal, Mr. Burpee's enthusiastic dedication to the feature has attracted a devoted readership, no doubt because the analyses have been topical, the articles have been prepared with care, and the material has been a regular source of information in an important area of interest to taxpayers and their advisers.

TAXATION OF PROFESSIONAL ATHLETES: CROSS-BORDER PERSPECTIVES

Bruce Sprague***

Before signing with a professional sports franchise, an athlete has many issues to consider, and tax considerations may be among the last. That said, the tax implications can be significant, as well as complex, particularly where the tax laws of two or more jurisdictions may apply. This article addresses a number of tax issues, both us and Canadian, that may arise for a professional athlete, at the moment of signing the professional contract, throughout his or her career, and on retirement.

These cross-border tax considerations, together with the undue compliance burden imposed by many us states (and some cities), highlight some of the complexities of professional sports in the 21st century.

KEYWORDS: ATHLETES ■ TAXATION ■ CANADA/US ■ CROSS BORDER ■ TAX TREATIES ■ RESIDENCY

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