



Frédérique Duchesne

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[Insolvency & Restructuring](#)
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Frédérique's practice focuses on banking law, insolvency, financial restructuring and tax litigation.

She advises both financial institutions and public and private companies with respect to the enforcement of security and personal guarantees, the negotiation of forbearance agreements and various insolvency-related issues.

Frédérique also advises clients on regulatory compliance matters involving municipal and environmental law, and has helped clients with access to information requests. She represents clients before all courts in civil, administrative and penal matters.

Experience

- **Kone inc. c. ARQ**, 2022 QCCQ 9892 — Represented Kone Inc. in a successful appeal of tax assessments issued by Revenu Québec which imputed interest income totaling \$75 million on the basis that the underlying sale and repurchase agreements were sham transactions and were subject to Québec's General Anti-Avoidance Rule. Currently representing the taxpayer in ARQ's appeal to the Québec Court of Appeal.

Insights & Events

- Author, "Cross-border repo: Not a sham, nor an abuse under Québec's Taxation Act", BLG Article, January 2023
- Author, "SCC dismisses appeal regarding tax treatment of donated employee stock options under Québec's Taxation Act", BLG Article, December 2022
- Co-Author, "[Correcting Taxpayer Mistakes in Quebec Post-Collins](#)," Volume 3, Number 4, CFT Perspectives on Tax Law & Policy, December 2022.
- Author, "Proposed amendments to the Income Tax Act: reportable and notifiable transactions", BLG Article, October 2022

Bar Admission & Education

- Ontario, 2017
- Québec, 2017
- JD, University of Ottawa, 2015
- LL.L., University of Ottawa, 2014

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