Chartered Institute of
Professional Certifications
1006 N Rexford Street
Beverly Hills, CA 90210

Date

Dear {Manager},

I am requesting your approval to enroll in the Canada International Tax Planning and Structuring program, an investment that will sharpen my ability to detect cross-border tax risks earlier and convert complex technical issues into commercially sound recommendations. As international tax rules grow more complex and enforcement intensifies, deeper expertise in treaty planning, structuring, transfer pricing, and tax controversy will enable me to assess exposures with greater precision, evaluate alternatives decisively, and support better-informed business decisions.

Led by Natalie Yunes, a seasoned Canadian tax executive and international tax specialist, the program delivers practical, expert-led coverage of the issues that determine cross-border tax outcomes. I will build sharper judgment in evaluating investment structures, related-party transactions, and financing arrangements, supported by in-depth coverage of transfer pricing documentation, EIFEL, and tax due diligence. The program also addresses GAAR, BEPS, Pillar Two, international reporting, and CRA dispute management, equipping me to flag issues sooner, prepare robust, defensible documentation, and respond with confidence to audits or reassessments. The key skills I will gain include:

- Cross-Border Structuring & Investment Analysis
- Tax Treaty & Permanent Establishment Analysis
- Foreign Affiliate & FAPI Assessment
- Transfer Pricing & Related-Party Transaction Strategy
- Cross-Border Financing & M&A Tax Review
- International Tax Compliance, Audit & Dispute Readiness

These capabilities will deliver tangible value to both my role and the organization. Upon completion, I will be fully equipped to assess cross-border structures before decisions are finalized, challenge external advice more rigorously, close documentation and compliance gaps earlier, and translate complex tax issues into clear, actionable recommendations for stakeholders. I will also share the core frameworks and practical takeaways with relevant colleagues, extending the return on this training well beyond my own role.

I would be grateful for your approval to attend this virtual program, and I am committed to applying what I learn directly to our cross-border tax and transaction work.

Sincerely,
Your Name