

FORM 82(4)B

**AFFIDAVIT OF DOCUMENTS
(CORPORATION OR CANADA REVENUE AGENCY)**

TAX COURT OF CANADA

BETWEEN:

(name)

Appellant,

and

HIS MAJESTY THE KING,

Respondent.

AFFIDAVIT OF DOCUMENTS

I, (full name of deponent), of the (City, Town, etc.) of, in the (Province, Territory, etc.) of....., MAKE OATH AND SAY (or AFFIRM):

1. I am the (state the position held by the deponent in the corporation or the Canada Revenue Agency) of the appellant (or as may be) in this action.
2. Now shown to me and marked Exhibit "A" to this affidavit is a list of documents.
3. I have conducted a diligent search of the corporation's (or the Canada Revenue Agency's) records and made appropriate enquiries of others to inform myself in order to make this affidavit. This affidavit discloses, to the full extent of my knowledge, information and belief, all documents relevant to any matter in question in this action that are or have been in the possession, control or power of the corporation (or the Canada Revenue Agency).
4. I have listed in Schedule A those documents that are in the possession, control or power of the corporation (or the Canada Revenue Agency) and that it (or the Minister) does not object to producing for inspection.
5. I have listed in Schedule B those documents that are or were in the possession, control or power of the corporation (or the Canada Revenue Agency) and that it (or the Minister) objects to producing because they are privileged, and I have stated in Schedule B the grounds for each such claim.
6. I have listed in Schedule C those documents that were formerly in the possession, control or power of the corporation (or the Canada Revenue Agency) but are no longer in its possession, control or power and I have stated in Schedule C when and how it lost possession or control of or power over them and their present location.
7. The corporation (or the Canada Revenue Agency) has never had in its possession, control or power any documents relevant to any matter in question in this proceeding other than those listed in Schedules A, B and C.

SWORN or AFFIRMED

(Signature of deponent)

(FORM AS AMENDED BY SOR/2004-100, s. 36; SOR/2007-142, s. 27; SOR/2008-303, s. 27.)