

## Tax

Our lawyers advise on all areas of federal and provincial taxation. We have extensive experience advising Canadian and international clients on mergers and acquisitions, reorganizations, business and investment structuring, financings, securities offerings, executive compensation and other employment-related issues, individual and estate taxation planning, and a broad range of corporate matters including business and partnership taxation.

WeirFoulds also represents clients at every stage of the dispute resolution process, from audits through to administrative appeals and at every level of court, including the Supreme Court of Canada. Confident in our ability to produce results, we regularly offer clients contingency or success fee billing alternatives if they wish to shift some of the risk to us.

Our lawyers regularly present on income taxation topics at conferences and other venues, and have been quoted in national publications on income taxation matters.

If you would like to speak to one of our lawyers, please contact [Ryan Morris](#).

## Lawyers and professionals in this area



**Ryan Morris**

Partner

416.947.5001

rmorris@weirfoulds.com



**Jeff Cowan**

Counsel

416.947.5007

jcowan@weirfoulds.com



**Michael Ding**

Partner

416.619.2096

mding@weirfoulds.com



**Lucinda (Lucy) E. Main**

Partner

647.715.3568

lmain@weirfoulds.com



**Gregory Richards**

Counsel

416.947.5031

grichards@weirfoulds.com

## Areas of Expertise

- Business taxation
- Charities and not-for-profit taxation
- GST/HST
- Employment-related issues
- Estate planning
- International (inbound and outbound) taxation planning
- Mergers and acquisitions
- Partnership taxation
- Personal taxation
- Reorganizations and restructurings
- Structuring and advising on securities offerings
- Compliance advisory services
- Litigation & dispute resolution
- Transfer pricing

## Representative Experience

Tax Dispute Resolution

- Make voluntary disclosures to head-off disputes and protect against penalties and prosecution
- Seek rectification or other remedies to avoid or assist with tax disputes
- Help clients manage tax audits and respond to auditors
- Represent clients with administrative appeals and at every level of court

#### Business Taxation

- Work seamlessly as part of a multidisciplinary team to advise on the taxation aspects of business acquisitions, divestitures, reorganizations and restructurings
- Provide advice on a broad range of taxation matters of importance to Canadian and foreign business entities, including mining and resource taxation, and tax aspects of financings, structured investment products and employment compensation

#### Cross-Border Taxation

- Advise on investments, and expansion of businesses, into and out of Canada, including with respect to transfer pricing and withholding tax obligations
- Advise on cross-border debt and equity offerings
- Advise on tax aspects of the cross-border movement of employees and the immigration and emigration of individuals

#### Owner Manager Taxation and Estate Planning

- Advise on and assist with implementing estate freezes
- Advise on capital gains exemption planning
- Advise on succession planning
- Advise on and assist with implementing post-mortem tax plans

#### Sales and Commodity Taxation

- Advise on customs duties, harmonized sales tax (HST), goods and services tax (GST), federal excise tax and duties, provincial land transfer taxes, and other provincial taxes, such as mining taxes

#### Charities, NPOs and tax-exempt organizations

- Assist charities in becoming and staying registered
- Assist organizations achieving and maintaining not-for-profit or tax-exempt status

**WeirFoulds**LLP

[www.weirfoulds.com](http://www.weirfoulds.com)

#### Toronto Office

4100 – 66 Wellington Street West  
PO Box 35, TD Bank Tower  
Toronto, ON M5K 1B7

Tel: 416.365.1110  
Fax: 416.365.1876

#### Oakville Office

1320 Cornwall Rd., Suite 201  
Oakville, ON L6J 7W5

Tel: 416.365.1110  
Fax: 905.829.2035