

Tax Controversy and Litigation

Our tax controversy and litigation lawyers have extensive experience in dealing with all levels of the Canadian tax authorities, the tax dispute process and all phases of tax controversy.



Overview

Our team is ranked as a Tier 1 Firm for Tax Controversy in *World Tax* 2022 and has broad experience in all phases of tax controversy—from the planning and implementation of transactions, to tax filings, audits, assessments, litigation and appeals. Throughout the process, we bring sophisticated tax advice together with effective advocacy to guide clients in their dispute resolution.

In the audit process, we help clients develop sound disclosure strategies and marshal compelling advocacy and messaging. When assessments are issued, we help prepare submissions to relevant authorities, as well as provide advice for audits and where necessary, we engage in litigation. We work closely with our commercial litigation lawyers on cases that fall at the intersection of judicial review and tax law, in a collaborative way that plays to the diversity of our strengths.

PRIMARY CONTACT



Martha MacDonald



They bring a team approach to complex matters to get to the best result for their clients.

— CHAMBERS CANADA, 2023

Latest Insights

Rules of engagement: Ontario Civil Rules Review proposes overhaul of civil procedure

Proposed framework will impact nearly all aspects of civil litigation in Ontario.

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A Kafkaesque tax quagmire: why we need to defer or abandon the failed capital gains changes

Tax partner John Tobin has co-authored a piece with the C.D. Howe Institute.

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CRA requests for lawyers' trust ledgers

Recent civil litigation decision may strengthen protections for lawyers' accounting records.

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Budget Implementation Act, 2024, No. 1: proposed legislative amendments relevant to financial services regulation

Proposed legislative amendments in the *Budget Implementation Act, 2024, No. 1* aim to crack down on criminal lending.

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Budget 2024: tax highlights

Torys' Tax Practice provides their commentary on some of the most important highlights from the federal government's 2024 budget.

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Managing disputes in Canada and the U.S.: Limitations of liability clauses

The business you just bought has unforeseen problems. Can you hold the seller liable? Get our cross-border take on liability in your commercial contracts.

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Recent Recognition

[Tier 1 in Tax, Tax Controversy, and Transactional Tax \(International Tax Review, 2025\)](#)

[Canada Tax Firm of the Year \(2023\)](#)

Recent News

23 Torys litigators recognized in the 2025 *Benchmark Litigation* guide

This recognition is a testament to our lawyers' considerable achievements and impact on the legal landscape.

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John Tobin receives the 2025 OBA Award of Excellence in Taxation Law

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New report calls on government to abandon capital gains inclusion rate increases

Tax partner John Tobin co-authored the report with the C.D. Howe Institute.

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81% of Torys' Canadian partners ranked by *Chambers Canada*

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179 Torys lawyers recognized in the 2025 *Best Lawyers* guide

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ITR World Tax ranks Torys Tier 1 in three practice areas

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