

## TDS Successful in Clients' Tax Court Appeal of Millions of Dollars Worth of Gross Negligence Penalties

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Thompson Dorfman Sweatman LLP Partner **Jeff Pniowsky** has successfully argued a landmark case before The Tax Court of Canada with the court issuing a scathing 52-page decision.

The decision allows the appeals of three TDS clients facing millions of dollars worth of gross negligence penalties, in full with costs against the Canada Revenue Agency (CRA), without having a trial on the merits of the case. The court fully accepted Pniowsky's position that the CRA egregiously breached multiple court orders and intentionally denied taxpayers their basic rights to know the Crown's case in discovery, via a litany of wrongful and evasive tactics.



**Read the full decision on the Tax Court of Canada website.**

**Read the full TDS news release on the Tax Court of Canada decision.**

Jeff is a partner with TDS who focuses his practice in the areas of tax litigation and dispute resolution in the tax audit and appeals process, tax advisory services, as well as complex commercial litigation.

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