

## Jeffrey D. Pniowsky joins TDS Tax and Litigation Practice

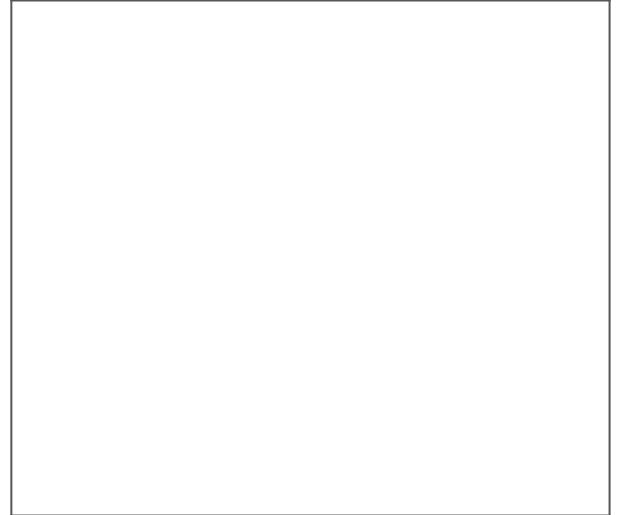
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Formerly a senior Tax Litigator with the Federal Department of Justice for almost 10 years, Jeff focuses his practice in the areas of tax litigation and other complex commercial litigation, as well as tax planning and advisory services.

Now serving local and national clients, Jeff brings a wealth of experience in litigating at all levels of both the Provincial and Federal courts. Acting on behalf of the Canada Revenue Agency (CRA) Jeff has handled more than 300 income tax, general commercial and bankruptcy matters.

His work has included challenges to complex tax avoidance techniques involving large corporate transactions, international taxation and interpretation of tax treaties. Most recently, Jeff had been advising the Aggressive Tax Planning Division of CRA involving some of the most significant tax matters in the Prairie region. He also sat on the National Tax Avoidance Committee for Justice Canada.

In addition, Jeff has extensive experience dealing with tax enforcement and other regulatory compliance issues including document disclosure requirements. Jeff sat on the National Documentary Requirements Committee. He is also considered an authority on solicitor and client privilege issues relating to documentary disclosure, having litigated several matters in this area as well as being called upon to act as an adjudicator in a privilege determination.



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