



## Anne-Sophie Villeneuve

Partner

### Office

Montréal

### Tel

514.841.6578

### Email

asvilleneuve@dwpv.com

### Expertise

Tax Disputes

Tax

### Bar Admissions

Québec, 2016

Anne-Sophie provides thoughtful and effective advocacy for her clients' tax disputes – both in and outside of court.

Anne-Sophie has a record of success acting for clients on all aspects of their disputes with federal and provincial authorities, from audits to appeals to judicial reviews. She regularly represents clients before the Tax Court of Canada, the Federal Court, the Federal Court of Appeal, the Court of Québec and the Québec Court of Appeal. Her domestic and cross-border clients include high net worth individuals and businesses from a range of industry sectors, including railways, construction and real estate.

## REPRESENTATIVE WORK

### Individuals

Acted for individuals before the Tax Court of Canada in their dispute against the Canada Revenue Agency with respect to the purported application of the General Anti-Avoidance Rule following the intergenerational transfer of their business.

### The Federal Republic of Nigeria

Acting on behalf of the Federal Republic of Nigeria in Canadian proceedings involving the country's efforts to recover assets, including a private jet, from the key figure in the "Malabu Oil Scandal," one of Africa's biggest corruption cases.

### National Bank of Canada

Successfully represented National Bank of Canada before the Court of Québec in proceedings against Revenu Québec, concerning the computation of the tax on capital as it applied to financial institutions during the relevant period.

### George Markou et al.

Acted for George Markou and a group of over 250 taxpayers before the Supreme Court of Canada (leave application), Federal Court of Appeal and the Tax Court of Canada in a matter relating to charitable donations made between 2001 and 2003 to the John McKellar Charitable Foundation, for which donation tax credits have been denied by the Canada Revenue Agency. The case has generated a number of derivative and interlocutory actions before the Tax Court of Canada and the Federal Court.

### Hillcore Financial Corporation

Acting for Hillcore Financial Corporation and related entities (the Taxpayers) in their dispute before the Tax Court of Canada with respect to trading in foreign exchange derivative contracts and other related disputes.

### Private Equity Firm

Representing a private equity group before the Tax Court of Canada in connection with a dispute involving foreign exchange forward contracts in what is commonly referred to as "straddle" trading undertaken by a substantial number of taxpayers.

# DAVIES

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## Via Rail Canada Inc.

Acting for Via Rail Canada Inc. in connection with a fuel tax dispute with the Canada Revenue Agency.

## RECOGNITIONS

McGill University–Maxwell Cohen Award; Wilson Lafleur Award (2015)

## INSIGHTS

Federal Court of Appeal Confirms CRA Can Collect Arrears Interest Despite Absence of a Tax Debt  
Dec. 04, 2024

Canadian Tax Foundation, “Objection! Or how to ensure legal evidence”;  
Montréal, QC  
Oct. 17, 2024

Association de planification fiscale et financière, “Règles particulières anti-évitement”; Montréal, QC  
Sept. 24, 2024

Association de planification fiscale et financière, 2022 Annual Conference, “Relève Montréal – traitement fiscal des paiements incitatifs à la location”;  
Webinar  
Oct. 05, 2022

Association de planification fiscale et financière, Annual Conference 2021, “Gestion d’attributs fiscaux et mesures d’aides gouvernementales : stratégies pour éviter les pièges et apprivoiser les nouvelles règles”;  
Webcast  
Oct. 08, 2021

The First Specified Transactions to Be Disclosed to Revenu Québec Announced  
Mar. 24, 2021

Revenu Québec May Seize Records Relating to Accounts Held Outside Québec by Banks Operating in Québec  
July 09, 2019

*Callidus Capital Corporation v HMQ*: Last Word Goes to the Secured Creditor  
Nov. 14, 2018

## EDUCATION

CPA Canada, In-Depth Tax Course  
McGill University, BCL/LLB, 2015

## PROFESSIONAL AFFILIATIONS

Association de planification fiscale et financière  
Canadian Tax Foundation

## COMMUNITY INVOLVEMENT

# DAVIES

## **Anne-Sophie Villeneuve**

Partner

Association de planification fiscale et financière, La Relève Committee, Vice-President

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