DAVIES



Jacob Yau
Partner

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Expertise
Tax
Tax Disputes

Bar Admissions
Ontario, 2016

"His knowledge of the law, business understanding, preparedness and his brilliant tactics were on another level."
Client – *Chambers Canada*

Jacob combines technical tax expertise and strategic thinking to help his clients navigate complex tax disputes. He has argued before the Tax Court of Canada and the Federal Court of Appeal on matters ranging from income tax, excise tax and the general anti-avoidance rule (GAAR), and he has successfully resolved numerous cases before trial. He has also argued before the Federal Court of Canada on judicial review applications and the Ontario Superior Court (Commercial List) on orders for rectification and commercial disputes.

Clients look to Jacob for guidance on voluntary disclosures, tax compliance, audits, objections and appeals. He advises both domestic and international clients on corporate tax, tax planning, M&A, business structuring and reorganizations. In the *Chambers Canada* guide, one client referred to him as "knowledgeable, professional…and dedicated to the client and task. Obviously, and lucky for us, he is a man who takes no prisoners."

Jacob is an active publisher and speaker and is an editor of Federated Press' *International Tax Planning*.

Representative Work

Leading Cinema Operator
Acted for a leading cinema operator in its successful tax dispute with the Canada Revenue Agency in connection with the treatment of the sale of a movie theatre as a capital versus income gain.

High-Net-Worth Client
Acted for a **high-net-worth client** in the successful resolution of their dispute with the Canada Revenue Agency relating to the fair market value rental fee of high value artwork.

Recognitions

Lexpert Special Edition
Litigation

Chambers Canada
Tax: Litigation

Lexpert (CLLD)
Litigation: Corporate Tax

External Engagements

Speaking Engagement
Tax Executive Institute's 57th Annual Canadian Tax Conference, "Tips on Planning and Tax Controversy – Practical Approaches and Pitfalls to Avoid"; Ottawa, ON
May 5, 2025

Speaking Engagement

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Canadian Tax Foundation, 76th Annual Tax Conference, "Audit and Non-Compliance – Where We're At, Where We're Headed"; Vancouver, BC
Dec 2, 2024

In the News
Interview, *Canadian Lawyer Magazine*, **"New CRA audit powers proposed in federal budget raise uncertainty, say Davies tax lawyers"; Web Publication**
May 22, 2024
Read More

Article
Down but not out: Rectification granted by the Ontario Superior Court to correct trust deeds, co-author
Nov 27, 2023
Mondaq
Read More

Speaking Engagement
Canadian Tax Foundation, Celebrating the Tax Court of Canada, "40th Anniversary of the Tax Court of Canada Conference"; Toronto, ON
Oct 5, 2023

Article
Canada Revenue Agency's expanded audit powers: What taxpayers need to know, part two, co-author
Oct 2, 2023
Law360 Canada
Read More

Article
Canada Revenue Agency's expanded audit powers: What taxpayers need to know, part one, co-author
Aug 14, 2023
Law360 Canada
Read More

Article
Emergis v. The King: **Taxpayer Emerges Victorious in Tower Structure Deduction**
Jan 2, 2023
International Tax Planning, Volume XXVII, No. 2

Speaking Engagement
Canadian Tax Foundation, Canadian Tax Foundation Young Practitioners Series, "Case Law Update"; Toronto, ON
Mar 31, 2022

Article
Federal Budget 2022: What you and your clients need to know
Jan 3, 2022
The Lawyer's Daily

Article
Loblaw Financial Holdings—Statutory Interpretation in'One of the Most Complicated Statutory Regimes in Canadian Law'

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Jan 3, 2022
International Tax Planning, Volume XXVI No. 2

Speaking Engagement
Canadian Tax Foundation, 2021 Ontario Tax Conference, "What's New With Section 160?"; Toronto, ON
Oct 26, 2021

Article
Coca-Cola Goes Flat in $9 Billion Transfer-Pricing Loss
Jan 1, 2021
International Tax Planning, Volume XXV No. 1

Article
Bank of Montreal v. The Queen: **When a Disposition of Shares Isn't a Disposition of Shares**
Jan 1, 2020
International Tax Planning, Volume XXIV No. 2

Article
How Specific Is a 'Specific Expense' Under Paragraph 212(4)(B)?
Jan 1, 2020
International Tax Planning, Volume XXIV No. 1

Insights

Lexpert Highlights Davies' Expertise in Litigation
Nov 19, 2026

Lexpert Affirms Davies' Position as a Leading Firm
Mar 17, 2026

Lexpert Recognizes Davies' Excellence in Litigation
Nov 20, 2025

The Proposed Enhancement of CRA's Audit Powers, Part Two: Unpacking the New Non-Compliance Regime
May 24, 2024

The Proposed Enhancement of the CRA's Audit Powers, Part One: Under Penalty of Perjury
May 3, 2024

Federal Budget 2024: How It Impacts You and Your Business
Apr 16, 2024

Education

Osgoode Hall Law School, JD, 2015
Queen's University, BSc (Applied Science, Electrical Engineering), 2007

Bar Admissions

Ontario, 2016

Community Involvement

The Advocates' Society, Practice Group Leader - Tax Litigation Practice Group

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International Tax Planning (Federated Press), Editor

Teaching Engagements

Jacob is an adjunct professor at the University of Toronto Faculty of Law, where he teaches Canadian Income Tax Law to upper-year law students.

Professional Affiliations

The Advocates' Society
Canadian Tax Foundation
International Fiscal Association
Federation of Asian Canadian Lawyers