DAVIES



Élisabeth Robichaud
Partner

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Montréal

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514.841.6520

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erobichaud@dwpv.com

Expertise
Tax
Tax Disputes

Bar Admissions
Québec, 2011

Élisabeth's practice is focused on litigation and the settlement of tax disputes before tax authorities and the courts.

She works on files that raise a wide range of domestic and international issues – namely, cross-border taxation, indirect taxes, trusts, valuation of businesses and real estate property, the general anti-avoidance rule and tax credits. She has acted for clients, appealing tax assessments before the Tax Court of Canada and the Court of Québec, in matters of judicial review before the Federal Court and the Superior Court of Québec, and before several other trial and appellate courts.

Clients turn to Élisabeth for her tenacious and detail-oriented approach to finding solutions to their litigation matters.

Representative Work

Groupe BMTC Inc.
Acting for **Groupe BMTC Inc.** in a consumer class action that tests the intersection of Québec's *Consumer Protection Act*, tax legislation and class action procedure.

Onex Corporation
Acted for **Onex Corporation** in its successful application for judicial review of the amended *Income Tax Act* before the Federal Court of Canada.

NDT Global Corporate
Acted as Canadian tax counsel to Ireland-headquartered **NDT Global**, a leading supplier of ultrasonic pipeline inspection and data analysis, on its sale to Caisse de dépôt et placement du Québec/Novacap-backed Eddyfi Technologies, a Québec-based innovative private test & measurement technology group focused on non-destructive testing (NDT).

Minority Stockholder
Acted for a minority stockholder of a private company in a buyout of the majority stockholder of that company by way of a cross-border acquisition of all the assets of that company through both equity and debt financing from a private equity firm and an institutional lender.

J.G. Guy Simard et al.
Acted for **Colonel J.G. Guy Simard** (retired) and other taxpayers who participated in the "Synergy Program", a program designed to provide funding for start-up businesses, in their dispute before the Tax Court of Canada with the Canada Revenue Agency over the deductibility of related losses. The appeals served as *de facto* representative cases for approximately 4000 other taxpayers who contested potentially over two hundred million dollars in tax deductions.

Recognitions

Benchmark Canada
Litigation Star

Lexpert Rising Stars
Leading Lawyers 40 and Under

Lexpert Special Edition
Litigation

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Lexpert (CLLD)
Litigation: Corporate Tax

Best Lawyers Canada
Tax Law

External Engagements

Speaking Engagement
2026 IFA Canada International Tax Conference, "Current Cases"; Calgary, AB
May 12, 2026

Speaking Engagement
International Fiscal Association, IFA Canada International Tax Conference, "International Case Law"; Toronto, ON
May 27, 2025

Speaking Engagement
Canadian Bar Association, "Les faits saillants du premier quinquennat de Vavilov et ses impacts en matière fiscale"; Montréal, QC
May 13, 2025

Article
Interview, *The Globe and Mail***, "The CRA is getting more audit muscle. Here's why tax experts are concerned"**
May 23, 2024
(Subscribers only)
Read More

Speaking Engagement
Accountants Study Group, "Potpourri of Recent Tax Measures"; Montréal, QC
Nov 7, 2023

In the News
Legal Dilemma
Oct 23, 2023
CBA National, The Canadian Bar Association
Read More

Article
An Avoidable Threat to the Protection of Solicitor-Client Privilege, co-author
Sep 1, 2023
Perspectives on Tax Law & Policy, vol. 4, no 3 (FCF)
Read More

Article
Réflexions sur les amendements proposés à l'article 231.1 L.I.R.
Oct 19, 2022
Stratège, Vol. 27, No. 3 (APFF) (In French)
Download Article

Article
Recent Developments Relating to Registry Rectifications in Québec, co-author
Apr 27, 2022
Stratège Magazine (APFF) Spring 2022, Vol. 27, No. 1 (In French)

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Download Article

Speaking Engagement
Association de planification fiscale et financière, 2022 Tax Administration Seminar, " Compiling and Exchanging Information – Recent Developments"; Webcast
Mar 17, 2022

Speaking Engagement
Association de planification fiscale et financière, Annual Conference 2021, "Ce que vous devriez savoir avant de changer de fiduciaire ou de bénéficiaire de votre fiducie"; Webcast
Oct 8, 2021

Speaking Engagement
Notarial +, "Revenu Québec's Mandatory Disclosure Obligations"; Webinar
Jul 9, 2021

Article
Interest and Penalty Computation For GST: Net Or Gross Liability?, co-author
May 1, 2021
Canadian Tax Focus (CTF) Vol. 11, No. 2
Read More

Speaking Engagement
Revenu Québec and Association de planification fiscale et financière, Tax Administration Conference, "Échanges internationaux d'information – à l'intersection des lois fiscales et des traités"; Webcast
Mar 18, 2021

Article
Invesco Case: Rebate for GST Paid in Error or Notice of Objection?, co-author
Nov 14, 2019
The Lawyer's Daily
Download Article

Article
Invesco Case: Funding Services Not Subject to GST/HST, co-author
Nov 8, 2019
The Lawyer's Daily
Download Article

Article
FC's Surprise Rejection of CRA Data Request
Nov 1, 2018
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Download Article

Insights

Davies Lawyers Recognized by *Best Lawyers*
Sep 3, 2026

Lexpert Affirms Davies' Position as a Leading Firm

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Mar 17, 2026

Lexpert Recognizes Davies' Excellence in Litigation
Nov 20, 2025

Benchmark Litigation Recognizes Davies
May 1, 2025

Federal Court of Appeal Confirms CRA Can Collect Arrears Interest Despite Absence of a Tax Debt
Dec 4, 2024

Government of Canada Releases Package of Proposed Domestic and International Tax Legislation
Aug 16, 2023

The CRA's New Power to Compel Oral Interviews
Jan 17, 2023

Taxpayers Must Pay Interest on Non-Existent Tax Debts
Oct 26, 2021

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

Villa Ste-Rose: FCA Confirms Interest and Penalties Apply After GST Rebates Are Deducted
Mar 2, 2021

Education

Université de Sherbrooke, Graduate Degree in the Prevention and Settlement of disputes, 2018
HEC Montréal, LLM (Tax), 2013
Université de Montréal, LLB, 2006

Bar Admissions

Québec, 2011

Teaching Engagements

Élisabeth teaches the administrative tax law course at HEC Montréal for the Master's program in Law, Taxation option and the postgraduate degree in Taxation.

Board Memberships

Association de planification fiscale, Stratège Magazine Editorial Board, member
MAI (Montréal, arts interculturels), secretary

Professional Affiliations

Association de planification fiscale et financière
Canadian Tax Foundation