



Theo Stathakos
Counsel, Tax Litigation

Vancouver
(778) 785-2734
tstathakos@osler.com

Bar Admission: British Columbia, 2019Alberta, 2014

Areas of Expertise

- [Corporate and Commercial Disputes](#)
- [Energy](#)
- [Insolvency and Restructuring](#)
- [Mining and Natural Resources](#)
- [Tax Disputes](#)
- [Tax Litigation](#)

Theo Stathakos is a litigator with a primary focus on tax disputes. He has over 10 years of experience with audits, objections, and litigation, involving a wide variety of issues, including:

- CRA requirements for information
- Capital v. income disputes
- Tax collection issues (such as section 160 assessments)
- The general anti-avoidance rule
- Statute-barred reassessments
- Deductibility of business losses
- Residence or non-residence in Canada for tax purposes
- Capital cost allowance deductions
- Resource deductions (CEE, CDE, COGPE)
- Scientific research and experimental development credits
- Gross negligence penalties
- Interest cancellation
- Interest deductibility
- Voluntary disclosures
- Goods and services tax

Theo has represented clients in the Tax Court of Canada, Federal Court of Appeal, Federal Court, Alberta Court of King’s Bench, Alberta Court of Appeal, and the British Columbia

Supreme Court.

Before being called to the bar, Theo served a judicial clerkship with the Alberta Court of Appeal. Theo received his J.D. (with Distinction) from the University of Alberta in 2013. He received numerous academic awards in connection with his legal studies including the Judges' Bronze Medal.

Prior to law school, Theo dealt with income tax and GST disputes for over 5 years as an appeals officer and auditor at the Canada Revenue Agency, completed Parts 1 and 2 of the CICA In-Depth Tax Course, and obtained the Chartered Professional Accountant designation. In 2005, he obtained a B.Comm. (Accounting) and a B.A. (Economics) from the University of Calgary.

Theo is a member of the Law Society of British Columbia, the Law Society of Alberta, the Canadian Bar Association, the Canadian Tax Foundation, the Chartered Professional Accountants of Alberta, and the Chartered Professional Accountants of Canada

Community Involvement

- Volunteer Lawyer, Court Assistance Program, Pro Bono Law Alberta

Credentials

Education

- University of Alberta, J.D.
- University of Calgary, B.Comm.
- University of Calgary, B.A.

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Languages

- English
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Professional Affiliations

- Law Society of British Columbia
- Law Society of Alberta

- Canadian Bar Association
- Canadian Tax Foundation
- Chartered Professional Accountants of Alberta
- Chartered Professional Accountants of Canada