

# Robert Nearing

## Partner and National Co-Leader, Tax Group

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Tax
Business Tax
International Tax
Mergers & Acquisitions

Robert's practice focuses primarily on the tax aspects of innovative financing structures, mergers and acquisitions, private equity transactions and complicated reorganizations, including complex cross-border transactions and intra-group restructuring.

He also advises on the structuring of derivative instruments, transfer pricing matters and disputes with domestic and international tax authorities.

Robert has extensive experience advising on private equity transactions, including domestic and cross-border buy-outs, investments, co-investments, fund formation, debt restructuring and related secondary transactions. He supports clients doing business in the U.S. and U.S. businesses expanding into Canada with cross-border transactions and international tax minimization strategies.

## Insights & Events

- Author, "Repurposing flow-through shares to promote innovation", BLG Article, May 2025
- Author, "Preparing for the new EIFEL rules in Canada", BLG Article, January 2023
- Author, "Canada makes welcome amendments to the Income Tax Act for EIFEL rules", BLG Article, December 2022
- Author, "Canada's 2030 Emissions Reduction Plan and the expansion of tax credits for green technology", BLG Article, December 2022

- Speaker, “Income and Commodity Tax Measures from the Recent Federal Budget,” Tax Executive Institute – Calgary Branch, March 20, 2021.
- Presenter, 64th Annual Tax Conference Plenary Session, Canadian Tax Foundation
- Presenter, Outbound Investment and Foreign Exchange Issues, Canadian Electric Association
- Presenter, Anti-treaty Shopping Proposals, Tax Executive Institute
- Presenter, Foreign Affiliate Reorganizations, Canadian Petroleum Tax Society

## Beyond Our Walls

### Professional Involvement

- Member, Canadian Tax Foundation
- Member, Canadian Bar Association (Tax Law Section)
- Member, International Fiscal Association and International Fiscal Association Canadian Council

## Bar Admission & Education

- Alberta, 2005
- British Columbia, 2002
- Nova Scotia, 2002

- BSC, Saint Marys University, 1996
- Joint LLB/MBA, University of New Brunswick, 2001

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