



Tony Zhang

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Tony advises on tax issues affecting various types of investment funds, such as domestic and offshore hedge funds, exchange traded funds (ETFs), mutual funds, pooled funds, private equity funds and other alternative funds. His clients include fund managers, securities dealers, portfolio managers, custodians and other participants of the asset management industry. He has experience with fund launches, acquisitions, securities law disclosure, registered plans, ongoing tax compliance and the use of derivative trading strategies.

Tony's practice also involves corporate income tax matters arising from domestic and cross-border transactions, including mergers, acquisitions, financings, divestitures and reorganizations. He advises on issues affecting both closely-held (e.g., family-owned) and widely-held corporations.

Tony frequently provides advice to financial institutions on their account holder information reporting obligations under the *Common Reporting Standard* and the *Foreign Account Tax Compliance Act*. He also represents taxpayers in their disputes with taxation authorities, such as the Canada Revenue Agency and the Ontario Ministry of Finance.

Prior to joining BLG as an associate, Tony summered and articulated with the firm.

Insights & Events

- Author, "Qualified investment regime overhaul: New opportunities for the investment fund industry", BLG Article, November 2025
- Author, "CRA overhauls the voluntary disclosure program", BLG Article, September 2025
- Author, "Proposal for CRS to impose obligations in respect of crypto, electronic money products and digital currency", BLG Article, September 2025
- Author, "Proposed changes to compliance obligations under CRS", BLG Article, September 2025
- Author, "Mr. Grenon's legendary RRSP and its implications for fund manufacturers", BLG Article, July 2025
- Author, "Mr. Grenon's legendary RRSP and its implications for Registered Plan Trustees", BLG Article, July 2025
- Author, "When is a Financial Institution not a Financial Institution: CRA Announces New Administrative Positions on FATCA/CRS Compliance", BLG Article, April 2024
- The lawyer of tomorrow: 6 BLG associates share what's needed to shine as a lawyer in the future, BLG Perspective, April 2024
- Author, "New trust reporting rules are now in effect", BLG Article, January 2024
- Author, "Finance introduces relief for ETFs from Share Buyback Tax", BLG Article, November 2023
- Author, "2023 Fall Economic Statement – Tax measures", BLG Article, November 2023
- Author, "Preparing for the new EIFEL rules in Canada", BLG Article, January 2023
- Author, "Changes to the CRA's FATCA/CRS guidance for financial accounts held by trusts", BLG Article, December 2022
- Author, "2022 fall economic update – Helping Canadians and tackling inflation", BLG Article, November 2022
- Author, "Winter and FATCA/CRS audits are coming for financial institutions", BLG Article, October 2022
- Author, "Flexible work arrangements: tax, employment & immigration issues", BLG Article, June 2022
- Author, "Latest FATCA/CRS Guidance: What Canadian financial institutions need to know", BLG Article, March 2022
- Author, "Latest FATCA/CRS Guidance: Changes relevant to the asset management industry", BLG Article, March 2022
- Author, "Federal government introduces proposed trust reporting rules", BLG Article, March 2022
- Author, "FATCA and CRS compliance for client name accounts", BLG Article, August 2020
- Author, "Newest developments on FATCA and CRS compliance", BLG Article, August 2020

Beyond Our Walls

Professional Involvement

- Participant, Canadian ETF Association (Tax Committee)
- Participant, The Investment Funds Institute of Canada (Taxation Working Group)
- Member, Ontario Bar Association
- Member, Canadian Tax Foundation

Community Involvement

- Planned Giving Chair, Lifesaving Society of Ontario

Bar Admission & Education

- Ontario, 2022
- JD, Osgoode Hall Law School, 2021
- BBA (Finance and Accounting), Schulich School of Business, 2018

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