



## Bobby B. Solhi

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Bobby Solhi is a Canadian tax lawyer and partner in BLG's Tax Group. Bobby has a national indirect tax practice advising organizations in all industries including real property, technology, retail, logistics, travel, charity/ NPO and the financial services sector. He also maintains a private client practice which includes company formation, tax-driven reorganizations and tax-efficient planning for owners.

In addition to his tax advisory practice, Bobby is an experienced tax litigator representing clients before the Canadian tax authorities and the Courts.

Prior to private practice, Bobby was a Legislation Design Specialist at the Ontario Ministry of Finance where he helped shape tax policy and law including the introduction of the Harmonized Sales Tax.

Bobby is a frequent presenter on tax law matters before accounting, financial, and industry organizations. He is a featured Canadian tax law expert for LexisNexis' Legal Practice Advisor where he has published tax modules on for lawyers involved in corporate and commercial transactions.

Bobby provides legal services through a Law Corporation.

## Experience

- Advising a multinational consumer electronics retailer on the application of GST/HST/PST to its online marketplace and platform operations as well as negotiating with tax authorities across Canada on the application of the tax rules and transitional relief.
- Advising a global travel retailer on the Canadian tax implications to its e-commerce platform operations including implementing changes to consumer terms of use, commercial agreements, and cross-border supplies.
- Acted as a tax advisor to Loblaws on its [\\$875 million acquisition](#) of the Lifemark Health Group to expand Shoppers Drug Marts healthcare services.
- Represented Canadian Premier Life Insurance Company in its acquisition of Gerber Life Insurance Company's Canadian insurance business from U.S.-based Western & Southern Financial Group.
- Advised purchaser on the tax aspects of a successful acquisition of a Canadian bank.
- Acted as tax advisor to Mohegan Gaming and Entertainment on their acquisition of Fallsview Casino and Niagara Falls Entertainment Centre.
- Advised purchaser on the tax aspects of a significant acquisition of agricultural businesses in western Canada.
- Advised on transaction tax related to a successful sale of an educational institution in Canada to private equity investors.
- Advised on application of Carbon Tax to Major Clients in the Energy sector
- Advised on tax aspects of renewal energy projects.
- Advised on tax aspects of a multi-billion-dollar class action settlement.
- Advised on tax structuring of several multi-unit real property developments.
- Advised on tax residency for many foreign clients with Canadian business activities.
- Advised multi-national chemical supplier on tax implications of interprovincial sales.
- Advised multi-national technology firms on tax implications of cross-border technology service/SAS arrangement.
- Acted for foreign technology companies with tax aspects of inbound transactions.
- Acted for automotive suppliers on tax implications of exports and outbound transactions.
- Acted for wholesalers of tobacco products in significant tax dispute.
- Represented various individual and corporate clients in tax disputes at the Tax Court and Federal Court level.

## Insights & Events

- Author, "Canada's enhanced GST Rental Rebate for new rental construction projects", BLG Article, September 2023
- Author, "Hootsuite Inc. v British Columbia: cloud computing services not subject to B.C. PST", BLG Article, April 2023
- Author, "Canada introduces new GST/HST regime for non-resident businesses", BLG Article, April 2021
- Author, "Noteworthy 2020 GST/HST developments for corporate commercial operators", BLG Article, January 2021
- Author, "Noteworthy 2020 GST/HST developments for the Financial Services Industry", BLG Article, January 2021
- Author, "Reconsidering consideration – TCC concludes funding attracts HST in *CanLII v The Queen*", BLG Article, August 2020

- Author, "FCA confirms CRA super priority over secured creditors on a GST/HST debtors' property", BLG Article, May 2020
- Author, "GST/HST remittance deferral: Interest-free "loans" may trigger personal liability", BLG Article, May 2020
- Author, "TCC decision: Merchant services provider exempt from GST/HST", BLG Article, April 2020
- Author, "Important Cross-Border GST/HST Developments from 2019", BLG Article, January 2020
- Author, "Important Financial Services GST/HST Developments from 2019", BLG Article, January 2020
- Author, "Noteworthy GST/HST Decisions in Real Estate from 2019", BLG Article, January 2020
- Author, "SLFI Group — Federal Court of Appeal confirms that funds may unbundle and outsource fund managers' exempt financial services", BLG Article, September 2019
- Author, "Husky Oil – Tax Court Reaffirms Basic Rules of a Pleading", BLG Article, August 2019
- Author, "Non-residents of Canada not required to disclose books and records to the CRA", BLG Article, May 2019
- Author, "GST/HST on Exports From Canada — Ships, Carriers, and Place of Delivery", BLG Article, March 2019
- Author, "Québec's New QST Registration Rules Target Non-Resident Online Vendors and Service Providers", BLG Article, February 2019
- Author, "Important GST/HST Developments in Real Estate Transactions from 2018 ", BLG Article, December 2018
- Author, "Important GST/HST Developments from 2018", BLG Article, December 2018
- Author, "Holiday Parties in the Cannabis Age", BLG Article, December 2018
- Author, "Car Dealership's Sale of Insurance Products Held to be GST/HST Exempt", BLG Article, November 2018
- Author, "Significant Changes To GST/HST Holding Company Rules", BLG Article, August 2018

## Beyond Our Walls

### Professional Involvement

- Member, Ontario Bar Association
- Member, Canadian Tax Foundation

### Community Involvement

- Participant, several charities for children

## Awards & Recognitions

- Recognized in the 2023 edition of *The Legal 500* ([Tax Law](#)).
- Certificate of Achievement, Chartered Professional Accountants (CPA) Canada
- Honourable Paul I.B. and Mrs. Tevis Staniszewski Award
- Millennium Excellence Scholarship

## Bar Admission & Education

- Ontario, 2009



- LLB, Osgoode Hall Law School, 2008
- Specialized GST/HST Financial Services Course, CPA Canada
- In-Depth Tax Course Parts I, II, and III, CPA Canada
- In-Depth HST/GST Course, CICA
- JD, Osgoode Hall Law School, 2008

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