



## Siwei Chen

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Siwei is a corporate tax partner specializing in both domestic and international contexts. With a wealth of experience across various facets of corporate tax, her expertise encompasses:

- Advising on major purchase, sale, and takeover transactions.
- Ensuring optimal tax structuring in corporate reorganizations.
- Guiding clients through cross-border corporate transactions, managing and coordinating tax complexities across multiple jurisdictions.
- Structuring financing arrangements tailored to meet the unique needs and objectives of each client.
- Designing tax structures for non-residents conducting business in Canada, providing strategic solutions to facilitate smooth operations in the Canadian market.

Siwei frequently presents on tax topics and authors tax articles. She has taken on leadership roles in the tax community such as founding a chapter of Ladies of Tax in Calgary, the steering committee for the Canadian Tax Foundation Young Practitioners, and the Young IFA Network (YIN) Committee.

## Experience

- **Pan American Silver Corp. (PAAS)**, in its US\$4.8 billion acquisition of Yamana Gold Inc. shares and spinout of Canadian assets to Agnico-Eagle Mines Limited by way of Plan of Arrangement.
- **POSCO Canada Limited**, in the restructuring of their interest in the Greenhills and Elk Valley coal mines in southeastern British Columbia in exchange for common and preferred shares of Elk Valley Resources Inc. (EVR) and a gross revenue royalty on steelmaking coal. This transaction was part of the larger restructuring of **Teck Resources Limited**, into two independent, publicly-listed companies: Teck Metals Corp. and EVR.
- **Berkshire Hathaway Energy Company (BHE)**, in its indirect share purchase acquisition of the Montana Alberta Tie-Line from Enbridge Inc. for an approximate purchase price of \$200M.
- Advising international private equity funds on the acquisition of Canadian businesses.
- Numerous public and private corporations on share purchase and asset purchase transactions.

## Insights & Events

- Author, "Important income tax considerations for foreign residents working in Canada", BLG Article, April 2024
- Co-Presenter, "Due Diligence Reviews – Two Perspectives," Canadian Tax Foundation Young Practitioner, February 2023.
- Author, ["Getting ready for EIFEL rules: Part two."](#) The Lawyer's Daily, January 2023.
- Author, ["Getting ready for EIFEL rules."](#) The Lawyer's Daily, January 2023.
- Author, "Preparing for the new EIFEL rules in Canada", BLG Article, January 2023
- Author, "CRA Clarifies its Concession on Earnout Requirements," Corporate Finance, Federated Press Volume XXV, No. 4, 2022
- Author, "2022 fall economic update – Helping Canadians and tackling inflation", BLG Article, November 2022
- Author, "Tax Court of Canada: maximum price not sufficient to create reverse earn-out", BLG Article, October 2022
- Speaker, "Campaign Promises and Tax Policy", Canadian Bar Association (Taxation Section), October 12, 2021.
- Speaker, "Federal Election: From Promises to Reality?", CPTS Fall Lecture Series, September 29, 2021.
- Author, "Same, same but different: U.S. business and the 2021 Canadian election", BLG Article, September 2021
- Speaker, "Income and Commodity Tax Measures from the Recent Federal Budget," Tax Executive Institute – Calgary Branch, March 20, 2021.
- Presentation, "A Primer on the Process and Purpose of Tax Due Diligence," Canadian Bar Association (Tax Non-Specialist Section), February 4, 2021.
- Co-author, ["Federal Court of Appeal upholds application of anti-avoidance rule to limited partner \(Part II\),"](#) *The Lawyer's Daily*, November 2020.
- Co-author, ["Federal Court of Appeal upholds application of anti-avoidance rule to limited partner,"](#) *The Lawyer's Daily*, November 2020
- Author, "FCA confirms GAAR applies to limited partner capital dividend tax plan", BLG Article, October 2020
- Author, "U.S. releases anti-hybrid regulations", BLG Article, May 2020
- Author, "COVID-19: Top five tax questions for individuals and businesses answered", BLG Article, March 2020

- Presentation, "Recent Transactions of Interest," Canadian Petroleum Tax Society 2019 Annual Conference, June 6, 2019.
- Co-author, "Make No Mistake About It: Odds of Rectification Severely Limited," Canadian Tax Journal, April 2017

## Beyond Our Walls

### Professional Involvement

- Member, American Bar Association
- Member, Law Society of Alberta
- Member, Canadian Tax Foundation
- Member, International Fiscal Association (IFA)
- Member, Canadian Bar Association – Taxation Law Section
- Member, CPTS
- Member, Calgary Bar Association

### Community Involvement

- Member, Ladies of Tax, Calgary (2017-Present)
- Co-Chair, BLG United Way Campaign (2022)
- Secretary, Marda Loop Communities Association (2021 - 2023)
- Director (Sports and Recreation Committee Chair), Marda Loop Communities Association (2019 - 2021)
- Steering Committee, Canadian Tax Foundation Young Practitioners (2022 - 2023)
- Committee Member, Young IFA Network (YIN) Canada Committee (2022 – 2023)
- Steering Committee and Women of IFA Network (WIN) Liaison, Young IFA Network (YIN) Canada (2022 - 2023)

## Bar Admission & Education

- Alberta, 2016
- JD, University of Alberta, 2015
- B.Sc. (with Distinction), University of Alberta, 2012

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