



# Robert W. Nearing

Partner

Calgary

[rnearing@mccarthy.ca](mailto:rnearing@mccarthy.ca)

t. 403-260-3678

## Bar Admission

Alberta 2005  
British Columbia 2002  
Nova Scotia 2002

## Law School

University of New Brunswick

## Practices

Tax Planning  
Mergers & Acquisitions  
Tax Disputes

## Industries

Energy & Infrastructure  
Oil & Gas

Robert Nearing is a partner in the firm's Tax Group in Calgary. His practice focuses primarily on the tax aspects of innovative financing structures, mergers, 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.

In 2013, he was named among *Lexpert* magazine's Rising Stars: Leading Lawyers Under 40.

Robert is a member of the CBA/CPA Joint Committee on Taxation, The Canadian Bar Association (Tax Law Section), the Canadian Tax Foundation and the International Fiscal Association.

## PRESENTATIONS & PUBLICATIONS

- 2016 BEPS Symposium: A Canadian Perspective
- 2015 IFA International Tax Conference
- Co-author of Carswell's Canada Tax Service Foreign Affiliates Guide.
- Presented on the anti-treaty shopping proposal to the Tax Executive Institute.
- Presented at the "Current Cases" plenary session of the 64th Annual Tax Conference hosted by the Canadian Tax Foundation.
- Presented on outbound investment and foreign exchange issues to the Canadian Electricity Association.
- Presented on income fund conversions to corporations at the 2009 Canadian Petroleum Tax Society Annual Conference and presented a workshop at the 2008 Canadian Tax Foundation Annual Conference titled "Acquisition Structures for Tax Exempt Entities".
- Presented on foreign affiliate reorganizations to the Canadian Petroleum Tax Society, as well as other seminars hosted by the Tax Executive Institute, the Canadian Bar Association and the Pacific Business and Law Institute.
- Published in the Canadian Petroleum Tax Journal, Canadian Tax Highlights, Tax Litigation and *Lexpert*.

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## Awards & Rankings

**Lexpert - 2013**

Rising Stars: Top Lawyers Under 40

## Recent Experience

- **Oncolytics Biotech completes US\$3.7M offering of units**  
August 16, 2019
- **Newcrest Mining acquires a 70% joint venture interest in Red Chris copper and gold mine in British Columbia from Imperial Metals for US\$804M**  
August 15, 2019
- **American Metals & Coal International and Riverstone Holdings purchase 90% interest in Ridley Terminal Inc. for C\$350M**
- **EPCOR Utilities Inc. completes C\$450M public offering of notes**  
July 08, 2019

## Recent Insights

- **2019 Canadian Federal Budget Commentary – Tax Initiatives**  
March 20, 2019
- **2019 Canadian Federal Budget Commentary – Tax Initiatives**  
March 20, 2019
- **2018 CANADIAN FEDERAL BUDGET COMMENTARY – TAX INITIATIVES**  
February 28, 2018
- **2017 CANADIAN FEDERAL BUDGET COMMENTARY – TAX INITIATIVES**  
March 22, 2017