

Reinhold G. Krahn

Reinhold advises clients on both international and domestic income taxation matters, mergers and acquisitions, corporate finance, corporate reorganizations, and cross-border transactions. He regularly provides taxation and structuring advice to large institutions and pension funds as well as large public and private clients on multi-billion dollar transactions. Reinhold has extensive experience in structuring complex financial transactions relating to investments across Canada, the United States, South America, Europe and Asia in a variety of fields, including resources, real estate and large industry.

Reinhold also has extensive experience in structuring tax efficient investment structures for foreign investors acquiring and making investments and acquisitions in Canada.

Reinhold is a partner in our Vancouver office and is the group leader of our Tax Law group. Prior to practicing law, Reinhold received his B.Sc. (Hon) in Physics from UBC and worked as a physicist in high-temperature superconductivity for a number of years.

Recognition And Ranking

- *Martindale-Hubbell International Law Directory*: BV Peer Review rated
- *Canadian Legal Expert Directory*: repeatedly recommended as a Leading Practitioner for corporate tax
- *Best Lawyers in Canada*: recognized for tax law

Bar Admissions

- British Columbia (1993)

Education

- University of British Columbia (B.Sc., 1988)
- University of British Columbia (LL.B., 1992)

Experience

- Advisor to major western Canadian public sector pension plans and government investment entities with respect to investments in various domestic and international private equity funds and investments
- Advisor to consortium of investors in acquisition of UK water utility assets with transaction value in excess of £8 billion
- Advisor to investors in acquisition of US natural gas fired electricity generating assets with transaction value in excess of \$5 billion
- Advisor to investors in multiple acquisition of partnership interests and other US energy related assets with aggregate transaction values in excess of \$10 billion
- Advisor to Corix (formerly Terasen Water Utility) and group of investors in acquisition of water utility assets



Reinhold G. Krahn

Partner

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Practices

- Business Taxation
- Private Equity and Venture Capital

Reinhold G. Krahn (Cont.)

- Advisor to an investor group acquiring energy related tank and storage assets in Alberta and Saskatchewan
- Advisor and lead tax legal counsel to Westshore Income Fund in the formation of its income fund which, at the time, was the largest income fund in Canada at a \$890 million offering
- Advisor to investors in the acquisition of real estate based assets in Brazil and Mexico
- Advisor to joint venture between Japanese and Canadian pulp and paper companies in corporate reorganization of assets with transaction value exceeding \$1 billion
- Lead tax counsel on numerous M&A transactions consistently involving transactions in the hundreds of millions of dollars
- Assisted provincial governments in the drafting and preparation of taxation legislation including legislation relating to the taxation of the mining and resource sectors
- Advisor on the successful \$1.2 billion takeover of Canadian Hotels Income Properties REIT
- Advisors to both issuing corporations and underwriters with respect to various public offering of securities
- Advisor to mining and resource corporations with respect to mergers, acquisitions and investments in Canadian and foreign resources
- Represented international shipping, trading and manufacturing clients in regard to transfer pricing matters and dispute resolution with the Canada Revenue Agency
- Advisor to multiple income fund trustees on the restructuring of assets
- Advisor to investors located in the PRC in the investment of oil related assets in Alberta
- Advisor to clients in the PRC relating to structuring resource based investments in Canada and the United States

News / Publications

- Proposed Amendments to Section 892 Regulations, (November 2, 2011), Author
- Cross Border Tax Issues, (December 6, 2000)

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