DAVIES



Peter Glicklich
Partner

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New York

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Expertise
Tax

Bar Admissions
Florida, 2017
New York, 1982

Peter's innovative and practical tax advice is informed by his sophisticated knowledge, wide-ranging experience and cross-border expertise.

Managing Partner in New York, Peter has 30 years of experience counselling corporations, institutional investors, banks, and public and private REITs on their international and corporate tax concerns. He advises on the tax implications of mergers and acquisitions, joint ventures, cross-border financings, restructurings, reorganizations, spinoffs and intercompany pricing. Peter also counsels wealthy families and advises on their transformative transactions and intergenerational transfers. Clients trust him to handle tax controversies or to arbitrate tax-related contract disputes arising from transactions.

Peter holds a leadership role in the International Fiscal Association and serves on the advisory boards of a number of prominent industry publications.

REPRESENTATIVE WORK

Granite Real Estate Investment Trust
Acted as tax counsel to Granite REIT in the establishment of a $250-million at-the- market equity distribution program.

Granite Real Estate Investment Trust
Acted as tax counsel to Granite REIT in its $316-million bought deal equity offering of stapled units.

PSP Investments
Acted for PSP Investments in its strategic investment in SitusAMC, the leading provider of services and technology supporting the real estate finance industry.

Power Energy Corporation
Acted for Power Energy Corporation in its acquisition of Nautilus Solar Energy, LLC, a leading U.S. solar developer and asset manager, from management and Virgo Investment Group.

Barrick Gold Corporation
Acted for Barrick Gold Corporation in its recommended US$18.3-billion share-for-share merger with Randgold Resources Limited. This complex and multijurisdictional transaction created an industry-leading gold company with the greatest concentration of tier one gold assets in the industry and a diversified asset portfolio positioned for growth.

Business Development Bank of Canada
Acting for Business Development Bank of Canada in connection with the Government of Canada's Venture Capital Catalyst Initiative, which involves the formation of certain venture capital fund-of-funds. Northleaf Venture Catalyst Fund II, HarbourVest Canada Growth Fund II, Teralys Capital Innovation Fund and Kensington Venture Fund II, four of the five venture capital fund-of-funds established under the VCCI program, had their final closings in 2019.

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Granite Real Estate Investment Trust
Acted as tax counsel to Granite REIT in its sale of a real estate portfolio in the United States and Canada for $400 million.

Northleaf Capital Partners
Acted for Northleaf Capital Partners in connection with the establishment of a US$1.4-billion Northleaf global private credit program and Northleaf's related acquisition, through a new Northleaf-managed investment fund, of a 16% equity stake in Antares Holdings from CPPIB Credit Investments Inc.

InstarAGF Asset Management Inc.
Acted for InstarAGF Asset Management Inc. in connection with the formation of InstarAGF Essential Infrastructure Fund with total equity capital commitments of $740 million.

PSP Investments
Acted for PSP Investments in its strategic initiatives with Pattern Energy Group Inc., including (i) the acquisition of a 9.9% interest in Pattern Energy; (ii) the joint venture between PSP and Pattern Energy to co-invest in various renewable projects; (iii) the joint acquisition with Pattern Energy of a 51% and 49% interest, respectively, in the 179 MW Meikle wind project in British Columbia and the 143 MW Mont Sainte-Marguerite wind project in Québec; and (iv) the acquisition of 49% of the Class B interests held by Pattern in the Panhandle 2 wind project in Texas.

RECOGNITIONS

American College of Tax Counsel—Fellow

New York *Super Lawyers*—Tax; International

American Lawyer's *New York Area's Top Rated Lawyers*

The Best Lawyers in America—Tax Law

Who's Who Legal: Thought Leaders USA: Corporate Tax—Advisory; *Who's Who Legal: Corporate Tax*—Advisory

Bloomberg BNA—International Tax Contributor of the Year (2017)

INSIGHTS

US Corporate AMT: Inbound Investors Beware of Aggregation Rules, co-author
Nov. 15, 2023

US Bill Attacking Foreign DSTs and UTPR Would Hit Canadians, co-author
July 06, 2023

Co-host, International Fiscal Association, 2023 IFA Annual Conference, "Luncheon Fireside Chat with Peter Blessing, the Associate Chief Counsel-International of the IRS and Steven Shay, former Assistant Treasury Secretary for Tax Policy"; Chicago, IL
Apr. 28, 2023

Federal Courts Weigh in on the FBAR: Providing Relief from Outrageous

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Penalties
Mar. 22, 2023

U.S. Tax Laws: A Review of 2022 and a Look Ahead to 2023
Feb. 21, 2023

Disclosure Requirements Aimed at Shell Companies, co-editor
Jan. 24, 2023

Upcoming Proposed Regulatory Changes to Stock Buyback Excise Tax
Dec. 29, 2022

U.S. Climate Change and Healthcare Bill Moves Democrats' Tax Policy Forward
Aug. 18, 2022

Interview, Law360 Tax Authority, "US May Feel Pressure To Enact Int'l Min. Tax Deal, Eventually"
June 10, 2022

Is the Tug of War Between the Senate and the U.S. Administration over BEPS Pillar One Jurisdiction at Least Partially Illusionary?, co-author
Mar. 04, 2022

EDUCATION

Harvard Law School, JD (Cum Laude), 1981
University of Wisconsin–Madison, BA (with Highest Honors), 1977

PROFESSIONAL AFFILIATIONS

American Bar Association
American College of Tax Counsel, Fellow
International Fiscal Association, USA Branch, President
New York State Bar Association

BOARD MEMBERSHIPS

Alliance for Cancer Gene Therapy, Executive Committee Chairman
International Fiscal Association, USA Branch, Executive Committee
International Fiscal Association, Global, Supervisory Board

COMMUNITY INVOLVEMENT

American Bar Association, Tax Section, International Committee
Bloomberg BNA, U.S. International Tax Advisory Board, member and forum chair
Bureau of National Affairs' *Tax Management International Journal*, Advisory Board
Canadian Tax Journal, Advisory Board
Journal of International Taxation, Advisory Board
International Fiscal Association, USA Branch, Vice-President-Central IFA, EC Representative