DAVIES



Sammy Cheaib
Partner

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Expertise
Tax
Tax Disputes
Private Client

Bar Admissions
Québec, 2019

Clients rely on Sammy's thoughtful and practical advice on their complex tax matters.

Sammy's practice focuses on the tax aspects of public and private mergers and acquisitions, including cross-border matters. He works with public and private corporations, tax-exempts and sovereign wealth, private equity, entrepreneurs and high-net-worth individuals, largely based in Canada and the United States. Furthermore, Sammy advises individuals, family offices and private companies on personal estate and tax planning matters.

Representative Work

Velan Inc.
Acted for **Velan Inc.** in connection with the sale by Velan Holding Co. Ltd. of its entire holdings in Velan Inc. for C$204 million to Birch Hill Equity Partners.

PSP Investments
Acting for **PSP Investments** as a co-purchaser in the acquisition of H&R REIT's assets valued at approximately $6.7 billion alongside other co-purchasers including funds affiliated with Blackstone Real Estate and Crestpoint Real Estate Investments. As part of the transaction, PSP Investments and Crestpoint are acquiring the Canadian industrial properties in H&R REIT's portfolio.

Celsius Holdings, Inc.
Acted as Canadian counsel for **Celsius Holdings** in its US$585-million strategic partnership with PepsiCo, including the acquisition of Rockstar Energy® in the U.S. and Canada and the integration of Alani Nu® into PepsiCo's U.S. and Canada distribution network.

Bit Digital, Inc.
Acted for Nasdaq-listed **Bit Digital, Inc.** in its acquisition of Enovum Data Centers Corp., a Montreal-based owner, operator, and developer of high-performance computing datacenters.

eStruxture Data Centers
Acted for **eStruxture Data Centers**, Canada's leading data centre platform, in connection with Fengate Asset Management's record-breaking C$1.8-billion investment transaction. This deal won Digital Infrastructure Acquisition of the Year at the IJInvestor Americas Awards 2024.

ALT 5 Sigma Inc.
Acted as tax counsel to **ALT 5 Sigma Inc.**, a leading next generation blockchain financial technology provider, in its acquisition by JanOne Inc.

Ember Infrastructure Management, LP
Acted for funds managed by **Ember Infrastructure Management, LP**, a New York-based private equity firm, in its $395-million acquisition of H2O Innovation Inc., a TSX-listed company, by way of statutory plan of arrangement under the *Canada Business Corporations Act*, and the associated rollover of shares by Investissement Québec, Caisse de dépôt et placement du Québec and management.

Interactive Validated Solutions 88 Inc.
Acted for the shareholders, including **Desjardins Capital**, **Anges Québec capital**

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and a large group of angel investors, of **Interactive Validated Solutions 88 Inc.**, a company specializing in SaaS quality, compliance and traceability solutions, in its sale to TradeBeyond, a Hong Kong based leading supply chain platform.

HID Global Corporation

Acted for **HID Global**, a subsidiary of Swedish conglomerate Assa Abloy, in its acquisition of Vancouver-based Guard RFID Solutions, a manufacturer of real-time location systems used in healthcare environments.

LKQ Corporation

Acted as Canadian counsel to **LKQ Corporation** in its C$2.8-billion acquisition of Uni-Select Inc.

Psycho Bunny Inc.

Acted for **Psycho Bunny Inc.**, an affiliate of Thread Collective Inc., in connection with a transaction whereby Thread Collective Inc. transferred to Psycho Bunny Inc. all of its assets relating to its Psycho Bunny business and the subsequent investment by The BB Family International Trust in Psycho Bunny Inc.

Sprott Resource Lending Corp.

Acted as tax counsel to **Sprott Resource Lending Corp.**, as lead arranger for its resource lending investment funds, in the financing (of up to US$25 million) of Elemental Royalties' acquisition of a portfolio of precious metal royalties from a wholly owned subsidiary of South32 Limited.

Sprott Resource Lending Corp.

Acted as tax counsel to **Sprott Resource Lending Corp.**, as lead arranger for its resource lending investment funds, in the financing (of up to US$105 million) of Ascot Resources Ltd.'s Premier Gold Project in northern British Columbia. The terms of the financing included a senior credit facility, a convertible credit facility and a production payment agreement.

Nelmar Group

Acted for **the shareholders of Nelmar Security Packing Systems Inc., Plastixx Extrusion Technologies Inc. and Plastixx FFS Technologies Inc.** in the sale of their 100% interest to Balcan Plastics Ltd., a subsidiary of BDT Capital Partners.

Hypertec Infrastructures Inc.

Acted as lead tax counsel for **Hypertec Infrastructures Inc.** in the sale of its data center and colocation services business to Vantage Data Centers, one of the world's leading hyperscale data center providers.

Boutique Linus Inc.

Acted for **Boutique Linus Inc.** which operates Fortnine.ca, a leading Canadian online retailer and distributor in the powersports industry, in a sale of an interest to Novacap.

NDT Global Corporate

Acted as Canadian tax counsel to Ireland-headquartered **NDT Global**, a leading supplier of ultrasonic pipeline inspection and data analysis, on its sale to Caisse de dépôt et placement du Québec/Novacap-backed Eddyfi Technologies, a Québec-based innovative private test & measurement technology group focused on non-destructive testing (NDT).

Hillcore Financial Corporation

Acting for **Hillcore Financial Corporation** and related entities (the Taxpayers) in their

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dispute before the Tax Court of Canada with respect to trading in foreign exchange derivative contracts and other related disputes.

Private Equity Firm

Representing a **private equity group** before the Tax Court of Canada in connection with a dispute involving foreign exchange forward contracts in what is commonly referred to as "straddle" trading undertaken by a substantial number of taxpayers.

Recognitions

Best Lawyers Canada
Tax Law
Ones to Watch

External Engagements

Article
Canada's 'Mega' Tax Proposal Is Signal of ProInvestor Stance, co-author
Oct 26, 2026
Bloomberg Tax (Bloomberg)
Read More

Speaking Engagement
International Fiscal Association, 2024 IFA Canada International Tax Conference, "Worker Mobility - They want to work from where?!"; Montréal, QC
May 14, 2024

Speaking Engagement
Tax Executives Institute, "Mise à jour sur les pouvoirs de vérification de l'ARC"; Montréal, QC
May 31, 2023

Speaking Engagement
International Fiscal Association (U.S. and Canada Branches), YIN Webinar, "Hybridity and Hybrids: Canada's New Anti-hybrid Rules"; Webcast
Mar 9, 2023

Article
FISCALITÉ INTERNATIONALE – Survol général des nouvelles règles d'asymétrie hybride, co-author
Oct 19, 2022
Stratège, Vol. 27, No. 3 (APFF) (In French)
Download Article

Speaking Engagement
Association de planification fiscale et financière, 2022 Annual Conference, "Fiscalité des investissements au Canada par un non-résident"; Webinar
Oct 6, 2022

Article
Novation of Debt and Payment of Accrued Interest
May 1, 2021
Canadian Tax Focus (CTF) Vol. 11, No. 2

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Insights

Federal Budget 2026
Nov 5, 2026

Slate Grocery REIT to be Acquired in US$2.3 Billion Deal
Sep 29, 2026

Davies Lawyers Recognized by *Best Lawyers*
Sep 3, 2026

Northern Super League Announces Seventh Franchise
Jul 15, 2026

Federal Budget 2024: How It Impacts You and Your Business
Apr 16, 2024

The CRA's New Power to Compel Oral Interviews
Jan 17, 2023

Top Court Blesses Treaty-Shopping Arrangement: The*Alta Energy* Decision
Dec 14, 2021

Parliament Votes to Facilitate Intergenerational Business Transfers
Jul 23, 2021

CRA Turns Its Focus to Cryptocurrency Transactions
Apr 13, 2021

Education

McGill University, BCL/LLB, 2018
McGill University, BA (Hons) (Philosophy and Psychology), 2012

Bar Admissions

Québec, 2019

Professional Affiliations

Canadian Tax Foundation
International Fiscal Association