DAVIES



Jonathan M. Rhein
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Expertise
Tax

Bar Admissions
New Jersey, 2014
New York, 2015

Jonathan provides strategic solutions to his clients' complex tax challenges.

Jonathan focuses on providing efficient service with thorough analysis and clear explanation. He advises on the tax aspects of domestic and cross-border mergers and acquisitions, joint ventures, financings, inbound and outbound investments, corporate restructurings and other commercial transactions. His clients value his creativity and his ability to clearly present complicated tax concepts, decision points and negotiation strategy.

Prior to joining Davies, Jonathan practised in New York City at a multinational law firm.

Representative Work

Gould Industries Ltd.

Acted for **Gould Industries Ltd.**, a Montréal-based manufacturer of plastic waste bags, in their purchase of a manufacturing facility in Mississippi.

Agnico Eagle Mines Limited

Acted for **Agnico Eagle Mines Limited** in its C$2.9-billion acquisition, by way of plan of arrangement, of Rupert Resources Ltd., for Agnico Eagle shares and contingent value rights, as part of a comprehensive consolidation of properties in the Central Lapland Greenstone Belt of Northern Finland that establishes Finland as a multi-asset, multi-decade regional platform within Agnico Eagle's portfolio.

Knight Therapeutics International S.A.

Acted for **Knight Therapeutics International S.A.** in negotiating a complex supply and distribution agreement with Eton Pharmaceuticals granting exclusive U.S. commercialization rights for IMPAVIDO, the only FDA-approved oral treatment for certain forms of leishmaniasis.

Canadian Imperial Bank of Commerce

Acted for **Canadian Imperial Bank of Commerce** in connection with the formation of CIBC Diversified Private Credit Fund, an institutional open-ended fund offering access to a diversified portfolio of senior secured, floating-rate loans sourced through CIBC's proprietary origination network.

Aecon Group Inc.

Acted for **Aecon Group Inc.** in its acquisition of Bodell Construction Company, an industrial construction company headquartered in Salt Lake City, Utah.

Wexford Capital LP

Acted for **Wexford Capital LP**, the largest shareholder of Mako Mining Corp., in connection with Wexford's acquisition of Golden Vertex Corp., the owner and operator of the Moss gold mine in Arizona, through a *Companies' Creditors Arrangement Act* insolvency proceeding in Canada and related Chapter 15 proceeding in the United States, and its subsequent sale of Golden Vertex to Mako.

Terra Firma Capital Corporation and Dwight Capital

Acted for **Terra Firma Capital Corporation and Dwight Capital** in the formation of Terra Dwight Residential Credit Fund III, an open-ended fund which facilitates the financing of the acquisition and development of residential land in the U.S.

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Amcor Rigid Plastics USA, Inc.

Acted for **Amcor Rigid Plastics USA, Inc.** in the sale of its 50% interest in Bericap North America, a 50/50 joint venture between Amcor and Germany-based Bericap Holding GmbH that manufactures closures for beverage, food and industrial end markets in the U.S., Canada and Mexico.

Altus Capital Partners, Inc.

Acted for **Altus Capital Partners, Inc.**, a private equity buyout fund based in Connecticut, in its new platform investment – a leveraged buyout of Air Innovations, LLC, a manufacturer of speciality environmental control units for demanding applications.

Groupe Dynamite Inc.

Acted for **Groupe Dynamite Inc.**, a Canadian women's clothing retailer, in its C$300-million initial public offering of subordinate voting shares, valuing the company at C$2.3 billion.

OMERS Life Sciences

Acted for **OMERS Life Sciences** in its US$304.7-million acquisition of 100% of Esperion’s royalty entitlement (subject to a cap) on net sales of bempedoic acid products in Europe by Daiichi Sankyo Europe.

Russel Metals Inc.

Acted for **Russel Metals Inc.** in the establishment of a $600 million credit facility.

International Food Corporation

Acted for **International Food Corporation** (dba Bakery de France) and its shareholders in the sale of 50% of the issued and outstanding shares of International Food Corporation to La Lorraine Bakery Group.

Ironbridge Equity Partners

Acted for funds affiliated with **Ironbridge Equity Partners** in the acquisition and related financing of Gardner Glass Products, Inc., a North Carolina-based company that manufactures and distributes tempered, mirrored, backpainted, and laminated glass products.

Recochem

Acted as counsel to **Recochem** management in the acquisition of H.I.G portfolio company Recochem by funds managed by CapVest.

Copper Mountain Mining Corporation

Acted for **Copper Mountain Mining Corporation** in its US$439-million all-share acquisition by Hudbay Minerals Inc. by way of a court approved plan of arrangement.

Smile CDR Inc.

Acted for **Smile CDR Inc.** (doing business as Smile Digital Health), a leading FHIR® health data fabric (HDF) and exchange solutions provider, in its approximately $30-million Series B funding round led by existing investors.

Fulcrum Capital Partners

Acted for **Fulcrum Capital Partners** in the merger of its portfolio company, Accucam Machining, with EQI Ltd., a portfolio company of Atlas Holdings, to create a leading global supply chain solution for metal products.

External Engagements

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Article
US Corporate AMT: Inbound Investors Beware of Aggregation Rules, co-author
Nov 15, 2023
Tax Management International Journal (Bloomberg Industry Group, Inc.)
Download Article

Article
Disclosure Requirements Aimed at Shell Companies, co-author
Jan 24, 2023
Canadian Tax Journal, Vol. 70, No. 4, (Canadian Tax Foundation)

Insights

PSP Investments Announces Sale of Sunrise Senior Living
Oct 9, 2026

Proposed IRS Regulations Would Narrow Section 892 Exemption for Foreign Governments
Dec 19, 2025

IRS Withdraws Controversial "Funding Rule"
Nov 26, 2025

Proposed REIT Rules Drop Corporate Look-Through
Oct 23, 2025

Tax Changes in the *One Big Beautiful Bill Act*
Jul 18, 2025

Pending Legislation in U.S. Congress May Impact Returns on Inbound Investment
Jun 20, 2025

Select U.S. Tax Developments
Jan 31, 2025

U.S. Supreme Court Upends 40 Years of Judicial Deference to Regulations
Jul 25, 2024

IRS Proposes to Limit Application of Funding Rule on Stock Buyback Excise Tax
Jun 20, 2024

IRS Relaxes Rules for Domestically Controlled REITs
Jun 19, 2024

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

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

Education

Harvard Law School, JD, 2014
Touro College, BS (Summa Cum Laude), 2009

Bar Admissions

New Jersey, 2014
New York, 2015