



Jonathan M. Rhein

Partner

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Expertise

Tax

Bar Admissions

New York, 2015

New Jersey, 2014

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

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.

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

DAVIES

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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.

INSIGHTS

Selected US Tax Developments

Jan. 31, 2025

U.S. Supreme Court Upends 40 Years of Judicial Deference to Regulations

July 25, 2024

IRS Proposes to Limit Application of Funding Rule on Stock Buyback Excise Tax

June 20, 2024

IRS Relaxes Rules for Domestically Controlled REITs

June 19, 2024

US Corporate AMT: Inbound Investors Beware of Aggregation Rules, co-author

Nov. 15, 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-author

Jan. 24, 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