



**Ryan Wolfe**  
Associate

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Toronto

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**Expertise**  
Tax

**Bar Admissions**  
Ontario, 2019

## Ryan is developing a comprehensive tax practice.

He has assisted clients on a range of tax matters, including domestic and cross-border tax planning, mergers and acquisitions, and tax dispute resolution.

### REPRESENTATIVE WORK

#### TPG

Acted as counsel to TPG in its acquisition (and related financings) from Oxford Property Group of a 75% interest in two Class-A industrial business parks in the Greater Toronto Area valued at C\$1.3-billion.

#### Aecon Group Inc.

Acted for Aecon Group Inc. in the C\$150-million strategic preferred equity investment in Aecon Utilities Group Inc. by funds managed by the Power Opportunities strategy of Oaktree Capital Management, L.P.

#### Aecon Group Inc.

Acted for Aecon Group Inc. in the sale of its Aecon Transportation East roadbuilding, aggregates and materials business in Ontario to Green Infrastructure Partners Inc. for C\$235 million in cash.

#### DIF Capital Partners

Acted for DIF Capital Partners, through its DIF Core Infrastructure Fund III (DIF CIF III), in its acquisition of RFNow Inc., an independent enterprise fiber, residential fiber, fixed wireless internet and phone services provider in Manitoba and Saskatchewan.

#### Aptum Technologies

Acted for DigitalBridge, a global digital infrastructure investment firm, in its portfolio company Aptum Technologies' acquisition of CloudOps, a cloud consulting, managed services and software company.

#### 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.

#### Tegus

Acted for Tegus, a leading research platform for investors, with its acquisition of Canlyst, a provider of data and analytics on listed companies.

#### Birch Hill Equity Partners

Acted for Birch Hill Equity Partners in its joint acquisition (and related financing) with Investissement Québec of Québec-based Polycor Inc., the largest quarrier of natural stone in the world.

#### Generac Holdings Inc.

Acted as Canadian counsel to Generac Holdings Inc., a leading energy technology company, in its US\$770-million acquisition of ecobee Inc., a leader in sustainable smart home solutions.

# DAVIES

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## RIV Capital Inc.

Acted for RIV Capital Inc., an acquisition and investment company specializing in cannabis, in connection with the US\$150-million strategic investment by The Hawthorne Collective, a subsidiary of The Scotts Miracle-Gro Company.

## INSIGHTS

Canada's Budget Plan Hides Capital Gains, Stock Options Tax Hike, co-author  
Apr. 28, 2023

Federal Budget 2023 – Major Changes for Business and High Net Worth Individuals  
Mar. 28, 2023

Equitable Remedies in Tax Matters: The Elusive Search for Relief, co-author  
Dec. 06, 2022

Federal Budget 2022: Tax Highlights  
Apr. 08, 2022

Taxation of Formula 1: a Canadian perspective; co-author  
Dec. 04, 2021

Canada Emergency Wage Subsidy: An Updated Guide for Businesses  
Aug. 25, 2020

Canada chapter, co-author  
June 15, 2020

CEWS Update: Review of New Rules and CRA Guidance  
June 09, 2020

The Canada Emergency Wage Subsidy: A Guide for Businesses  
Apr. 23, 2020

GAAR: An Economic Test?, co-author  
Apr. 15, 2020

## EDUCATION

CPA Canada, In-Depth Tax Course, 2022  
Ivey School of Business, University of Western Ontario, JD/HBA, 2018