



## Ian Caines

Partner

### Office

Toronto

### Tel

416.367.7556

### Email

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### Expertise

Tax

### Bar Admissions

Ontario, 2013

New York, 2009

Ian offers innovative tax solutions that enable his clients' growth and success.

Ian advises clients on all areas of domestic and international income tax law, including mergers and acquisitions, reorganizations, financings, investment products and tax disputes. With a background in mathematics and technology, as well as extensive startup experience, Ian brings a rounded approach to the tax implications of new and emerging technologies. He is a trusted adviser to corporate entities, funds and financial institutions, which rely on his technical knowledge and commercial judgment.

Ian is a frequent speaker at national and international industry conferences. Before joining Davies, he practised for nearly a decade at a national law firm and at a prominent New York-based international law firm.

### REPRESENTATIVE WORK

#### **A&W Revenue Royalties Income Fund**

Acting for A&W Revenue Royalties Income Fund in its strategic combination with A&W Food Services of Canada to create a leading publicly-traded quick-service restaurant company.

#### **Pine Valley Packaging Group**

Acted for the sellers in the sale of Pine Valley Packaging Group, a group of companies specializing in the design and manufacture of custom packaging solutions, to a joint venture by Konoike Transport Co., Ltd. and Kanepackage Co., Ltd..

#### **Mastermind Toys**

Acted for Mastermind Toys in its proceedings under the *Companies' Creditors Arrangement Act*, which included liquidating 18 stores and the sale of majority of its locations to Mastermind Toys Inc., a subsidiary of Unity Acquisitions Inc.

#### **Tecpetrol Investments S.L.**

Acted for Tecpetrol Investments S.L. in its successful unsolicited take-over bid to acquire Alpha Lithium Corporation for C\$310 million.

#### **Sprott Inc.**

Acted for Sprott Inc. in the formation of Sprott Private Resource Streaming and Royalty Annex Fund, a US\$310-million annex fund that invests alongside Sprott's first streaming fund, which brings the combined total assets under management of Sprott Resource Streaming and Royalty Corp. in both funds to US\$1.1 billion.

#### **New York Life Insurance Company**

Acted for New York Life Insurance Company in the Canadian private placement of C\$1.05 billion of floating-rate and fixed-rate notes by New York Life Global Funding, a special purpose statutory trust organized under Delaware law, secured by a funding agreements issued by New York Life Insurance Company.

#### **Premium Nickel Resources Limited**

Acted for Premium Nickel Resources Ltd. (PNRL) in its C\$34-million financing

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transactions with Cymbria Corporation and EdgePoint Investment Group Inc. The transactions comprised of an equity offering of units, a three year term loan and options to acquire 0.5% net smelter returns royalties on PNRL's Selebi and Selkirk mines.

### **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.

### **Metropolitan Life Insurance Company**

Acted for Metropolitan Life Insurance Company, CIBC World Markets Inc., TD Securities Inc. BMO Nesbitt Burns Inc. and Scotia Capital Inc. in the Canadian private placement of C\$1 billion of floating-rate and fixed-rate notes by Metropolitan Life Global Funding I, a special purpose statutory trust organized under Delaware law, secured by a funding agreements issued by Metropolitan Life Insurance Company.

### **Cornerstone Capital Resources Inc.**

Acted for Cornerstone Capital Resources Inc. in its merger with SolGold plc under a court-approved plan of arrangement, consolidating ownership of the Cascabel project in northern Ecuador.

## RECOGNITIONS

*Lexpert Special Edition: Finance and M&A*

*The Canadian Legal Lexpert Directory—Corporate Tax*

*The Best Lawyers in Canada—Tax Law*

## INSIGHTS

Canada Finally Enacts the Digital Services Tax (Maybe)  
July 09, 2024

AI in Tax Practice  
June 01, 2024

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

Canada's Digital Services Tax Move Still Sets Nothing in Stone, co-author  
Dec. 14, 2023

Government of Canada Releases Package of Proposed Domestic and International Tax Legislation  
Aug. 16, 2023

Two Percent Tax on Share Buybacks by Public Companies  
Apr. 18, 2023

Highlights of Canada's Latest Legislative Tax Proposals  
Aug. 23, 2022

Federal Budget 2022: Tax Highlights

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Apr. 08, 2022

Ontario Bar Association, International Law Section, "Cross Border Digital Service Tax"; Webcast

Nov. 15, 2021

International Fiscal Association, A Mexico, US and Canada Approach, "Taxation on Blockchain", Webcast

Aug. 25, 2021

## EDUCATION

University of Toronto , JD (Bronze Medallist), 2008

Massachusetts Institute of Technology, PhD, 2005

Dalhousie University, BSc, 2000

## PROFESSIONAL AFFILIATIONS

Canadian Bar Association

Canadian Tax Foundation

International Fiscal Association

Ontario Bar Association