



Christopher K. Fargo

PARTNER, TAX

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Christopher K. Fargo represents clients in connection with the tax aspects of mergers and acquisitions, reorganizations, securities offerings and joint ventures. Mr. Fargo has advised on matters across a broad range of industries, including media and entertainment, consumer products, retail, telecommunications, transportation, energy, healthcare and fintech.

His notable transactions include representing:

- BDT & MSD and its affiliates in connection with multiple investment funds and other transactions, including BDT's combination with MSD Partners; the take-private acquisition of Weber valuing Weber at \$3.7 billion, and reorganization and rollover matters in connection with Weber's combination with Blackstone Products; and the formation of BDT Capital Partners Fund 4, which raised \$14 billion of capital commitments, BDT Capital

Partners Fund 3, which raised \$9.1 billion of capital commitments, and BDT Capital Partners Fund II, which raised \$6.2 billion in capital commitments;

- Costamare in the spin-off of Costamare Bulkers;
- White Mountains Insurance in the pending acquisition, in partnership with Ethos Capital and BCI, of an ownership position in BroadStreet Partners; its \$300 million acquisition of a majority stake in Bamboo; its equity investment in Kudu; its \$388 million acquisition of NSM Insurance Group and the \$1.775 billion sale of NSM to Carlyle; its investment in Elementum Advisors; MediaAlpha's sale of a significant minority stake to Insignia Capital; and its sale of TRANZACT to Clayton Dubilier & Rice;
- DRI Capital in numerous transactions, including the acquisition of a synthetic royalty interest in the worldwide sales of sebetralstat and related equity investment in KalVista Pharmaceuticals, the acquisition from Editas Medicine of payment streams based on the Cas9 gene-editing technology for CASGEVY, the expansion of its royalty interest in Omidria, its acquisition of a royalty interest in Orserdu from Eisai, its acquisition of a second royalty interest in Orserdu from Radius Health, the \$210 million sale of its TZIELD royalty interest to Sanofi, DRI Healthcare Trust's IPO and multiple other financings;
- Legal & General Group in its strategic investment in Taurus Investment Holdings;
- Martin Marietta in its \$2.05 billion acquisition of aggregates operations from Blue Water Industries, the \$2.1 billion sale of its South Texas cement business and related concrete operations to CRH, the proposed \$350 million sale of its California cement plant and related terminals, the sale of certain West Coast cement and concrete operations to CalPortland and its \$2.3 billion acquisition of Lehigh West Region;
- altafiber in the \$670 million sale of CBTS to TowerBrook, its \$2.9 billion acquisition by Macquarie Infrastructure, its \$650 million combination with Hawaiian Telcom, its \$201 million acquisition of OnX Enterprise Solutions and the \$361 million carve-out IPO of CyrusOne as a REIT;
- Star Bulk in its \$2.1 billion combination with Eagle Bulk Shipping;
- OUTFRONT Media in the C\$410 million divestiture of its Canadian business to Bell Media;
- Forward Air in its combination with Omni Logistics, creating a \$3.7 billion company;
- Route Mobile and its founding shareholders in the ₹59.22 billion sale of a majority stake in Route Mobile to Proximus Group;
- AngloGold Ashanti in its corporate restructuring and change to domicile and primary listing location;
- Newcrest in its A\$28.8 billion acquisition by Newmont;

- GasLog Ltd. in its acquisition of GasLog Partners and its take-private transaction with BlackRock's Global Energy & Power Infrastructure Fund;
- IsoPlexis in its acquisition by Berkeley Lights;
- Brookfield Renewable in its strategic partnership with Cameco to acquire Westinghouse for \$8 billion;
- CyrusOne in its \$15 billion acquisition by KKR and Global Infrastructure Partners;
- Eurazeo in its acquisition of Scaled Agile;
- New Senior in its \$2.3 billion acquisition by Ventas;
- CommScope in its \$1 billion investment from The Carlyle Group as part of CommScope's \$7.4 billion acquisition of ARRIS;
- Hibu Group in the sale of its U.S. business to H.I.G. Capital;
- AerCap in its \$30 billion acquisition of GE Capital Aviation Services and its \$28 billion acquisition of International Lease Finance Corporation from American International Group;
- INEOS in its \$404 million acquisition of a 50% membership interest in Gemini HDPE from Sasol;
- Peugeot in its \$50 billion merger with Fiat Chrysler to form Stellantis;
- Roivant Sciences in its Strategic Alliance with Sumitomo Dainippon Pharma;
- New Media in its \$1.4 billion acquisition of Gannett;
- Frontier Communications in its \$1.352 billion sale of operations in Idaho, Montana, Oregon and Washington to WaveDivision Capital in partnership with Searchlight Capital Partners;
- Buckeye Partners in its \$10.3 billion acquisition by IFM and the sale of its 50% interest in VTTI to Vitol and IFM;
- Brunswick in the sale of its Fitness business to KPS Capital Partners and its \$910 million acquisition of Power Products' Global Marine & Mobile business;
- Parker Hannifin in its \$3.675 billion acquisition of LORD;
- Aerion in its partnership with Boeing to bring Aerion's next-generation supersonic business jet to market;
- Brightline in its acquisition of XpressWest;

- Fortress Investment Group in Nationstar Mortgage's merger with WMIH, and in the sale by Fortress of its remaining 40.5% equity interest in OneMain Holdings to an investor group led by Apollo Global Management and Värde Partners;
- Florida East Coast Railway in its sale to Grupo México by Fortress Investment Group;
- Anheuser-Busch InBev in its \$123 billion acquisition of SABMiller, the \$12 billion sale of SABMiller's U.S. and global Miller-branded businesses to Molson Coors and an asset swap with Ambev in which AB InBev transferred SABMiller's Panamanian business to Ambev and Ambev transferred its business in Colombia, Peru and Ecuador to AB InBev;
- NCR in its strategic partnership with Blackstone, including an \$820 million equity investment in NCR by Blackstone;
- the underwriters in the \$982 million IPO of Ferrari;
- Precision Castparts in its \$37 billion acquisition by Berkshire Hathaway;
- Delhaize Group in its \$29 billion merger of equals with Royal Ahold; and
- Crown Castle in numerous transactions, including its \$7.1 billion acquisition of Lighttower; its \$1.5 billion acquisition of FiberNet; the \$1.6 billion sale of CCAL, its Australian subsidiary, to a consortium of investors led by Macquarie Infrastructure and Real Assets; its \$1 billion acquisition of Sunesys; and its \$9.1 billion (including purchase options) acquisition of the rights to approximately 9,700 AT&T towers.

Mr. Fargo has been repeatedly recognized for his work in the tax arena by *Chambers USA* and *The Legal 500 US*. In 2017, he was named a "Rising Star" by *Law360*, recognizing him as one of five outstanding tax lawyers in the nation under the age of 40. In addition, Mr. Fargo has been named a "Leading Lawyer" in international tax by *The Legal 500 US* and as one of the "500 Leading Dealmakers in America" by *Lawdragon*. He is a member of the Tax Section of the New York State Bar Association.

Mr. Fargo regularly contributes to thought leadership on important developments in tax law. He has co-authored multiple editions of the U.S. chapter of the *Chambers "Investing in..."* Guide, and his writings have also been published by outlets such as the Harvard Law School Forum on Corporate Governance.

Mr. Fargo was born in Boston, Massachusetts. He received a B.A. *cum laude* from Boston College in 2003 and a J.D. from Columbia Law School in 2006, where he was a Harlan Fiske Stone Scholar.

Mr. Fargo joined Cravath in 2006 and was elected a partner in 2013.

EDUCATION

- J.D., 2006, Columbia Law School
Harlan Fiske Stone; Michael Lynne Scholar
- B.A., 2003, Boston College
Honors Program, cum laude

ADMITTED IN

- New York

RANKINGS

Chambers USA

- Tax - New York (2024, 2023, 2022)

Law360

- Rising Star: Tax (2017)

Lawdragon

- 500 Leading Dealmakers in America (2024-2021)

The Legal 500 US

- International Tax (2024-2016, 2014)
- US Taxes: Non-contentious (2024, 2023, 2021-2014)