



Jeff Oldewening

Partner

Toronto

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t. 416-601-7778

Bar Admission

Ontario 2006

Law School

University of Western Ontario

Practices

Tax

Tax Planning

Mergers & Acquisitions

Industries

Banking & Financial Services

Food, Beverage & Agribusiness

Technology & Communications

A recognized leader in corporate and cross-border tax law, Jeff helps clients navigate complex transactions and reorganizations

Jeff is a Partner in the Firm's National Tax Group in Toronto with a practice focusing on domestic and cross-border mergers & acquisitions and reorganizations. He develops success-driven tax planning structures.

Jeff is an experienced senior tax practitioner, renowned for developing innovative tax planning structures. He has extensive experience guiding clients through complex domestic and cross-border M&A transactions, reorganizations and investments. He is one of the leading tax advisors in Canada in the area of corporate reorganizations and butterfly transactions.

Jeff frequently acts for clients across a range of industry groups. Jeff teaches butterfly transactions at the *Tax Law for Lawyers* course and previously lectured on capital gains stripping at the *In-Depth Tax Course* for CPA Canada. He is a member of the editorial board for the *International Tax Planning* journal, and a contributor to the *Canadian Tax Journal*.

Jeff has advised on the Canadian tax aspects of a variety of deals and reorganizations, including the following notable transactions:

- **UnitedHealth Group**, in connection with its acquisition of Catamaran Corporation for US\$12.8 billion;
- **Burger King Worldwide**, in connection with its acquisition of Tim Hortons Inc. for US\$12.5 billion, the U.S. tax inversion of Burger King under Restaurant Brands International Inc., the related financing, which involved a US\$3 billion preferred equity investment from Berkshire Hathaway Inc., a secured US\$7.25 billion credit facility and a private placement of US\$2.25 billion of second lien secured notes, and an associated tender offer for Tim Hortons' outstanding US\$1.2 billion of debt securities;
- **Lithium Americas Corp.**, as special tax counsel, in connection with its CAD\$4.75 billion "butterfly" spin-off of Lithium Americas (Argentina) Corp., including an equity subscription by General Motors of USD\$970 million;

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- M&A Deal of the Year at the Canadian Law Awards; and
- **Chrysler**, in respect of its bankruptcy and restructuring.

AWARDS & RANKINGS

The Douglas J. Sherbaniuk Distinguished Writing Award in respect of the paper cited as Jeff Oldewening, Rachel A. Gold and Chris Sheridan, "Statutory Ratification" (2016) 64:1 *Canadian Tax Journal* 293-325. The Canadian Tax Foundation confers this honour for the best writing undertaken for the Canadian Tax Foundation every year.

Awards & Rankings

The Legal 500 - Canada

Next Generation Lawyer: Tax

The Canadian Legal Lexpert Directory

Lead Lawyer: Corporate Tax

Recent Experience

- **TD Bank's issuance of Series CBL66, CBL67 and CBL68 covered bonds totalling EUR 5.5B**
March 11, 2024
- **Toronto-Dominion Bank issues Swiss Franc 265M Series CBL64 covered bonds at 1.4825% due January 30, 2029**
January 30, 2024
- **McCarthy Tétrault advised a syndicate of dealers in connection with the issuance of a C\$2B 4.256% cover bonds by the Royal Bank of Canada**

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December 21, 2023

- **Lithium Americas Corp. separates into two independent lithium companies**

October 3, 2023

Recent Insights

- **2023 Canadian Federal Budget Commentary – Tax Measures**

March 29, 2023

- **2021 Canadian Federal Budget Commentary - Tax Initiatives**

April 20, 2021

- **2021 Canadian Federal Budget Commentary - Tax Initiatives**

April 20, 2021

Events

- **Canadian Public Company Spin-Offs Webinar**

April 19, 2023