



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 for multi-nationals and Canada's leading financial institutions. He has extensive experience guiding clients, including a variety of pension plans, 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, for several years, lectured on capital gains stripping and divisive reorganizations 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 transactions:

- **UnitedHealth Group**, in connection with its acquisition of Catamaran Corporation for approximately US\$12.8 billion;
- **Burger King Worldwide**, in connection with its acquisition of Tim Hortons Inc. for approximately 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;
- **Vistra Energy**, in connection with its acquisition of assets from Crius Energy Trust;
- **Baxter International Inc.**, in connection with its spin-off of Baxalta Incorporated;
- **GlaxoSmithKline**, in connection with its joint venture with Pfizer to combine their consumer healthcare businesses; and
- **Chrysler Canada**, in respect of its 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,

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"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

Recent Experience

- **CARDS II Trust issues C\$1.6B credit card receivables-backed notes**
January 25, 2023
- **Rio Tinto acquires Turquoise Hill Resources for US\$3.3B**
December 16, 2022
- **Evergreen Credit Card Trust issues C\$3.5B of Class A, B and C asset-backed notes, Series 2022-CRT2**
December 15, 2022
- **Lithium Americas Corp. announces intent to separate into two independent lithium companies**
November 03, 2022

Recent Insights

- **2021 Canadian Federal Budget Commentary - Tax Initiatives**
April 20, 2021
- **2021 Canadian Federal Budget Commentary - Tax Initiatives**
April 20, 2021