



Tax

Stikeman Elliott is a firm that was founded on tax expertise and the desire to provide pragmatic advice to our clients that is insightful, creative and tailored to protect each client's business interests. This legacy continues to influence how our lawyers approach legal advice, helping clients accomplish their goals in the most tax-efficient manner possible.

Clients benefit from a full suite of services for domestic and international tax advice, tax planning and tax controversy matters on both standalone tax mandates as well as integrated with corporate, investment, real estate, commercial matters. Drawing upon the expertise of each of our team members, Stikeman Elliott provides clients with efficient, expert tax advice that reflects a full consideration of their tax matters. These clients include publicly listed and private entities, Canadian pension funds, foreign sovereign wealth funds, multinational companies, REITs, infrastructure funds, and US and global private equity funds.

Many clients have integrated operations that cross multiple borders, requiring creative solutions in order to achieve their business objectives while optimizing their tax position. Working closely with counsel in other jurisdictions, we create structures that minimize Canadian and foreign taxes and avoid triggering income or withholding taxes elsewhere, through the repatriation of excess cash. We are also frequently called upon to represent clients in discussions and negotiations with tax authorities, with whom we maintain an on-going and productive relationship.

Our Expertise

- Acquisitions and dispositions
- Commodity taxation
- Corporate financings
- Cross-border tax information exchange
- Customs
- Debt and equity financings
- Estate planning
- Inbound and outbound tax structuring
- Income tax
- Insurance taxation
- Reorganizations and restructurings
- Resource taxation
- Transfer pricing
- Trusts
- Voluntary disclosures and compliance settlements

Accolades

- Corporate Law Firm of the Year - *Chambers Canada Awards 2017*
- *Chambers Canada 2019* for Tax
- *Chambers Global 2019* for Tax - Canada
- *The Canadian Legal Lexpert Directory 2019* for Corporate Tax and Litigation: Corporate Tax

- *The Legal 500 Canada 2019* for Tax
- *Lexpert 2019 Guide to the Leading US/Canada Cross-Border Lawyers in Canada* for Tax
- *Tax Directors' Handbook 2018* as a Leading Tax Law Firm
- Loan Deal of the Year - *IFLR Americas Awards 2019*

Recent Work

- AltaGas Ltd. in its C\$8.4B cross-border acquisition of WGL Holdings, Inc., including related financing, consisting of a US\$4.95B bridge facility, a C\$2.1B bought deal public offering of subscription receipts and a concurrent C\$400M private placement of subscription receipts to OMERS.
- Colas Canada Inc., a wholly-owned subsidiary of Colas SA, in its acquisition of Miller McAsphalt Corporation.
- The Jean Coutu Group (PJC) Inc., a Canadian leader in retail pharmacy, in its C\$4.5B combination with Metro Inc. by way of three-cornered amalgamation.
- Centrica plc in the C\$722M acquisition of its Canadian oil and gas exploration and production business by Canlin Energy Corporation, a consortium of two Hong Kong-based companies, MIE Holdings Corp. and Can-China Global Resource Fund, and Geneva-based Mercuria Energy Group.
- Alberta Investment Management Corporation (AIMCo), as Canadian counsel, in its sale of its 50% interest in Autopista Central de Chile, a Santiago-based toll road infrastructure asset, on behalf of certain of AIMCo's clients, to Abertis Infraestructuras S.A. for €948M (approximately C\$1.5B).
- Ontario Teachers' Pension Plan Board in its C\$1B acquisition of Constellation Brands Canada, Inc.
- The partners (other than the founder Mr. Stephen Jarislowsky) in connection with the C\$950M acquisition by Scotiabank of Jarislowsky, Fraser Ltd, one of Canada's leading independent investment firms.
- IPL Plastics, in connection with an Irish Scheme of Arrangement that established a new holding company in Canada and the concurrent initial public offering of common shares.
- Aimbridge Hospitality, as counsel, in its acquisition of O'Neill Hotels & Resorts Whistler Ltd., operator of The Westin Resort & Spa, Whistler, British Columbia.
- Legado Capital in its acquisition of Kivuto Solutions Inc. representing the largest ever Search Fund acquisition in Canada.
- Boralex Inc. in the acquisition of Invenergy Renewables LLC's interests in five Québec wind farms.
- Sirius XM Canada Holdings Inc. in respect of its statutory plan of arrangement whereby all its shares were acquired by a corporation, 2517835 Ontario Inc., owned by Slight Communications Inc., Obelysk Media Inc. and Sirius XM Radio Inc.
- The shareholders of Bento Sushi in the C\$100M sale of Bento to Yo! Sushi.
- Manitoba Telecom Services Inc. in the acquisition of all of its outstanding shares by BCE Inc. by way of a plan of arrangement for approximately C\$3.9B.

- Progressive Waste Solutions Ltd. in its acquisition by Waste Connections, Inc. in a C\$13B all-stock business combination effected by way of a reverse merger.
- Cheung Kong Property Holdings in its C\$2.8B acquisition of Reliance Home Comfort from Alinda Capital Partners.
- Sprott Asset Management in its hostile takeover bids to acquire all of the outstanding units of Central GoldTrust for C\$1B, and Silver Bullion Trust for C\$62M.
- Centerra Gold Inc. in its US\$1.1B acquisition of Thompson Creek Metals Company Inc. and related financing transactions.
- TransCanada Pipelines Limited, as special tax counsel, in connection with the issuance by TransCanada Trust of US\$1.2B of trust notes due 2076.
- An investor group led by J.C. Flowers & Co. LLC and affiliates, and Värde Partners, as Canadian counsel, in their acquisition of CitiFinancial Canada, Inc.