

## Jeffrey T. Sheffield

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### Northwestern University School of Law

*Professor of Practice*            2019 - Present  
*Senior Lecturer*                2013 - 2019

Courses taught:                Consolidated Returns  
    International Tax  
    Tax Aspects of Private Equity Transactions

### Kirkland & Ellis LLP

*Partner*, 1985 - present.  
Former member, Firm (Management) Committee

### Prior Professional Experience

*Lecturer*, University of Chicago Law School, (1990-99) (Business Planning)

*Adjunct Professor*, IIT Chicago-Kent College of Law (1986-89) (Corporate Tax; Corporate Reorganizations; Advanced Income Tax)

*Clerk*, Hon. Benjamin Kaplan, Massachusetts Supreme Judicial Court (1979-80)

*Member*, University of Chicago Federal Income Tax Conference (1989-present), and Conference *Chair* (1998-2000 and 2008-09)

*Consultant*, Federal Income Tax Project: Taxation of Private Business Enterprises (American Law Institute) (1999)

### Education

*Harvard Law School*, Cambridge, Massachusetts (1976-79)

J.D. 1979 (*cum laude*)

Harvard Law Review (1977-79) (Articles Editor 1978-79)

*University of Chicago*, Chicago, Illinois (1972-76)

B.A. 1976, with Honors

Phi Beta Kappa

## **Selected Publications** (author or co-author)

*Whose Earnings and Profits? What Dividend? A Discussion Based on the Dr Pepper – Keurig Transaction*, 73 **The Tax Lawyer** 299 (2020) (included in PLI Corporate Tax Practice series)

**United States International Taxation** (Carolina Academic Press) (4th ed.) (2019)

*Intentionally Disqualified Tax-Free Corporate Transactions*, 93 **Taxes** 85 (2015)

*Spin-offs, Corporate Capital Structure and Disguised Sales*, 91 **Taxes** 119 (2013) (included in PLI Corporate Tax Practice series)

*Corporate Transactions and the Economic Substance Doctrine*, 89 **Taxes** 163 (2011)

*Monetization Strategies in Corporate Spin-Offs*, 81 **Taxes** 287 (2003)

*Selected Developments in Corporate Taxation*, 50 **Major Tax Planning** § 2 (1998)

*Reconciling Spin-Offs with General Utilities Repeal*, 74 **Taxes** 941 (1996)

**Organizing The Corporate Venture** (Little Brown & Co.) (1995) (updated annually as part of PLI Corporate Tax Practice series)

*The Many Guises of Preferred Stock*, 70 **Taxes** 793 (1992)

*Selected Tax Issues in Partnership Debt Restructurings*, 68 **Taxes** 861 (1990)

*An Abecedarium on Alphabet Stock*, 66 **Taxes** 954 (1988)

*The Dealer-Investor Problem*, in **Federal Tax Aspects of Real Estate Transactions** (R. Lang, ed.) (1987 + Supps.)

*Holding Company Formations*, 64 **Taxes** 846 (1986)

*Debt Issued for Traded and Nontraded Property*, 62 **Taxes** 1022 (1984)

*Tax Aspects of Financing New Business Start-Ups and Second Round Financings Through R&D Partnerships*, 42 **N.Y.U. Fed. Tax Inst.** ¶9 (1984)

*Section 269 Revisited*, 61 **Taxes** 881 (1983)

*Bailouts and Bootstraps After TEFRA: Section 304, Section 306 and The Consolidated Return Rules*, 61 **Taxes** 555 (1983)

*Beyond Orrisch: An Alternative View of Substantial Economic Effect Under Section 704(b)(2) Where Nonrecourse Debt is Involved*, 60 **Taxes** 937 (1982)

## **Selected Speeches and Outlines**

Northwestern University School of Law (Advanced Topics in Taxation); University of Chicago Federal Income Tax Conference; PLI (Tax Strategies for Corporate Acquisitions, etc.); IIT-Chicago Kent College of Law Federal Tax Institute; USC Tax Institute; Tax Executives Institute; Law & Business Seminars; Chicago Federal Tax Forum; and Chicago Tax Club

## **Professional Acknowledgements**

Chambers Global and USA, *The World's Leading Lawyers for Business*

International Tax Review, *Guide to the World's Leading Tax Advisors and North America's Top Tax Advisors*

Best Lawyers in America, *Best Lawyer of the Year* (Tax Law, Chicago) (2012); *Best of the Best* (Top 30 Tax Lawyers in the US)

Finance Monthly & CorporateINTL, *Tax Planning Lawyer of the Year – Illinois*

Who's Who Legal, *The International Who's Who of Corporate Tax Lawyers*

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