

Associate, Chicago

Tax



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Education

J.D., University of Chicago Law School, 2014

M.A., University of Chicago, 2011

B.A., Wheaton College, 2008

Bar Admissions

Illinois

Publications

"Debt-Equity Controversy Echoes Entity Classification Debate," *Tax Notes*, July 18, 2016

"Modern REITs and the Corporate Tax: Thoughts on the Scope of the Corporate Tax and Rationalizing Our System of Taxing Collective Investment Vehicles," *CCH's Taxes - The Tax Magazine*, March 1, 2016

Kevin Jones advises clients on a wide range of federal income tax planning matters. These matters have involved mergers, acquisitions, dispositions, reorganizations, REIT transactions, partnership transactions, private and public securities offerings, financings, private equity transactions, and foreign investments by sovereign wealth funds and other foreign investors in the U.S., including under the Foreign Investment in Real Property Tax Act.

Mr. Jones has represented, among others:

- Brookfield Asset Management in its \$6.8 billion acquisition of Forest City Realty Trust;
- SL Green Realty Corp. in connection with its formation of a \$1.8 billion joint venture with the National Pension Service of the Republic of Korea and Hines Interests Limited Partnership for the development of One Vanderbilt Avenue in New York; its sale of a 43 percent interest in 1515 Broadway in New York to affiliates of Allianz Real Estate for \$416 million; and its \$223 million sale of its 48.9 percent interest in 3 Columbus Circle in New York to The Moinian Group;
- The Lone Star Funds in its \$7.6 billion structured acquisition of Home Properties, Inc. and the related spin-off of \$908 million of multi-family residential properties to a private DownREIT partnership sponsored by UDR, Inc.; its \$1.8 billion sale of a 25-property portfolio to Harbor Group International; and its \$600 million sale of a 28-property portfolio to Carroll Organization and PGIM Real Estate;
- a sovereign wealth fund in its formation of a joint venture with Paramount Group and the related acquisition of a 95 percent interest in a New York City office tower valued at \$1.04 billion; and its formation of a joint venture and the related acquisition of interests in office assets in the Washington, D.C. metro area, totaling more than \$1.05 billion in aggregate asset value;
- Potlatch Corporation in its all-stock merger with Deltic Timber Corporation;
- Ball Corporation in its \$3.1 billion antitrust-related disposition of certain assets to Ardagh Group following its acquisition of Rexam PLC; and the refinancing of its \$1.5 billion revolving, \$1.4 billion secured term and €1.1 billion secured term loan facilities;
- American Capital, Ltd. in its sale to Ares Capital Corporation, excluding American Capital Mortgage Management, LLC, for \$3.43 billion and its sale of American Capital Mortgage Management to American Capital Agency Corp. for \$562 million;
- Silverstein Properties in connection with the structuring and development of various real property assets, including the formation of a joint venture to acquire the former ABC campus in New York City for \$1.15 billion; and
- AustralianSuper in its \$900 million acquisition of an interest in the Ala Moana Center in Honolulu from General Growth Properties.