

Geoffrey M. Davis

Partner

gdavis@jenner.com

Office

Chicago

Phone

+1 312 923 8302

Areas of Focus

Transitions in Energy and

Climate Solutions

Bankruptcy and

Restructuring

Cannabis

Energy

Hedge, Investment, and

Private Equity Funds



Overview

Geoff Davis has an extensive federal tax practice that includes acquisition and divestiture transactions, restructuring and financing transactions, and fund formation and related investments. Geoff also routinely handles a wide spectrum of tax controversy matters.

Geoff's background has provided him with an invaluable foundation for his law practice in tax. He began his career as a CPA and international tax practitioner with Price Waterhouse and later clerked in federal district court. Geoff then successfully practiced as a commercial litigator for several years before re-focusing on tax and transactional work. He therefore recognizes what businesses need financially to be successful (and how legal issues may affect their bottom line) and understands the inner workings of the Court (and what his clients will need to achieve their goals when tax issues arise).

Geoff is Co-Chair of the firm's Tax Practice, and an integral member of many of the firm's practice specialty groups, including Corporate, Mergers and Acquisitions, and Bankruptcy and Restructuring. He serves clients in a variety of industry specialty areas, including aerospace, energy, financial services, food and beverage, government contracts and grants, hospitality, manufacturing companies, pharmaceutical, real estate, and cannabis companies. In addition, Geoff serves on the firm's Finance, Pro Bono, and Opinion Committees and has taught tax courses as an adjunct professor at Chicago-Kent College of Law and at John Marshall Law School.



My breadth of tax law expertise coupled with my background as both a CPA and litigator, and my collaborative approach to trying cases, serve as the winning ticket in complex tax matters and allow me to leverage favorable structures and strategically resolve business issues.”

Areas of Focus

- Transitions in Energy and Climate Solutions
- Bankruptcy and Restructuring
- Cannabis
- Energy
- Hedge, Investment, and Private Equity Funds
- Japan Practice
- Mergers and Acquisitions
- Real Estate and Hospitality
- Real Estate Transactions
- Tax
- Corporate
- Data Centers

Representative Matters

- Counseled confidential client on long-term carbon capture and storage contract and related power and ancillary agreements involving substantial long-term manufacturing and product emissions realignment.
- Counseled gold mining company, Nomad Royalty Company Ltd., in connection with its acquisition by Sandstorm Gold Ltd. This was a \$590 million cross-border transaction designed to create the highest growth, most liquid mid-tier gold royalty company.
- Represent Lonza, a Swiss firm operating in the pharmaceutical, biotech and nutrition markets, in the sale of its sale of its Specialty Ingredients business and operations to Bain Capital and Cinven for an enterprise value of CHF 4.2 billion.
- Secured winning ruling in precedent-setting felony tax obstruction case in front of the US Supreme Court. Geoff provided tax controversy counsel for defendant, Carlo Marinello, and partnered with two Jenner and Block partners to represent him in front of the high court. The justices ruled 7-2 in favor of Marinello. The ruling overturned Marinello’s tax obstruction conviction and the precedent set by six lower circuit courts of appeal. The

opinion also was cited repeatedly in the House of Representatives' Evidentiary Record on President Donald J. Trump's first impeachment.

- Represented several public Cannabis companies in connection with cross-border reverse take-over go-public transactions, capital markets transactions and acquisitions.

Credentials

Admissions

- Illinois, 1992

Education

- Boston University School of Law, JD, *cum laude*, 1992
- University of Wisconsin-Madison, BBA, with honors, 1986

Court Admissions

- US Supreme Court, 2018
- US Court of Appeals, Seventh Circuit, 1996
- US District Court, Northern District of Illinois, 1992
- US Tax Court, 1999

Clerkships

- Hon. William T. Hart, US District Court, Northern District of Illinois, 1992-1994

Service / Recognition

Awards

- *Chambers USA*, Tax (Illinois), 2012-2024
- *Legal 500*, Tax (Domestic Tax: Central), 2011, 2013; Tax - US taxes - Non-contentious - 2017, 2020, 2021; Cannabis, 2021
- *Law360*, MVP, Tax, 2018
- *The Best Lawyers in America*, Tax Law, 2026

Service to the Bar

- American Bar Association, Fellow
- Chicago Bar Association, Chair, Federal Tax Committee, 2008-2009; Past Chair, Corporate Tax Sub-committee; Past Vice-Chair-Elect, Partnership Taxation Sub-Committee