

Tax

Comprehensive knowledge of how the complex and continually evolving nature of tax law plays a crucial role in corporate transactions, restructurings and other commercial matters. Weil's Tax lawyers deliver value to clients by providing creative, strategic solutions that make sound business sense and are pragmatic commercially.

Global Practice

Weil's Tax practice, mirroring the Firm's profile, is global in scope. Our more than 50 lawyers located throughout our U.S. and European offices regularly work with multinational clients and private equity sponsors to navigate the often complex tax aspects of mergers and acquisitions that cross national borders. Our Tax lawyers in the United States advise both U.S. companies investing abroad and non-U.S. investors in the United States. Similarly, our Tax lawyers in London, Paris, Munich and Frankfurt advise local clients on the national tax impacts of their international transactions. We pride ourselves on working together as one integrated team.

High-Profile, Complex Cross-Border Transactions

Weil's global Tax Group advises on some of the biggest, most complex and highest profile domestic and cross-border transactions. We not only understand the nature of our clients' transactions, but also understand their businesses, and are a critical part of the team that works to accomplish each client's business goals. Our clients rely on us to deliver innovative, comprehensive, and tax-efficient solutions on nearly every type of domestic and cross-border transaction presenting significant tax issues, including:

- Complex M&A;
- Private Equity and Private Funds matters;
- Restructurings and Recapitalizations;
- Securitizations;
- Real Estate and Real Estate Investment Trusts (REITs); and
- Capital Markets and other financing matters.

Our global tax practice is largely a transactional and financing practice. We provide sophisticated, deal-specific tax advice that allows our clients to accomplish their commercial objectives on a tax-efficient basis. Our extensive deal experience and deep bench allows us to provide real-time advice that takes into account current tax developments. We regularly counsel clients across multiple jurisdictions in connection with acquisitions and dispositions of global business operations, spin-offs, joint ventures, financings, and offerings of both debt and equity.

Private Funds – From Formation through Exit

Weil's Tax Group is a critical partner to Weil's Private Funds Group. We advise on all tax aspects related to fund formation, fundraising and investment into domestic and international private funds, from

large multi-billion U.S. Dollar/Euro funds to smaller growth capital funds for emerging managers. Weil's Tax Group has a diverse range of experience in all major industry segments— buyout funds, growth equity funds, middle market funds, infrastructure funds, real estate funds, debt funds, fund-of-funds, secondary funds, special situations funds, hedge funds and other industry-specific funds, and in the entire fund life cycle, from formation to exit. We take full advantage of our global presence in designing investment vehicles to meet diverse needs. On the fundraising side, we are able to offer, and negotiate, a wide range of structures tailored to the needs of the important constituencies – U.S. taxable, U.S. tax-exempt and non-U.S. investors and sponsors. For sponsors, we also design general partner and management company arrangements to maximize the after-tax returns for the lead individuals and the investment professionals who support them. We work with large, middle market and small funds. In all our projects, we strive through our extensive experience and up-to-date knowledge to create structures that are acceptable to investors and that enable our clients and transactional tax lawyers to efficiently enter and exit investments, both onshore and offshore.

Weil's Tax Group regularly counsels large investors in funds. Our tax teams in the United States and United Kingdom, in particular, have extensive experience counseling institutional and sovereign investors on the particular tax consequences of investing in private equity funds, REITs and co-investment opportunities globally.

Tax Aspects of Bankruptcy and Restructuring

Weil's Tax Group also has extensive experience in the bankruptcy tax field, advising debtors, creditors (including creditors committees, banks, financial institutions and insurance companies), equity holders (including fund sponsors), investors, buyers and sellers alike.

Our tax lawyers assist in all phases of a restructuring (whether in or outside of bankruptcy), including:

- Advising in connection with modifications of debt, and debt/equity exchanges;
- Structuring tax efficient plans of reorganization and liquidation, including evaluating and designing structures to retain valuable corporate tax attributes and to protect debt holders and equity holders from phantom income;
- Working to align or otherwise take into consideration the needs of all parties-in-interest in tax matters;
- Pre-bankruptcy planning to manage sales and employment tax liabilities to protect management and controlling persons from personal liability for such taxes;
- Representing debtors before the Internal Revenue Service (IRS) and other tax authorities in resolving disputes over prepetition and administrative tax liabilities; and
- Dealing with the IRS and other tax authorities in obtaining rulings and closing agreements where appropriate.

Related:

- › [Mergers & Acquisitions](#)
- › [Restructuring](#)
- › [Private Equity](#)
- › [Private Funds](#)
- › [Executive Compensation & Benefits](#)

Key Contacts



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Recent Announcements

- › **Weil Advised OMERS Private Equity and its Portfolio Company Paradigm in Refinancing**
Deal Brief — May 07, 2024
- › **Weil Advises Pacific Avenue Capital Partners in its Acquisition of Sogefi's Filtration Business**
Deal Brief — May 07, 2024
- › **Weil Advises CFGI on Agreement to Acquire PAS Financial Advisory AG**
Deal Brief — May 06, 2024
- › **Weil Advises Cedar Fair on Financing Related to the Merger with Six Flags and Redemption of its 2025 Senior Secured Notes**
Deal Brief — May 03, 2024
- › **Weil Advises Underwriters in UL Solutions' \$1.1 Billion IPO**
Deal Brief — May 02, 2024

Named Tax "Practice Group of the Year"

— *Law360* 2021

Named "Dallas & Houston Tax Firm of the Year"

— *International Tax Review* 2023

Named "U.S.: Washington, D.C. Tax Firm of the Year"

— *ITR Americas Tax Awards* 2021 and 2022

Devon Bodoh Named "Tax Law Trailblazer"

— *National Law Journal* 2023

Ranked Tier 1 for U.S. Taxes: Non-Contentious

— *Legal 500 US 2023*

Ranked Tier 1 for Tax in New York and Washington D.C.

— *International Tax Review's World Tax 2023*

Named a “Leading” Firm for Tax, Global-wide, in the U.K. and in the U.S.

— *Chambers Global 2023*

Named a “Leading” Firm for Tax in France

— *Chambers Europe 2022*

Named a “Leading” Firm for Tax in New York, District of Columbia and the U.S.

— *Chambers USA 2023*

Named a “Leading” Firm for International Tax

— *Legal 500 US 2022*

Named a “Leading” Firm for Tax in London

— *Chambers UK 2022*

Winner of “Tax: Transactional” New York Award

— *Chambers USA 2019*

Twelve partners named among the leading “Bankruptcy Tax Specialists in the Nation’s Major Law Firms”

— *Turnarounds & Workouts 2022*

Awards and Recognition

- › **Weil Named Tax “Practice Group of the Year”**
Award Brief — Law360 2021
- › **Weil Named “Dallas & Houston Tax Firm of the Year”**
Award Brief — International Tax Review 2023
- › **Weil Named “U.S.: Washington, D.C. Tax Firm of the Year”**
Award Brief — ITR Americas Tax Awards 2021 and 2022
- › **Weil Ranked Tier 1 for Tax in New York and Washington D.C.**
Award Brief — ITR World Tax 2024
- › **Weil Named a “Leading” Firm for Tax in Texas and United Kingdom**
Award Brief — ITR World Tax 2024
- › **Weil Named a “Leading” Firm for Tax in London**
Award Brief — Chambers UK 2022
- › **Weil Ranked Tier 1 for U.S. Taxes: Non-Contentious**
Award Brief — Legal 500 US 2023
- › **Weil Named a “Leading” Firm for Tax, Global-wide, in the U.K. and in the U.S.**

- › **Weil Named a “Leading” Firm for Tax in France**
Award Brief — Chambers Europe 2022
- › **Weil Named a “Leading” Firm for International Tax**
Award Brief — Legal 500 US 2022

Speaking Engagements

- › **PLI's Practical Guide to the Consolidated Tax Return Regulations 2023**
Speaker(s): [Joseph M. Pari](#)
March 1, 2023 — New York, NY — Co-Chair of Weil's Tax Department Joseph Pari spoke on a panel titled “Transactions Affecting the Continuation of a Consolidated Group” as part of PLI's Practical Guide to the Consolidated Tax Return Regulations 2023.
- › **PLI's International Tax Issues 2023**
Speaker(s): [Devon Bodoh](#)
January 31, 2023 — New York, NY — Weil International Tax Head Devon Bodoh spoke on a panel titled “Cross-Border M&A Planning and Developments” as part of PLI's International Tax Issues 2023.
- › **12th Annual IBA Finance & Capital Markets Tax Conference**
Speaker(s): [Devon Bodoh](#)
January 16, 2023 — London — Weil International Tax Head Devon Bodoh is speaking on a panel titled “Pillar 2 implementation: Latest updates and hot topics” as part of the 12th Annual IBA Finance & Capital Markets Tax Conference.

Latest Thinking

- › **Inflation Reduction Act: Treasury and IRS Release Final Regulations on Credit Transferability**
Alert — Energy — By [Steven Lorch](#), [Jonathan J. Macke](#), [Griffin Haden Baker](#) and [Nathan Bunch](#) — PDF — May 20, 2024
- › **Corporate Tax 2024 — USA: Law & Practice**
Publication — Chambers Global Practice Guides — By [Devon Bodoh](#), [Greg Featherman](#), [Joseph M. Pari](#), [Alex P. Dobyan](#) and [Grant Solomon](#) — PDF — April 15, 2024
- › **Inflation Reduction Act: IRS Expands Eligibility for Energy Community Bonus Credit**
Alert — Energy — By [Steven Lorch](#), [Jonathan J. Macke](#), [Nathan Bunch](#) and [Natalia Pierotti](#) — PDF — March 28, 2024
- › **Proposed Guidance on Investment Tax Credits for Clean Hydrogen Production Facilities**
Alert — By [Jonathan J. Macke](#), [Omar Samji](#), [Irina Tsveklava](#), [Andrew Lawson](#) and [Humzah Qamar Yazdani](#) — PDF — January 18, 2024
- › **Treasury and IRS release proposed guidance on production of clean hydrogen**
Alert — By [Jonathan J. Macke](#), [Omar Samji](#), [Irina Tsveklava](#), [Andrew Lawson](#) and [Humzah Qamar Yazdani](#) — PDF — December 29, 2023
- › **Chambers Expert Focus Weil Tax Insight Series: Tax Implications of New Rules Under the Advisers Act**
Blog Post — Tax Blog — By [Robert Frastai](#) and [Andrew Morris](#) — October 17, 2023
- › **Chambers Expert Focus Weil Tax Insight Series: U.S. Tax Legislative Update**
Blog Post — Tax Blog — By [Devon Bodoh](#) and [Joseph M. Pari](#) — October 17, 2023

Firm News & Announcements

- › **Weil Advised OMERS Private Equity and its Portfolio Company Paradigm in Refinancing**

Deal Brief — May 07, 2024

› **Weil Advises Pacific Avenue Capital Partners in its Acquisition of Sogefi's Filtration Business**

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› **Weil Advises Cedar Fair on Financing Related to the Merger with Six Flags and Redemption of its 2025 Senior Secured Notes**

Deal Brief — May 03, 2024

› **Weil Advises Underwriters in UL Solutions' \$1.1 Billion IPO**

Deal Brief — May 02, 2024

› **Weil Advises on Financing of the Merger Between n2y and Texthelp**

Deal Brief — April 30, 2024

› **Weil Advises on €450M High Yield Offering and Revolving Credit Facility Upsize by IMA**

Deal Brief — April 29, 2024

› **Weil Advises PAI Partners on its Acquisition of Audiotonix**

Deal Brief — April 23, 2024

› **Weil Advises Strattam Capital in the Closing of its Third Flagship Fund**

Deal Brief — April 22, 2024

› **Weil Advises Goldman Sachs on Sale of Marcus Invest's Digital Investing Accounts to Betterment**

Deal Brief — April 22, 2024

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