

# Snell & Wilmer

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## **Marc L. Schultz**

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### **Main Bio**

Marc Schultz's practice is concentrated in federal, local and state taxation matters, including complex transactions involving corporations, limited liability companies, limited partnerships, tax exempt entities, and real property. Marc regularly engages in advising clients with respect to mergers and acquisitions, joint ventures, formation of private investment funds, tax credit financing, and energy transactions. Marc currently chairs Snell & Wilmer's Tax Credit Finance Group and Renewable Energy Group, and founded and co-chairs the firm's Opportunity Zones and Funds Industry Group.

Marc has represented investors, developers, and syndicators with respect to Low-Income Housing Tax Credit transactions, and has represented numerous parties with respect to transactions involving New Markets Tax Credits, Historic Tax Credits, and Renewable Energy. As part of his renewable energy practice, Marc regularly drafts Power Purchase Agreements.

Marc is a regular speaker and panelist on the subject of tax credit finance and the Opportunity Zone incentive, and has written numerous articles and has been quoted in numerous publications with respect to these subject areas.

Marc is currently representing investors, fund sponsors, and developers with respect to the Opportunity Zone incentive. Marc was involved in the advising and drafting of a number of comment letters that were submitted to the U.S. Department of the Treasury and the Internal Revenue Service regarding the Opportunity Zone proposed regulations.

Marc served as an adjunct professor, teaching taxation of business entities in the Graduate Program of Accountancy, at the University of Illinois-Chicago. Marc also served on the Board of Directors for the Arizona Housing Finance Authority, as an appointment by Arizona Governor Doug Ducey.

### **Representative Transactions**

#### ***Tax Credit Financing and Renewable Energy Transactions***

- Lead counsel to solar developer in its development and financing of 20 MWs of distributed generation solar projects in the Midwest
- Lead counsel to regional bank in its tax equity investment (using sale-leaseback model) in numerous residential solar leases and equipment
- Represented lender in making nonrecourse loans to solar developer engaged in a tax equity financing using the inverted lease model for the development of 5 MWs of distributed solar projects

- Represented lender in connection with \$20 million nonrecourse loan to developer to finance 10 MWs solar facilities located in Arizona, California and Colorado
- Lead counsel in advising contractor/developer in negotiation of EPC contract for the construction and development of large distributed generation solar facility in the Midwest
- Lead tax counsel to Low-Income Housing Tax Credit developer with respect to a transaction involving grant proceeds from Section 1602 of the ARRA and the monetization of the income tax losses to an investor
- Lead tax counsel to prominent national hotel developer using New Markets Tax Credits and Historic Tax Credits financing to develop and operate a hotel in a historic building located in downtown Phoenix
- Lead tax counsel to national real estate developer using New Markets Tax Credit financing to develop the commercial portion of a vertical mixed-use structure located in downtown San Diego whereby the residential units involved financing from Low-Income Housing Tax Credits
- Lead tax counsel to solar project developer in its construction of utility-scale solar plant using New Markets Tax Credit financing and the monetization of Investment Tax Credits
- Represented developer in the use of Low-Income Housing Tax Credits and Historic Tax Credits to rehabilitate large historic building to provide housing to veterans
- Lead tax counsel for a nonprofit federal organ procurement organization (certified by Centers for Medicare and Medicaid Services) using state New Markets Tax Credit financing for working capital and business expansion purposes
- Lead counsel in representing leverage lender in federal New Markets Tax Credit transaction with orthopedic hospital
- Lead tax counsel for a nonprofit school using both federal and state New Markets Tax Credit financing to construct and operate a nonprofit high school in Nevada
- Lead tax counsel for developer using New Markets Tax Credit financing to construct and operate a mixed-use building located in downtown Tucson
- Lead tax counsel for developer of charter schools in using New Markets Tax Credit financing to construct and develop a facility for a charter school in Arizona
- Tax counsel for a large national tax credit syndicator with respect to the syndication of Low-Income Housing Tax Credits and Historic Tax Credits
- Tax counsel for CDE that requested private letter ruling from the Internal Revenue Service for special allocation by a partnership of the New Markets Tax Credit (and cited in the Novogradac New Markets Tax Credit Handbook)

### ***Significant Representations***

- Lead tax counsel for the formation of a joint venture involving a developer and large pension fund for the development of a \$270 million high-rise building in the City of Chicago
- Lead tax counsel to multi-national publicly traded corporation with respect to the negotiation of the largest single sponsorship payment with a professional athlete
- Lead tax counsel to a large residential solar integrator in obtaining groundbreaking IRS private letter ruling regarding the tax treatment of the sale of renewable energy credits (RECs)
- Lead tax counsel in the structuring of a joint venture among three national shopping center developers to construct and operate a multi-use shopping and entertainment facility in the State of Wisconsin

- Tax counsel to a real estate investment company with respect to its \$300 million acquisition of a large real estate investment trust holding two large resort properties
- Structured and was the lead tax counsel for a \$250 million joint venture between three private universities located within the City of Chicago to construct and operate an urban school dormitory that was partially financed with tax-exempt bonds
- Co-lead tax representation of the sellers of an Illinois-based manufacturer to a private equity group for \$800 million
- Tax counsel to New York investment bank with respect to the tax-free spin-off of a publicly traded corporation
- Lead tax counsel in structuring and negotiating joint venture between large publicly traded corporation and large Tribal casino operator to construct and operate large-scale casinos within the United States
- Tax counsel to major Division I college athletic conference
- Lead counsel for the formation of numerous pooled investment funds with an aggregate targeted raise in excess of \$850 million involving numerous assets classes including real estate, privately held companies, and marketable securities
- Lead tax counsel to Illinois company with respect to its tax-free acquisition by a large publicly traded home improvement retailer for \$130 million
- Lead tax counsel for the divestiture of a large California real estate portfolio of numerous class A high-rise residential and office buildings involving complex forward and reverse like-kind exchanges and the acquisition of a large class A high-rise office building located within the State of California as replacement property (at a record acquisition price per square foot) using numerous tenancy-in-common arrangements
- Lead tax counsel to manufacturer of wind turbines for the creation of a financial model to expand project development opportunities
- Lead tax counsel for the formation of a joint venture involving a developer and investor for the conversion of a 65-story apartment building development into condominiums in the City of Chicago
- Represented and negotiated settlements with the Internal Revenue Service for numerous investors of Lloyds of London with respect to multimillion-dollar disputes involving syndication losses and the passive loss rules
- Obtained tax exemption ruling for a national labor union of resident physicians using a limited liability company as the tax-exempt entity
- Developed structure for the sale and acquisition of private corporate jets in the State of Illinois to reduce taxpayers' sales tax liabilities
- Provided tax advice to national real estate investment trust with respect to REIT compliance
- Advised large tenancy in common syndicator with respect to like-kind exchange and tenancy in common issues

## Education

- New York University School of Law (LL.M., Taxation)
- Chicago-Kent College of Law (J.D., with highest honors)
  - Order of the Coif

- Dean's List
  - Academic Scholarships 2nd and 3rd years
  - American Jurisprudence Award: Bankruptcy
  - Academic Achievement Award: Legal Drafting
- Michigan State University (B.A., Business, with honors)

## Professional Memberships & Activities

- East Valley Partnership, Board Member
  - Economic Development Committee, Co-Chair
- Taskforce Member, Financing Solutions for Homelessness
  - Arizona Department of Housing
- Arizona Housing Finance Authority, Past Member of the Board of Directors
  - Appointed by the Governor of Arizona
- American Bar Association
  - Section on Taxation
  - Affordable Housing & Community Development

## Representative Presentations & Publications

- "IRA Technical Tax Issues," Co-Presenter, Novogradac Spring Renewable Energy and Environmental Tax Credits Conference (May 18, 2023)
- "[All Eyes on Werfel as New IRS Commissioner Settles Into Role](#)," Quoted, Thomson Reuters (March 29, 2023)
- "Inflation Reduction Act," Speaker, Leadership Teams for Large Oil Company, Salt Lake City (December 2022)
- "Using Renewable Energy Tax Credits with Opportunity Zones," Featured Speaker, National Podcast (November 2022)
- "Renewal Energy Tax Credit Provisions in the Inflation Reduction Act of 2022," Panelist, National Development Council Virtual Academy - Washington Update (October 5, 2022)
- "2022 Opportunity Zone Expo National Conference," Panelist, Opportunity Zone Expo, Phoenix, Arizona (October 3, 2022).
- "Renewable Energy and the Inflation Reduction Act of 2022," Presenter, Snell & Wilmer Webinar (September 9, 2022)
- "Opportunity Zones", Presenter, State of Tennessee Opportunity Zone Conference, Nashville and Memphis, Tennessee (May 10 & 12, 2022)
- "Advanced OZ Tax Issues," Speaker, Novogradac Spring Opportunity Zone Conference, Long Beach, California (April 21, 2022)
- "[Crystallization of the Promoted Interest: A Strategy for Opportunity Zone Sponsors](#)," Author, Opportunity Zone Magazine (February 7, 2022)
- "gBETA Opportunity Zone Capital Conference," Speaker, Hosted by the Colorado Office of Economic Development and International Trade (January 7, 2022)
- "[Opportunity Zone Investing, Part Two](#)," Panelist, Bisnow National Webinar (December 7, 2021)

- "[America's Top Project 2021](#)," Moderator, AZ Opportunity Zone (December 2, 2021)
- "[Carried-Interest Plan in House Seen Harsher Than First Thought](#)," Quoted, Bloomberg Law (September 20, 2021)
- "Update on Qualified Opportunity Zone Rules," Presenter, Snell & Wilmer Virtual CLE Series (June 8, 2021)
- "[IRS Regs Let Opportunity Zone Businesses Pivot Due To Virus](#)," Quoted Law360 (May 19, 2021)
- "[Intro Opportunity Zones Finance WebCourse](#)," Speaker, Council of Development Finance Agencies (CDFA) (April 28, 2021)
- "Novogradac 2021 Spring Opportunity Zones Virtual Conference," Presenter (April 22, 2021)
- "[Opportunity Zone Incentive - Critical Dates in 2021](#)," Co-Author, Snell & Wilmer Legal Alert (March 16, 2021)
- "[The Opportunity Zone Incentive: Poised to Lead in the Upcoming Economic Recovery](#)," Author, Opportunity Zone Magazine (February, 24, 2021)
- "Opportunity Appalachia Investor Virtual Conference," Speaker, Council of Development Finance Agencies (CDFA) (February 23, 2021)
- "Opportunity Zones and Native American Transactions," Speaker, State of Colorado Virtual Event (December 28, 2020)
- "[Opportunity Zone Order May Not Attract Private Investment](#)," Quoted, Law360 (September 29, 2020)
- "[Opportunity Zones Raise \\$75B, White House Report Says](#)," Quoted, Law360 (August 24, 2020)
- "[Notice 2020-39: IRS and Treasury Ease Opportunity Zone Incentive Requirements in Response to the COVID-19 Crisis](#)," Co-Author, Snell & Wilmer Legal Alert (June 24, 2020)
- "[Treasury Provides Relief in Notice 2020-23 for Opportunity Zone Incentive Investors - More Changes May Be Needed for the Opportunity Zone Incentive to Assist in the COVID-19 Crisis Recovery Efforts](#)," Author, Snell & Wilmer Legal Alert (April 17, 2020)
- "[COVID-19 Pandemic May Imperil Opportunity Zone Projects](#)," Quoted, Law360 (April 9, 2020)
- "[Five Changes to the OZ Program That Could Be Beneficial in Response to the COVID-19 Crisis](#)," Author, Opportunity Zones Magazine (March 27, 2020)
- "Leveraging & Integrating Programs for Opportunity Zones," Panelist, White House Opportunity Revitalization & Entrepreneurship Summit (March 3, 2020)
- "Arizona Opportunity Zone Forum: Final Regulations Review & Next Steps," Panelist, Arizona Commerce Authority (February 27, 2020)
- "Final Regulations for the Opportunity Zone," Presenter, State Economic Development Executives Network (SEDE) (February 12, 2020)
- "Access to Capital Related Opportunity Zones," Panelist, U.S. Small Business Administration's Opportunity & Entrepreneurship Summit, Las Vegas, NV (February 12, 2020)
- KPMG Conference hosted by the Bay Area Council, Panelist, San Francisco, CA (February 10, 2020)
- "[Sin' Businesses Shackled In Final Opportunity Zone Regs](#)," Quoted, Law360 (January 16, 2020)
- "Opportunity Zone Expert Webinar: Overviews and Updates," Speaker, Hosted by the State of Rhode Island (December 19, 2019)
- International Council of Shopping Centers (ICSC), Speaker and Panelist, Arizona Biltmore, Phoenix, AZ (December 5, 2019)

- "Investors Forum: Answering Critical Questions about Opportunity Funds," Panelist, Arizona Commerce Authority (November 19, 2019)
- "The 2019 REDW Tribal Finance and Leadership Conference," Speaker, Las Vegas, NV (November 13, 2019)
- Opportunity Zone Association of America's Opportunity Zone Catalyst Event, Panelist, Duquesne University, Pittsburgh, PA (November 1, 2019)
- "[How a Tax Break in Poor Arizona Communities Became a Boon for Wealthy Investors](#)," Quoted, USA Today (October 23, 2019)
- State of Colorado Opportunity Zone Conference, The State of Colorado's Office of Economic Development & International Trade, Speaker, Denver, CO (October 20, 2019)
- State of Hawaii Opportunity Zone Program, Panelist and Speaker, Honolulu, HI (October 17, 2019)
- "National Opportunity Zones Webinar," Speaker, Hosted by the Council for Development Finance Agencies (September 24, 2019)
- "[Opportunity Zone Regs May Trigger Biz Property Sales Crunch](#)," Quoted, Law360 (August 14, 2019)
- "[Table of Experts: Opportunity Zones](#)," Panelist, Phoenix Business Journal, (June 28, 2019)
- "[Investors, Developers See a 'Flurry' of Denver Opportunity Zone Activity as Key Deadline Looms](#)," Quoted, Denver Business Journal (June 24, 2019)
- "[An In-Depth Guide To Latest Opportunity Zone Regs: Part 2](#)," Author, Law360 (June 17, 2019)
- "[An In-Depth Guide To Latest Opportunity Zone Regs: Part 1](#)," Author, Law360 (June 14, 2019)
- "Preparing an OZ Project for Investment," Speaker, Hosted by the State of Colorado OEDIT, The Governance Project, and the City of Colorado Springs, Colorado Springs, Colorado (June 13, 2019)
- "The Second Tranche of Proposed Regulations for Opportunity Zones Webinar," Speaker, hosted by the State of Rhode Island (May 21, 2019)
- "The Second Tranche of Proposed Regulations for Opportunity Zones Webinar," Speaker, hosted by the State of Arizona Commerce Authority (May 13, 2019)
- "Opportunity Zone Investments," Speaker, A New Leaf Professional Advisory (May 21, 2019)
- "[4 PE Questions the New Opportunity Zone Regs Don't Answer](#)," Quoted, Law360 (May 13, 2019)
- "Attorney Gets Into Nitty Gritty Details of Opportunity Zones for Multifamily," Featured, Phoenix Business Journal (May 10, 2019)
- "Risk and Reward: Assessing Projects and Deploying Capital Wisely," Panel Moderator, 2019 Opportunity Zone Expo Las Vegas, Mandalay Bay (May 9, 2019)
- "Identifying the Right Opportunity Zone Investments," Panelist, SkyBridge Alternatives (SALT) Conference Las Vegas, Bellagio (May 8, 2019)
- "Deep Dive into OZ Guidance, Part II," Panelist, Novogradac 2019 Opportunity Zones Spring Conference, Denver, Colorado (April 25, 2019)
- "[Treasury Sheds More Light on Opportunity Zone Rules](#)," Quoted, GlobeStreet (April 18, 2019)
- "Rhode Island Opportunity Zone Conference," Speaker, Providence, Rhode Island (February 21, 2019)
- "Opportunity Zone Investing," Panelist, 8<sup>th</sup> Annual REAL Symposium, Stanford Law School (February 7, 2019)
- "[Why PE's 'Opportunity Zone' Plans Remain On Hold](#)," Quoted, Law360 (February 6, 2019)



- "Idaho Opportunity Zones: What You Need to Know," Speaker, Idaho State Bar, Boise, Idaho (January 30, 2019)
- "Opportunity Zones," Co-Presenter, Tucson Tax Study Group (January 2019)
- "Opportunity Zones: Practical Fundamentals and News," Speaker, CREW Utah, Salt Lake City (January 8, 2019)
- "Fundamentals of the Opportunity Zone Program Webinar," Speaker, hosted by the State of Rhode Island (December 19, 2018)
- "Opportunity Zone Conference," Panelist, hosted by the Commonwealth of Massachusetts (December 12, 2018)
- "Opportunity Zones: An In-Depth Analysis of How to Use This Powerful Incentive," Speaker, Seminar, Snell & Wilmer (December 11, 2018)
- "State of Delaware Opportunity Zone Summit," Panelist, hosted by the Biden Institute and the State of Delaware (December 5, 2018)
- "Convening of the State Economic Development Executives (SEDE) Network," Presenter, hosted by the Governor's Office of Economic Development for the State of Utah (December 3, 2018)
- "State of Nevada's Opportunity Zone Conference," Speaker, sponsored by the State of Nevada and the Federal Reserve Bank of San Francisco (November 27, 2018)
- "Opportunity Zone Seminar," Speaker, City of Tempe (November 19, 2018)
- "Aurora, Colorado Opportunity Zone Conference," Speaker, State of Colorado (November 16, 2018)
- "Sterling, Colorado Opportunity Zone Conference," Speaker, State of Colorado (November 15, 2018)
- "Opportunity Zone Seminar," Panelist, NAIOP Utah Chapter (November 14, 2018)
- "Durango, Colorado Opportunity Zone Conference," Speaker, State of Colorado (November 7, 2018)
- "An In-Depth Guide to the Opportunity Zone Guidance: Part 2," Author, Law360 (November 1, 2018)
- "An In-Depth Guide to the Opportunity Zone Guidance: Part 1," Author, Law360 (October 31, 2018)
- "Arizona Commerce Authority: Opportunity Fund Guidance Update Webinar," Speaker, Arizona Commerce Authority (October 30, 2018)
- "[Regulators Release First Guidelines for Opportunity Zones](#)," Quoted, Real Estate Weekly (October 23, 2018)
- "[Taking advantage of opportunity zone investments for tax breaks requires high risk tolerance](#)," Quoted, Investment News (October 22, 2018)
- "Mnuchin's \$100 Billion Market Gets Boost with Rules on Tax Break," Quoted, Bloomberg (October 19, 2018)
- "Understanding the Opportunity Zone Incentive," Speaker, AAED Fall Forum, Flagstaff (October 18, 2018)
- "[The massive GOP tax bill created a powerful incentive to invest in distressed communities - including one in Boulder](#)," Quoted, The Colorado Sun (October 9, 2018)
- "Novogradac 2018 Opportunity Zone Conference," Panelist, New Orleans, Louisiana (October 2, 2018)
- "Arizona Commerce Authority's Opportunity Zone & Funds Conference," Speaker and Panelist, Arizona State University (September 27, 2018)

- ["Opportunity Zones: Seizing the Investment Opportunity in Colorado,"](#) Co-Author, ColoradoBiz (September 17, 2018)
- ["Tax incentives for businesses that invest in underserved areas,"](#) Quoted, Vegas Inc. (September 6, 2018)
- ["10 Questions For Upcoming Opportunity Zone Guidance,"](#) Author, Law360 (September 6, 2018)
- "Colorado Opportunity Zone Conference," Speaker, State of Colorado and City of Aurora, Hyatt Regency Aurora Denver Conference Center (August 22, 2018)
- "How can the O-Zone Benefit My Client?" Co-Presenter, CCIM Southern Nevada Chapter (July 25, 2018)
- "Getting Ahead of the Ball on Opportunity Zones for Economic Development," Co-Presenter, City of Henderson (July 12, 2018)
- ["The Opportunity Zone Program: Deployment of capital: parameters and tax benefits- Part 2,"](#) Author, In Business Magazine (July 2018)
- ["New tax shelter expected to set off a wave of investment in Colorado,"](#) Quoted, The Denver Post (July 6, 2018)
- "Opportunity Zone Conference," Presenter, hosted by the State Colorado OEDIT and DOLA (June 26, 2018)
- ["Tax Guidance Maintains Sunny Outlook For Solar Developers,"](#) Quoted, Law360 (June 25, 2018)
- ["'Opportunity Zones' designated in Logan, providing incentives to investors,"](#) Quoted, The Herald Journal (June 20, 2018)
- ["Questions To Answer Before Investing In An Opportunity Fund,"](#) Author, Law360 (June 12, 2018)
- ["The Opportunity Zone Program: Taking Advantage of a New and Significant Capital Source - Part 1,"](#) Author, In Business Magazine (June 2018)
- "How to Invest with the New Opportunity Zone Program," Presenter, Snell & Wilmer Emerging Business Seminar Series, June 6, 2018
- ["Tax Credits, Tax Reform and Individual Investors: A Fresh Look?,"](#) Co-Authored with James D. Howard, Jr., Journal of Tax Credits (May 2017)
- ["4 Things to Know About Suniva's Solar Cell Tariff Bid,"](#) Quoted, Law 360 (May 17, 2017)
- "Tribal Members and Transactions in Indian Country: Federal, State, and Tribal Tax Principles and Incentives," Presenter, AAED Economic Development Academy of Arizona (May 17, 2017)
- ["Why Phoenix land owners and developers are eager to get started in 'Opportunity Zones',"](#) Quoted, Phoenix Business Journal (April 20, 2018)
- "Opportunity Zones Seminar," Co-Presenter, REIAC Southwest Lunch and Learn (April 19, 2018)
- "Policy Issues," Panelist, Novogradac 2017 Financing Renewable Energy Tax Credits Conference, San Francisco Palace Hotel (May 2017)
- "New Markets Tax Credits," Presenter, Las Vegas Global Economic Alliance Meeting (March 6, 2017)
- "New Markets Tax Credits for Non-Profits," Presenter, Sponsored by Chase, Snell & Wilmer, and JA Barrett Company, Las Vegas, Nevada (September 28, 2016)
- "Tax Credit Financing," Presenter, Arizona Association for Economic Development Fall Forum, Flagstaff, Arizona (September 8, 2016)



- ["The Solar C&I Sector: Making the Case for an Expanded ITC Marketplace,"](#) Author, Renewable Energy World (August 17, 2016)
- "Access to Low-Cost of Capital, New Markets Tax Credits," Panelist, Chase Bank, Phoenix, Arizona (May 2016)
- Novogradac Renewable Energy Tax Credit Financing Conference, Moderator, San Francisco, California, Grand Hyatt (April 2016)
- Novogradac New Markets Tax Credit Financing Conference, Panelist, Scottsdale, Arizona, Fairmont (January 2016)
- 2015 CDFA Arizona Financing Roundtable Conference, Speaker, Phoenix Convention Center (November 2015)
- Novogradac Renewable Energy Financing Conference, Panelist, Las Vegas, Nevada, Four Season (April 2015)
- Novogradac New Markets Tax Credit Financing Conference, Panelist, San Diego, California, Hilton (January 2015)
- ["Closely-Held C Corporations and the Solar Industry: Expanding the ITC Investor Base,"](#) Author, Novogradac Journal of Tax Credits, Volume V, Issue X (October 2014)
- "Stakeholders Say Scarce Renewable Energy Tax Equity Spurs Innovative Financing," Quoted, Novogradac Journal of Tax Credits, Volume V, Issue VI (June 2014)
- Novogradac Financing Renewable Energy Conference, Panelist, San Francisco, California, Four Seasons (April 2014)
- "Taxation of Mergers and Acquisitions," Speaker, Sterling Education Services, Phoenix, Arizona, Embassy Suites (February 2014)
- "Tax Credit Financing," Speaker, Tax Law Section, State Bar of Arizona, Phoenix, Arizona, City Scape (January 2014)
- "New Markets Tax Credits," Presenter, City of Henderson, Henderson Convention Center, Nevada (September 2013)
- "Making New Markets Tax Credits Work for You," Presenter, Tucson, Arizona, Snell & Wilmer (May 2013)
- "PTC Impact on Widespread Renewables Uncertain," Quoted, Fierce Energy (February 2013)
- Novogradac New Markets Tax Credit Conference, Panelist, San Diego, California, The Westin Gaslamp Quarter (January 2013)
- "S Corporations," Speaker, Entrepreneurial CPAs Network, Phoenix, Arizona, Doubletree Suites (January 2013)
- 4th PV Power Plants Conference—USA, Solarpraxis AG, Panelist, Phoenix, Arizona, Sheraton Phoenix Downtown Hotel (November 2012)
- "Using Investment Tax Credits and New Markets Tax Credits," Presenter, Solar Power Project Development Conference, San Diego, California, Andaz Hotel (November 2012)
- "Financing Residential and Commercial Solar Leasing," Moderator and Presenter, The Equipment Leasing and Finance Association (ELFA) Annual Conference, Palm Springs, California, J.W. Marriot Hotel (October 2012)
- "Federal and State New Markets Tax Credits: Mastering the Fundamentals of NMTC Incentives Used in Various Financing Structures," Speaker, National Webinar, Strafford Publications (October 2012)

- "Tax Credit Financing and Renewable Energy," Presenter, Annual Southwest Tax Conference, Nevada Society of CPAs, Bellagio Hotel, Las Vegas, Nevada (December 2011)
- Solar Power Project Development Conference, Presenter, Andaz Hotel, San Diego, California (November 2011)
- "New Markets Tax Credits - Driving Arizona's Economic Growth," Moderator, Co-Hosted with Phoenix Community Development and Investment Corporation and Novogradac & Company LLP, Phoenix (May 2011)
- "Tribal Energy in the Southwest Conference," Presenter, Law Seminars International, Radisson Fort McDowell Resort, Scottsdale (April 2011)
- "Making New Markets Tax Credits Work For You," Moderator, Co-Hosted with Dudley Ventures, Phoenix (March 2011)
- ["IRS Provides Guidance for Residential PV,"](#) Co-Author, Solar Today (March 2011)
- "Tax Credit Financing for Renewable Energy," Presenter, EUEC Energy and Environmental Conference, Phoenix Convention Center (February 2011)
- "Creating and Investing in Opportunity Funds," Presenter, Snell & Wilmer, Phoenix (September 2010)
- "Renewable Energy — Life After the Section 1603 Cash Grant — Not So Fast: Treasury Releases Guidance for Projects Not Placed In Service by the End of 2010," Author, Under Construction Newsletter (August 2010)
- "Significant Guidance for the Residential Solar Industry," Author, The Re-Source (Summer 2010)
- "Using Tax Credits to Enhance Cash Flow," Presenter, CBIZ MHM, LLC, Seminar, Phoenix (May 2010)
- "Driving Recovery: Southwest Credit Markets," Panelist, Co-Hosted with Mutual of Omaha Bank, Phoenix (May 2010)
- "Distributed Generation Solar Project Structuring and Development in the Southwest," Panelist, Greentech Media's 2010 Solar Summit, Phoenix Sheraton (April 2010)
- "Tax Credit Financing in Indian Country," Presenter, Business Development in Indian Country Conference, Sheraton Wild Horse Pass, Phoenix (March 2010)
- The Governor of Arizona's Renewable Energy Summit, Panelist, Arizona State University (February 2010)
- "Tax Credit Financing for Solar," Presenter, CLE Solar Energy Conference, Biltmore Hotel, Phoenix (February 2010)
- "Federal Financing in the 2010 Market," Panelist, Snell & Wilmer, Phoenix (February 2010)
- "Tax Credit Financing for Renewable Energy," Presenter, EUEC Energy and Environmental Conference, Phoenix Convention Center (January 2010)
- "Project Finance: Financing Solar Projects with the 30% Cash Grant," Author, Under Construction Newsletter (November 2009)
- "Tax Credit Financing: An Alternative to Consider," Author, The Corporate Communicator (November 2009)
- "Financing Renewable Energy Projects," Presenter, Sheraton Hotel, Denver, Colorado (September 2009)
- "Fund Formation Basics: Early Considerations for Structuring a Real Estate Fund," Author, The Corporate Communicator (May 2009)

- "Tax Credit Financing," Presenter, Snell & Wilmer, Phoenix (2009)
- "Bridging the Equity Gap," Presenter, Sheraton Hotel, Denver, Colorado (June 2009)
- "New Markets Tax Credits, How the Deal Works," Presenter, Snell & Wilmer, Phoenix (2009)
- "Distributed Solar Energy: Rooftop and Other Onsite Power Generation," Panelist, Sustainability Seminar Series (November 2008)
- "The Investment Tax Credit and Solar Energy Transactions," Presenter, Snell & Wilmer, Phoenix (2008)
- "Like-Kind Exchanges and Tenancy-in-Common Transactions," Featured Speaker, Citigroup, Las Vegas, Nevada (June 2008)
- "Emergency Economic Stabilization Act of 2008," Presenter, Snell & Wilmer, Phoenix and Orange County (2008)
- "Low-Income Housing Tax Credits, Something for Everyone," Author, AZRE, Arizona Commercial Real Estate (September-October 2007)
- "Tax Planning for S Corporations," Presenter, Lorman Seminar, Phoenix (2007-2008)
- "Tax Planning Around the Disguised Sales Rules," Presenter, Lorman Seminar, J.W. Marriot Hotel & Resort, Phoenix (2007)
- "Low Income Housing Tax Credits," Presenter, Snell & Wilmer, Phoenix (2007)
- "Taxation of Internet Transactions," Presenter, Lorman Seminar, Chicago, Illinois (2005)
- "Mergers and Acquisitions," Guest Lecturer, DePaul University School of Law, Chicago, Illinois (2001-2003)
- "Final Regulations for Partnership Mergers and Divisions: a Compromise of Form and Substance," Co-Author, Journal of Passthrough Entities (May-June 2001)
- "Segregating Assets Within a Single Partnership: Delaware Series Partnerships and LLCs," Co-Author, The Tax Magazine (March 2000)
- "Proposed Regulations for Partnership Mergers and Division, Comments," Co-Author, American Bar Association, Tax Section

## **Professional Recognition & Awards**

- The Best Lawyers in America<sup>®</sup>, Tax Law (2021-2024)
- Top 25 OZ Influencers, Category for Top 25 Attorneys, Opportunity Zone Magazine (2019,2022)
- Top Lawyers, Renewable Energy Law, AZ Business Magazine (2013)

## **Community Involvement**

- Boys and Girls Club of Greater Scottsdale, Current Member of Board of Directors
- Uruguay Cultural Foundation for the Arts, Past Member of Board of Directors
- JCYS, Past Member of Board of Directors

## **Previous Professional Experience**

- Dentons LLP, Attorney, Chicago, IL
- University of Illinois-Chicago, Graduate Program of Accountancy, Adjunct Professor

- United States District Court, Northern District of Illinois, Federal Judicial Extern to Hon. Wayne Andersen

## **Bar Admissions**

- Arizona
- Illinois (inactive)

## **Court Admissions**

- Supreme Court of Arizona
- Supreme Court of Illinois
- United States Tax Court