

Todd C. Lady

Partner

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Todd Lady is a partner in the firm's Tax and Business practice groups, focusing on tax-related matters. Mr. Lady has extensive experience providing federal income tax advice with respect to the formation and taxation of corporations, partnerships, and contractual joint venture arrangements both in the domestic and international context. Mr. Lady also has extensive experience in state and local tax disputes.

Mr. Lady represents clients engaging in tax-free reorganization transactions involving both domestic and foreign participants. Mr. Lady also provides advice concerning taxable transactions, including tax planning associated with Internal Revenue Code Section 338.

Mr. Lady's representation of non-U.S. clients includes providing advice with respect to the Foreign Investment in Real Property Tax Act (FIRPTA), the portfolio interest exemption to U.S. withholding tax, application of the "U.S. trade or business" rules, the U.S. branch profits tax, and the application of the U.S. income tax treaty network. Mr. Lady also has experience assisting U.S. clients with the rules applicable to controlled foreign corporations and passive foreign investment companies.

Mr. Lady's practice also includes assisting clients with requesting private letter rulings from the Internal Revenue Service on various matters, preserving tax attributes in the Chapter 11 bankruptcy context, tax considerations associated with the choice of legal entity, and the proper taxation of damages and settlement awards.



Practice Groups:

Personal Tax Planning, Tax Controversy and Litigation, Tax

Bar/Court Admissions:

Federal

U.S. Tax Court

State

District of Columbia, Illinois, Indiana, Texas

Year First Admitted to Practice Law:

2001

Education:

University of Houston Law Center (2001), University of Houston, M.B.A., Finance Concentration (2001), Georgetown University Law center, Master of Laws in Taxation (2004), Purdue University, B.S. (1997)

Professional Affiliations /

Recognitions:

American Bar Association, District of Columbia Bar, International Fiscal Association