



Aman Badyal

Tax Partner

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Aman Badyal is a partner in the firm's Tax Department. Mr. Badyal specializes in providing sophisticated tax advice in connection with various business transactions, including real estate development and investment projects, mergers, acquisitions, reorganizations, cross-border transactions, international investment, and loan workouts. He is currently advising numerous clients in connection with the formation, structuring and operation of Qualified Opportunity Zone Funds. Mr. Badyal regularly represents clients in the real estate, technology, hospitality, investment/finance, and entertainment industries.

Mr. Badyal often speaks at various conferences and continuing education events regarding current issues in the tax world and has taught Taxation of Business Organizations as an Adjunct Professor at Thomas Jefferson School of Law.

Mr. Badyal earned his L.L.M. in Taxation from New York University School of Law, his J.D. from Georgetown University Law Center and a B.A. in Accounting from University of Washington.

PRACTICE AREAS

Tax

EDUCATION

New York University School of Law,
L.L.M., Taxation

Georgetown University, Law Center,
J.D.

University of Washington, B.A.,
Business Administration and
Accounting

STATE BAR ADMISSIONS

California

REPRESENTATIVE MATTERS

Counseled U.S. publicly traded corporation regarding U.S. income tax implications of a reorganization effectuated in connection with delisting the company in the U.S. and relisting it in the majority shareholders' home country.

Worked with a foreign conglomerate's legal and foreign tax advisors in developing a corporate structure that resulted in a zero percent worldwide corporate income tax rate with respect to the client's new product line.

Structured disposition of approximately \$35,000,000 worth of marketable securities by a family investment partnership to avoid the Section 731(c) rules regarding distributions of marketable securities and the S Corporation built-in gains tax with respect to the distributive share of the majority partner.

Structured and formed various Qualified Opportunity Funds and Qualified Opportunity Zone Business Partnerships with respect to investments in a variety of industries, including gold mining, real estate and renewable energy.

Advised various clients in connection with tax issues arising in connection with crypto currency transactions, international crypto currency investment funds and other blockchain-related investments and businesses.