



Private Equity and Real Estate Tax Services

A&M Taxand Services Throughout the Investment Lifecycle

FUND LEVEL	OPERATING COMPANY	
	PRE-ACQUISITION	POST-ACQUISITION
<ul style="list-style-type: none"> ▪ Capital Raising and Equity Structuring ▪ Acquisition Structuring ▪ Modeling and Forecasting ▪ Income Tax Compliance ▪ Sophisticated Income Allocation Methodologies ▪ Allocations of Debt ▪ Built-in Gain and Losses on Contributions ▪ Cancellation of Indebtedness and Worthless Stock Deductions ▪ Redemption of Partnership Interests ▪ Multi-State Tax and International Tax Issues ▪ Fund Level Investor Issues (UBIT, ECI, etc.) 	<ul style="list-style-type: none"> ▪ Integrated Due Diligence <ul style="list-style-type: none"> - Tax - Financial - Operational ▪ Acquisition Structuring ▪ Tax Modeling / Forecasting ▪ REIT Testing ▪ Review of SPA ▪ Assessment of Post-Acquisition Tax Planning ▪ Compensation & Benefits ▪ IP Planning / Transfer Pricing ▪ Valuation ▪ Transfer Tax Matters ▪ Like-kind Exchanges 	<ul style="list-style-type: none"> ▪ Income Tax Compliance <ul style="list-style-type: none"> - Forms 1065, 1120, 1120 REIT, 1120S ▪ Income Tax Provision/Reporting ▪ Purchase Price Accounting ▪ Federal, State, Int'l Tax Advisory ▪ Transaction Cost Analysis ▪ Accounting Methods ▪ R&D/Credits and Incentives ▪ Tax Attribute Optimization ▪ Entity Rationalization ▪ Global Supply Chain / Transfer Pricing ▪ Distribution / Exit Planning & Modeling ▪ Dispute Resolution

A&M Taxand Real Estate Tax Services



TAX COMPLIANCE SERVICES



PLANNING FOR CARRIED INTEREST HOLDERS



REIT FORMATION AND COMPLIANCE



STRUCTURING FOREIGN INVESTMENTS IN U.S. REAL ESTATE



COMPLEX PARTNERSHIP AND MULTI-TIERED INVESTMENT STRUCTURES



STRUCTURING U.S. INVESTMENTS IN FOREIGN REAL ESTATE



JOINT VENTURE PLANNING AND TRANSACTION ANALYSIS



REAL ESTATE TAX RESTRUCTURING ADVISORY



STRUCTURING TAX DEFERRED TRANSACTIONS



REAL ESTATE TRANSFER PRICING ANALYSIS

ALVAREZ & MARSAL

❖ TAXAND



FOR MORE INFORMATION, CONTACT:



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Tyler Horton, a Managing Director with Alvarez & Marsal Taxand, LLC, advises public and closely held business clients, primarily in the private equity and real estate industries. He specializes in technical issues relating to flow-through entities including partnerships and corporations. His experience includes planning for complex transactions and providing a full range of tax services that encompass initial planning through implementation and the preparation of the related tax returns. His practice also includes significant work in the area of IRS audit and other related controversy support.

Mr. Horton has worked with his clients in all phases of their operations advising on both economic and income tax consequences of potential transactions. He has consulted with his clients on the structuring of transactions related to the acquisition and disposition of operating companies as well as major portfolios of real estate assets.

As a result of his work with closely held businesses and their family ownership structures, Mr. Horton has considerable experience in the areas of individual income tax and estate tax planning including the related tax reporting.

ABOUT ALVAREZ & MARSAL TAXAND

Alvarez & Marsal Taxand, an affiliate of, Alvarez & Marsal (A&M) a leading global professional services firm, is an independent tax group made up of experienced tax professionals dedicated to providing customized tax advice to clients and investors across a broad range of industries. Its professionals extend A&M's commitment to offering clients a choice in advisors who are free from audit-based conflicts of interest, and bring an unyielding commitment to delivering responsive client service. A&M Taxand has offices in major metropolitan markets throughout the U.S., and serves the U.K. from its base in London.

Alvarez & Marsal Taxand is a founder of Taxand, the world's largest independent tax organization, which provides high quality, integrated tax advice worldwide. Taxand professionals, including almost 550 partners and more than 2,500 advisors in 50 countries, grasp both the fine points of tax and the broader strategic implications, helping you mitigate risk, manage your tax burden and drive the performance of your business.

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