

# Jeffrey B. Tate

PARTNER

Jeff specializes in transactional tax matters.



## Industries

Fintech  
Real Estate

## Practices

Tax & Wealth Planning

## International

Latin America

## Languages

Portuguese

## Education

Columbia Law School JD, Harlan Fiske Stone  
Scholar, 2008

Brigham Young University M.Acc, Tax Emphasis,  
2004

Brigham Young University BS, Accounting, magna  
cum laude, Heritage Scholar, 2004

## Offices

Washington, DC

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Jeff advises corporate, financial institution, investment fund, and sovereign clients on the tax aspects of domestic and cross-border transactions (including mergers and acquisitions), capital markets transactions, private equity and hedge fund investments and structuring, real estate investments (including REITs), joint ventures, securitizations, financial products, and FATCA compliance.

## Publications, Presentations & Recognitions

Jeff's publications include:

- Co-Author, Chambers Global Practice Guides – Banking and Finance (USA – Law & Practice), 2016–2018
- Co-Author, “Ten Unexpected Issues When a Property Sale Becomes an Entity Sale,” Bloomberg BNA Tax Management Real Estate Journal, May 4, 2016
- Co-Author, “United States and Brazil sign FATCA intergovernmental agreement: e agora?,” Latin American Corporate Counsel Association (LACCA), Oct. 17, 2014
- Co-Author, “FATCA: implications for non-US funds: a general guide for determining the applicability of FATCA to non-USA funds,” Journal of Investment Compliance, Vol. 15 Iss. 4, 2014
- Author, “Debt and Taxes: A Look at the IRS Private Debt Collection Program,” 116 TAX NOTES 583, Aug. 13, 2007

Jeff's speaking engagements include:

- Speaker, “Strategies for Accelerating the Recognition of Gain,” hosted by the D.C. Bar Association (Financial Products Committee of the D.C. Bar Taxation Community), December 8, 2020
- Speaker, “Non-U.S. Investors in Private Funds,” American Bar Association Midyear Tax Meeting, Boca Raton, Florida, January 31, 2020

- Speaker, “Current Tax Topics of Interest for Private Equity Managers,” (“Temas Tributários Atuais de Interesse de Gestores de Private Equity”), hosted by ABVCAP (Brazilian Private Equity Association), São Paulo, Brazil, August 23, 2017
- Speaker, “CRS & 871(m): Satisfying New Reporting Requirements,” hosted by Institute of International Bankers, June 12, 2017
  - Speaker, “EMPEA Fundraising Masterclass,” hosted by EMPEA – Emerging Markets Private Equity Association, Rio de Janeiro, Brazil, April 6, 2015
  - Speaker, “FATCA Implementation for Private Funds,” hosted by the Managed Funds Association, October 30, 2014
  - Speaker, “Implementing & Automating FATCA – Redesigning Your Processes and Infrastructure,” hosted by the Regulatory Compliance Association, November 21, 2013
  - Speaker, “AIFMD and FATCA for Brazilian Asset Managers,” hosted by ANBIMA - Associação Brasileira das Entidades dos Mercados Financeiro e de Capitais, São Paulo and Rio de Janeiro, Brazil, April 10-11, 2013
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## **Bar Admissions**

District of Columbia

New York