

## George J. Schutzer

**Partner**

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### About George

George Schutzer helps business and nonprofit clients on tax matters, focusing on financing transactions, tax-exempt organizations, partnerships, limited liability companies, leasing, mergers and acquisitions and tax provisions relating to energy, the environment and education.

George assists tax-exempt organizations in preparing applications for recognition of tax-exempt status and counsels them on limitations on political activity and lobbying, excess benefit transactions, asset sales, unrelated business taxable income, joint operating agreements, public charity status and deductibility of dues and contributions. He represents nonprofit organizations before the Internal Revenue Service (IRS) and the District of Columbia.

George devotes a substantial portion of his practice to the tax aspects of partnership and limited liability companies, including fund formation. He has advised private equity and mezzanine finance funds and small business investment companies on structuring issues to accommodate tax-exempt and foreign investors. George has special expertise in the tax aspects of savings to finance education, certain environmental excise taxes and taxation of investments in renewable energy. He advises corporations and investment funds on the energy tax incentives in the American Reinvestment and Recovery Act of 2009.

In addition to providing tax assistance in structuring business transactions, George drafts tax legislation and assists clients on complex and technical tax legislative and regulatory projects.

### Experience

- College Savings Bank: Assisted in encouraging states to adopt privatized section 529 plans, drafted comments on proposed Treasury regulations, assisted bank in structuring section 529 program, advised on its acquisition by Pacific LifeCorp and drafted disclosure documents for the bank's section 529, Roth and traditional IRA and education savings account products.
- Escalate Capital: Advised on the tax aspects of the conversion of a fund to a small business investment company, including accommodation of tax-exempt investors, and provided a tax opinion relating to unrelated business income arising from debt financing.

- Professional Beauty Association: Advised trade association on a variety of issues relating to joint ventures, mergers with other trade associations, unrelated business income and other issues applicable to exempt organizations.

## Credentials

### Education

- Yale Law School, J.D., 1980
- Williams College, B.A., *magna cum laude*, 1977

### Admissions

- District of Columbia, 1980

### Courts

- U.S. Tax Court

### Memberships & Affiliations

- American Bar Association, Section of Taxation, Chair, Environmental Taxes Committee, 1996–1998
- District of Columbia Bar, Section of Taxation

## Recognitions

- Recognized in *The Best Lawyers in America* 2023 for Tax Law
- Patton Boggs Pro Bono Partner of the Year (2004)
- FAPAC's *Bridge Builder* Award 2007
- FAPAC's *National Treasure* Award

## Expertise

### Services

- Public Policy
- Public & Infrastructure Finance
- Tax Strategy & Benefits

### Industries

- Healthcare

## Publications

- Co-author, "Tax Regulators Attack Hedge Fund Manager Efforts to Disguise Management Fees," *HedgeFund Law Report*, 2 Parts, August 27, 2015 and November 26, 2015.
- Co-author, "Regulations on Medical Device Excise Tax Proposed," *Tax Planning International: Indirect Taxes*, *Bloomberg BNA*, February 2012.
- Author, "Medical Excise Tax: Avoid Surprises, Seek Answers Now," *Patton Boggs Tax Policy Client Alert*, June 3, 2011.

- Co-author, "IRS Examining Gift Tax on Contributions to Section 501(c)(4) Organizations," *Patton Boggs Tax Policy Client Alert*, May 25, 2011.
- Co-author, "House Committee on Ways and Means Hearing on Fundamental Tax Reform," *Patton Boggs Tax Policy Client Alert*, January 24, 2011.
- Co-author, "Treasury and IRS Request Formal Public Comments on Issues Regarding the Medical Device Excise Tax," *Patton Boggs Tax Client Alert*, December 6, 2010.
- Co-author, "The Medical Device Excise Tax: What You Don't Know Could Cost You," *Patton Boggs Tax Client Alert*, August 25, 2010.
- Co-author, "Tax Provisions in Health Care & Reconciliation Acts," *Patton Boggs Tax Client Alert*, March 31, 2010.
- Co-author, "Congress Expands Access to Build America Bonds to Promote Renewable Energy and Energy Conservation," *Patton Boggs Energy & Tax Law Client Alert*, March 23, 2010.
- Co-author, "Additional Guidance on Foreign Financial Account Reports," *Patton Boggs Tax Client Alert*, March 19, 2010.
- Co-author, "Congress Passes the Foreign Account Tax Compliance Act (FATCA) as Part of the Hire Act," *Patton Boggs Tax Client Alert*, March 19, 2010.
- Co-author, "IRS Provides Safe Harbor on Tax Treatment of Smart Grid Investment Grants to Corporations," *Patton Boggs Energy & Tax Law Client Alert*, March 11, 2010.
- Author, "Recent Tax Law Changes Create New Opportunities for Leasing Wind Energy Property," *The Electricity Journal*, January/February 2010.
- Co-author, "U.S. Departments of Treasury and Energy Jointly Announce Program to Award \$2.3 Billion in Tax Credits to Manufacturers of Advanced Energy Equipment," *Patton Boggs Client Energy Alert*, August 14, 2009.
- Co-Author, "Environmental Settlements Under Intense IRS Scrutiny – No Good Deed Goes Unpunished," *Coal Age Magazine*, July 2009.
- Co-Author, "Beware of the Tax Man," *Aggregates Manager*, July 2009.
- Author, "Grants in Lieu of Energy Investment Credits and Application to Leases," *Patton Boggs Client Energy Alert*, July 2009.

## About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.