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David S.
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Partner

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Advises on the tax aspects of onshore and offshore investment funds, private equity partnerships and their investment managers.

Specifically, David represents investment managers in connection with the formation and the ongoing operation of investment funds, including navigating the tax issues related to the proper documentation and international tax reporting of investors in such funds.

He also represents private equity fund managers in connection with the acquisition and disposition of portfolio investments.

Practices

TAX

INVESTMENT MANAGEMENT

HEDGE FUNDS

PRIVATE EQUITY

BLOCKCHAIN TECHNOLOGY AND DIGITAL ASSETS

CREDIT AND DIRECT LENDING FUNDS

REAL ESTATE

Bar Admissions

New Jersey

New York

Education

University of Pennsylvania Law School, J.D.

- *cum laude*
- Senior Editor, *Journal of International Law*

Yeshiva University, B.A.

- *summa cum laude*

Publications

- “IRS Wins Round One Over Meaning of “Limited Partner” for Self-Employment Income Purposes,” *Hedge Fund Law Report*, February 2024, co-author
- “Recent Tax Court Opinion May Alter Limited Partners’ Self-Employment Tax Liability,” *Schulte Alert*, Nov. 30, 2023
- “New Proposed Regulations Would Affect the Taxation of Foreign Investors in U.S. Real Estate,” *Schulte Alert*, Jan. 6, 2023
- “Schroders’ Acquisition of a Minority Stake in Forteus,” *Global Legal Chronicle*, Aug. 8, 2022 (featured)
- “Tax Update: IRS and New York State Delay April 15 Income Tax Return Filing and Tax Payment (Uncapped) Deadlines Until July 15 (COVID-19),” *Schulte Alert*, April 3, 2020
- *Hedge Funds: Formation, Operation and Regulation*, ALM Law Journal Press (contributor)
- “Year-End FATCA Action Items for Investment Funds That Are Sponsored Entities or Have Investors That Are Sponsored Entities,” *Schulte Alert*, Dec. 9, 2016, co-author
- “LMA Updates its Standard Terms and Conditions to Incorporate FATCA Provisions,” *Schulte Alert*, May 31, 2016, co-author
- “Change in the IRS Approach to the Registration of Disregarded Entities Under FATCA,” *Schulte Alert*, May 2, 2014, co-author
- “FATCA Registration and Compliance Requirements for Hedge Funds,” *Schulte Alert*, April 8, 2014, co-author

Speaking Engagements

- “A Critical Analysis of the Soroban Decision, as Such,” Wall Street Tax Association Virtual Seminar, March 2024
- “The Rise of Private Credit,” 33rd Annual Schulte Private Capital Forum, January 2024
- “Tax Update,” Schulte 32nd Annual Private Investment Funds Seminar, January 2023
- “Tax” and “Blockchain & Digital Assets,” Schulte 31st Annual Private Investment Funds Seminar, January 2022
- “Fund Terms and Tax,” Schulte 30th Annual Private Investment Funds Seminar, January 2021
- “Tax,” Schulte 30th Annual Private Investment Funds Seminar, January 2021
- “Current Tax Issues for Investment Manager Professionals,” Schulte Webinar, November 2020
- “FAQ Regulated Funds,” Schulte 29th Annual Private Investment Funds Seminar, New York, January 2020
- Schulte Luncheon for Investment Manager Tax Professionals, December 2018
- 2018 Fall Tax Meeting, American Bar Association, October 2018
- Schulte Luncheon for Investment Manager Tax Professionals, New York, May 2016
- “Common Reporting Standard: Game Plan for Compliance,” DMS Offshore Investment Services Webinar, December 2015