

Winston Attorneys Discuss Hedge Funds and IRS Partnership Audit Rules

APRIL 26, 2018

Winston & Strawn Partner Olga Loy led a Strafford webinar on April 26, 2018. "[Hedge Funds and IRS Partnership Audit Rules: Advanced Tax Strategies in Structuring Private Investment Funds in Light of New IRS Rules](#)" was a live 90-minute CLE webinar with interactive Q&A.

The IRS partnership audit regulations present significant issues and risks for hedge funds and other private investment fund partnerships. Tax counsel advising private fund partnerships need to fully grasp the importance of the new regulations, both in structuring new funds and modifying existing partnerships. A significant challenge facing fund partnerships and their advisers is addressing the competing tax preferences of different types of fund investors, including U.S. taxable, U.S. tax-exempt, U.S. government, non-U.S. taxable, non-U.S. pension funds, and non-U.S. sovereign investors. Fund structures can include different approaches to using "blockers" and feeder funds to address these various interests and minimize U.S. taxes.

The Winston panel discussed structuring considerations for new funds in light of the new regulations, and detailed necessary adjustments to the operating agreements of currently operating funds and partnerships.

Olga Loy represents funds and fund sponsors in structuring, negotiating, and forming private equity and venture capital funds.

1 Min Read

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