

Jeffrey M. Rosenfeld | Partner

Tax

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Jeffrey Rosenfeld concentrates his practice in the area of business tax law. He counsels public and private corporations, partnerships, and individuals in a broad array of tax matters including:

- Domestic and international tax matters
- State and local tax planning
- Tax-efficient structuring of domestic and international mergers, acquisitions, divestitures, reorganizations, spin-offs, redemptions, and liquidations
- Formation, operation, and acquisition of Subchapter S corporations, partnerships, and limited liability companies
- Federal, state, and local criminal and civil tax controversies, including audits, administrative appeals, and litigation
- Issuances of equity-based compensation

In addition to his tax practice, Jeffrey maintains a corporate practice where he draws upon his tax base to draft, negotiate, and advise clients on limited liability company operating agreements, equity incentive agreements and similar equity-related documents. Jeffrey's experience in this regard spans across many industries, including (most prominently) the private equity industry.

Jeffrey also counsels corporate clients and individuals regarding undeclared foreign bank accounts, including "FBAR" reporting obligations, and has represented numerous clients in the Internal Revenue Service's various voluntary disclosure programs.

Jeffrey also has digital currencies industry experience, including:

- Formation of entities to be engaged in the digital currencies space
- Negotiation, drafting and documentation of governing documents (such as limited liability company agreement) for entities engaged in the digital currencies space
- Compensation and other issues concerning the issuance of digital currencies or the grant of digital currencies to service providers
- Federal income tax consequences associated with the purchase, sale or exchange of digital currencies

Admissions

- Pennsylvania
- New Jersey

Education

- Yeshiva University, BS, cum laude
- University of Pennsylvania Law School, JD, magna cum laude
- New York University School of Law, LLM

Recognitions

2015–2019, “Pennsylvania Rising Star” in Tax, listed in *Super Lawyers*®