



## DAVID G. SHAPIRO

### PARTNER

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David Shapiro advises clients on international and domestic business tax planning, including domestic and cross border expansion, joint ventures, mergers, acquisitions, and financing transactions.

David's practice includes entity formation and structure planning, securities offerings and hybrid financings, joint ventures, and strategic acquisitions and dispositions. Where appropriate, David works with counsel in other jurisdictions to develop efficient cross-border transactional and operational structures. He also assists clients in preparing for and defending against audits and other litigated matters.

Prior to joining Saul Ewing Arnstein & Lehr, David founded and was Managing Member of Shapiro Tax Law LLC, and prior to that was a tax partner of Dechert LLP.

#### SERVICES

Tax  
Corporate  
Emerging Company and  
Entrepreneur Services  
Resources, Access and  
Mentoring Program (RAMP)  
Affordable Housing and Tax  
Advantaged Investments  
Opportunity Zones and  
Qualified Opportunity Funds

#### INDUSTRIES

Hospitality  
Food and Beverage

#### EXPERIENCE

- Advised insurance companies on taxation of novel insurance products and compliance requirements.
- Advised a closely held business in structuring a sale of a minority stake with options to transfer control.
- Advised on multiple restructurings and recapitalizations of domestic and multinational corporations, including the acquisition of outstanding corporate debt.
- Advised a U.S.-based real estate group on structuring Eastern European investments.
- Advised a financial services group on structuring operations in Latin America.
- Advised a closely held business with operations and owners located in and outside the U.S. on structuring and succession planning issues.
- Advised a distributor of mobile applications on structuring sales into the United States.
- Structured joint ventures and investment funds to facilitate cross-border investment by a mix of U.S. and foreign investors.
- Structured and negotiated tax aspects of domestic and cross-border acquisitions and dispositions by companies and funds.
- Managed multiple voluntary disclosure agreements and similar IRS

disclosures.

## HONORS

Named one of "America's Leading Lawyers in Tax Law" by *Chambers USA*, 2018 to present

International Who's Who of Corporate Tax Lawyers, 2012-2018

Named Lawyer on the Fast Track, *Legal Intelligencer* and *Pennsylvania Law Weekly*, 2009

Named a Pennsylvania Super Lawyers Rising Star, 2005-2008, 2011-2012

John S. Nolan Fellow of the American Bar Association Section of Taxation, 2001-2002

## MEMBERSHIPS AND AFFILIATIONS

Board Member, the Theodore Tannenwald Jr. Foundation for Excellence in Tax Scholarship

American Bar Association Section of Taxation

- Chair, Committee on US Activities of Foreigners and Tax Treaties, 2013-2014
- Principal author of comments to the Department of the Treasury and Internal Revenue Service regarding proposed revisions to "anti-inversion" rules
- Co-author of comments to the Department of the Treasury and Internal Revenue Service regarding 2017 tax reform

Adjunct Professor of taxation in the Graduate Tax Program, Villanova University School of Law, 2013-2016.

International Bar Association Taxes Committee

- Treasurer
- Membership Officer, 2017-2018
- Young Lawyers Programme Officer, 2015-2016
- U.S. national tax reporter, 2008-2009
- Co-author of multiple comments to the OECD regarding the "Base Erosion and Profit Shifting" action plan

Philadelphia Bar Association

- Chair, Tax Section, and member of the Board of Governors, 2017-2018
- Co-author of multiple comments to Pennsylvania Department of Revenue regarding state tax implementation

Trustee, Congregation Rodeph Shalom, 2000-2011

Member, Lansdowne Symphony Orchestra, 1999-present

## EDUCATION

J.D., *cum laude*, Duke University School of Law, 1998

- Executive Editor, *Alaska Law Review*

A.B., Yale University, 1995

## BAR ADMISSION

Pennsylvania

## FIRM MANAGEMENT POSITIONS

Tax, Chair

Opportunity Zones and Qualified Opportunity Funds, Vice Chair