

Firm Events | November 3, 2022 | 9:00 AM - 10:00 AM ET

# Secondary Transactions – What Do GPs Need to Know About Tax?

## SPEAKERS

Morgan Klinzing

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**Thursday, November 3 • 1:00 – 2:00 p.m. ET**

During this complimentary webinar, tax attorneys from Troutman Pepper will address hot topics impacting GPs of private funds. Secondaries are increasing in the market. This webinar will address key issues impacting funds and their general partners, such as a GP's withholding obligations on effectively connected income (ECI), seller's indemnification for withholding taxes, the impact of 754 elections and when basis adjustments are mandatory, and publicly traded partnership matters.

The webinar will address the following learning objectives:

- Understanding market practice for certifications and indemnification for ECI and FIRPTA withholding.
- Analyzing the impact of the fund's obligation to withhold on distributions to purchasers which fail to withhold.
- Analyzing whether a 754 election is beneficial or mandatory due to a \$250k inherent loss.
- Understanding the impact of a transfer on the fund's status as a publicly traded partnership issues.

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