



Charles H. Purcell

Partner

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OVERVIEW

Charles Purcell works extensively in the alternative investments areas with a focus on federal and international tax issues. He has broad experience in the formation of domestic and foreign investment funds including private equity, venture, real estate and infrastructure funds and fund-of-funds; large joint venture transactions; mergers and acquisitions; financing and banking transactions; venture capital investments and start-up companies; and compensation of managers, executives and promoters. Charles represents numerous domestic and foreign institutional investors in connection with their alternative investment activities.

Charles also works significantly with developers and investors in alternative energy projects, including solar, biomass and wind energy facilities with a focus on federal and state tax issues. In this regard, he has worked extensively on project finance transactions for developers and investors (including tax equity investors) in the alternative energy area including wind solar and biomass projects. He has worked on over 50 projects in this area. He has also worked on leverage leasing and similar transactions for decades.

Charles is the principal author of the chapter, "Innovation in Tax Credit Structuring for Solar Energy Projects," in the *Energy and Environmental Project Finance Law and Taxation* (2010) published by Oxford University Press.

Charles is the editor-in-chief of *The Limited Liability Company Forms and Practice Manual*, the first limited liability company (LLC) manual for Washington, Oregon and Alaska. He is experienced in the economic analysis of transactions as relevant in the legal context including the analysis of appraisals and appraisal methodology from a tax perspective and financial analysis of benefits of tax structures.

ACHIEVEMENTS

Charles is recognized by peer group publications, including *Best Lawyers in America* (2001-2016, 2020-2021) and *Chambers USA* (2014, 2020), as a leading lawyer in the areas of tax and private equity.

SPEAKING ENGAGEMENTS

- Moderator, "Energy Technology Investment in Washington," 2011 Washington Future Energy Conference, October 2011.

EDUCATION

- J.D., University of Virginia School of Law, 1982
- B.A., University of Virginia, 1977 *with distinction, Echols Scholar*

ADMISSIONS

- Bar of Washington

THOUGHT LEADERSHIP POWERED BY HUB

- 16 November 2020, Energy Storage Handbook Vol. 6 (*Alerts/Updates*)
- 16 September 2020, IRS Issues Section 1061 Proposed Regulations (*Alerts/Updates*)
- 16 June 2020, Motivations & Models for Health Systems Forming Captive Venture Capital Funds (*Alerts/Updates*)
- 28 October 2019, 2019 Offshore Wind Handbook (*Alerts/Updates*)
- 14 November 2018, 2018 Offshore Wind Handbook (*Alerts/Updates*)
- 14 August 2018, Proposed Regulations Provide Welcome Guidance for 20% Pass-Through Deduction (*Alerts/Updates*)
- 3 July 2018, IRS Notice 2018-59 Clarifies Rules on Beginning of Construction of Solar Facilities to Qualify for the Investment Tax Credit (*Alerts/Updates*)
- 11 April 2018, Tax Reform and Investment Management: Does the Foreign-Derived Intangible Income Provision Benefit U.S. Fund Managers? (*Alerts/Updates*)
- 20 February 2018, What Do You Think About...Deemed Repatriation? (*Alerts/Updates*)
- 14 February 2018, Tax Credits for Energy Facilities Extended in New Budget Bill (*BlogPost*)
- January 2018, How the New Tax Bill will Impact the Agribusiness Sector (*Webinar*)
- 18 January 2018, Disposition of a Partnership Interest Now Subject to Tax Withholding (*Alerts/Updates*)
- January 2018, The New Tax Bill Workshop: Impact on M&A Transactions, Choice of Business Entity, and Employee Comp (*Webinar*)
- 8 January 2018, Tax Reform and Investment Management: Certain International Provisions (*Alerts/Updates*)
- 29 December 2017, Tax Reform and Investment Management: Initial Observations (*Alerts/Updates*)
- 21 December 2017, Tax Reform Goes to the President: How Did Renewables Fare? (*Alerts/Updates*)

- 20 December 2017, Just-Passed Tax Cuts and Jobs Act Will Significantly Impact Higher Education (*Alerts/Updates*)
- 15 November 2017, Senate's Version of the "Tax Cuts and Jobs Act" Is Good News for Energy Renewables (*Alerts/Updates*)
- 3 November 2017, GOP's "Tax Cuts and Jobs Act" Trims Renewable Energy and Other Tax Credits (*Alerts/Updates*)
- 22 December 2016, Treasury Guidance Clarifies and (Again) Expands Field of Renewable Energy Projects That May Qualify for the PTC or ITC (*Alerts/Updates*)
- 25 July 2016, New Temporary Regulations Deny Basis Increase in Partnership Interests in Lease Passthrough ITC Structures (*Alerts/Updates*)
- 26 May 2016, New Treasury Guidance Significantly Expands Field of Renewable Energy Projects That May Qualify for the PTC or ITC (*Alerts/Updates*)
- 18 May 2016, Investing in India? Take a Look at the Amended India-Mauritius Tax Treaty Before You Do (*Alerts/Updates*)
- 28 January 2016, Tax Exclusions for Sale of Stock Issued by Qualified Small Business Corporations Becomes Permanent — At Least Temporarily (*Alerts/Updates*)

OTHER PUBLICATIONS

- "Investing In India? Time To Rethink Structures," *Law360*, 3 June 2016
- "The New Do-It-Yourselfers," *The Deal*, October 2006

NEWS & EVENTS

- 27 January 2021, A Sea Change in D.C.: What Does the Future Hold? (*Event*)
- 23 April 2020, K&L Gates, Lawyers Recognized in 2020 Chambers USA Guide (*Rankings & Recognitions*)
- 24 October 2019, K&L Gates Advises Global Infrastructure Partners on Paine Field Passenger Terminal Investment (*Press Release*)
- 3 August 2018, K&L Gates Advises innogy on Acquisition of More Than 2,000 MW Onshore Wind Projects (*Noteworthy Work*)

AREAS OF FOCUS

- Asset Management and Investment Funds
- Capital Markets

- Construction and Infrastructure
- Corporate Governance
- Corporate Tax
- Debt Capital Markets
- Energy Storage and Distributed Resources
- Fintech Lending
- Mergers and Acquisitions
- Nonprofit Organizations
- Power
- Private Equity Transactions
- Public Companies
- Real Estate Finance
- Renewables
- Securitization and Structured Finance

INDUSTRIES

- Consumer Products
- Higher Education Institutions

EMERGING ISSUES

- Opportunity Zones (OZs)