



Louis Tuchman

Partner; Chair, Tax Department

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Louis Tuchman protects the strategic and financial interests of Herrick's clients around the world by clarifying and addressing the tax implications of transactions, financings, litigations, restructurings, contracts and other matters. A partner and chair of the firm's Tax Department, Louis is a creative problem-solver and skilled negotiator, drawing on the breadth of his tax knowledge to help clients achieve their goals. Louis is also a member of the firm's Executive Committee.

Clients look to Louis for guidance on tax issues affecting the entire spectrum of corporate matters. He has provided advice in connection with mergers and acquisitions, net operating loss carryovers and consolidated returns, and counseled entities as to the tax consequences and considerations of loan workouts, both in and out of bankruptcy.

He has worked extensively in structuring real estate investments, focusing on partnerships and limited liability companies, particularly as they are employed in connection with cross-border investments. His experience encompasses large-scale commercial and residential deals, real estate investment trusts (REITs) and Real Estate Mortgage Investment Conduits (REMICs), tax-free exchanges and transfer taxes. He works extensively with families that have diverse real estate portfolios, assisting with planning and strategic decisions, including managing succession to the next generation.

Louis also helps clients manage the complex tax issues involved in art transactions, often addressing sales and use tax concerns related to significant art investments.

He shares his insights through contributions to treatises and publications on the federal taxation of real estate investments and tax consequences of corporate reorganizations. Louis has lectured broadly on tax related topics ranging from the use of family limited partnerships in estate planning to the tax consequences of cross-border real estate financings. He has spoken extensively on the tax incentives available for investors in Qualified Opportunity Zones, and on how to structure those investments to qualify for those tax benefits.

Louis is a member of the firm's Corporate Transparency Act (CTA) working group, providing counsel to businesses and individuals on the broad disclosure obligations under the CTA. He is experienced in advising on CTA requirements and exemptions, filing beneficial ownership information reports (BOI Reports), developing internal procedures to monitor ongoing compliance with the CTA and potential penalties for failure to comply with the CTA. Louis is a frequent author and speaker on the CTA.

Navigating Cross-Border Tax Challenges

Louis is known as a savvy navigator of intricate cross-border tax issues, counseling major foreign corporations in connection with their U.S. corporate acquisitions and joint venture transactions with European partners. For example, Louis recently advised a major family real estate company in Turkey on the tax implications of significant investments in the U.S., an

Israeli company regarding the U.S. taxation of a liquidity event, clarifying and addressing the relevant U.S. tax implications, and a Russian company involved in starting a U.S. operation, helping it to choose the most tax-advantaged domicile for a holding company and the optimal structures for the company's intellectual property.

Services

- Tax
- Private Equity
- Private Investment Funds
- Restructuring & Business Divorce
- Real Estate
- Real Estate Joint Ventures
- Real Estate Hospitality
- Real Estate Workouts, Restructurings & Foreclosures
- Distressed Real Estate
- Affordable Housing & Community Development
- Not-for-Profits
- Opportunity Zones
- Sports
- International
- Israel
- MENA (Middle East and North Africa)
- Nordic
- COVID-19 Task Force and Resource Center
- Corporate Transparency Act Resource Center

Education

- Yale Law School (J.D., 1984)
- Yeshiva University (B.A., *magna cum laude*, 1981)

Recognitions and Accolades

- *The Best Lawyers in America*® - Tax Law (2022 & 2023)
- *Thomson Reuters New York Metro Super Lawyers* (2007, 2011 - 2012, 2014 - 2024)
- *Israel Desks* - Individual Notable Ranking (2022 & 2023)[Award Methodology](#)

Memberships & Associations

- American Bar Association
- New York State Bar Association
 - Tax Section's Committee on Bankruptcy
 - Operating Losses and Committee on Financial Instruments
- Past Chair, New York City Bar Association, Committee on Taxation of Business Entities
- Member, NAREIT