

**SNELL & WILMER ATTORNEY BAHAR SCHIPPEL DISCUSSES PARTNERSHIP AND LLC COMPENSATORY INTERESTS AT 2013 TAX PLANNING CONFERENCE**

**PHOENIX (May 24, 2013)** – Snell & Wilmer is pleased to announce that Bahar Schippel, a partner in the Phoenix office, recently presented at the Practising Law Institute’s (PLI) 2013 Tax Planning for Domestic & Foreign Partnerships, LLCs, Joint Ventures & Other Strategic Alliances conference.

Schippel’s panel focused on Partnership and LLC Compensatory Interests Including Options. An article from *Tax Analysts* that covered the panel stated that Schippel discussed a planning strategy that may enable a partnership to compensate a service provider with a profits interest that entitles him to more than just a flat percentage of future profits. Under the strategy, the service provider receives a profits interest that entitles him to catch up to a pro rata share of existing capital but only to the extent that there are future profits -- without requiring allocations of ordinary income or withholding for those future profits. If the service provider is treated as a partner all along, the back-end payment will be entitled to capital gains treatment and would not trigger tax upfront. [Click here to view the entire article.](#)\*

Schippel is a partner in Snell & Wilmer’s Tax, Employee Benefits & Estate Planning group and is a Certified Specialist in Tax Law with the Arizona Board of Legal Specialization. She specializes in tax planning for mergers and acquisitions, joint ventures and real estate transactions, drafting LLC and partnership agreements, tax planning in connection with fund formation and operations, structuring tax-efficient debt workouts, designing service provider equity compensation for LLCs and partnerships and representing taxpayers before the Internal Revenue Service. She currently serves as the Chair of the Partnership Committee of the ABA Tax Section and is Past Chair of the Tax Section of the State Bar of Arizona. Schippel frequently speaks at national and regional tax conferences and contributes articles to top-tier tax publications. Prior to joining Snell & Wilmer, Schippel served as Attorney-Advisor for the United States Tax Court in Washington, DC, Teaching Assistant to the Honorable David Laro at Georgetown University Law Center, and Associate at Combs, Mack and Lind.

PLI is a non-profit continuing legal education organization chartered by the Regents of the University of the State of New York, founded in 1933. PLI is dedicated to providing the legal community and allied professionals with the most up-to-date, relevant information and techniques which are critical to the development of a professional, competitive edge.

\* The information included in the article (including the summary thereof included herein) is not intended to be legal or tax advice and service providers should consult with their own independent tax advisors before engaging in this structure.

**About Snell & Wilmer L.L.P.**

Founded in 1938, Snell & Wilmer is a full-service business law firm with more than 400 attorneys practicing in nine locations throughout the western United States and in Mexico, including Phoenix and Tucson, Arizona; Los Angeles and Orange County, California; Denver, Colorado; Las Vegas and Reno, Nevada; Salt Lake City, Utah; and Los Cabos, Mexico. The firm represents clients ranging from large, publicly traded corporations to small businesses, individuals and entrepreneurs. For more information, visit [www.swlaw.com](http://www.swlaw.com).

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