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### Practice Areas

Taxation

Mergers and Acquisitions

Business Formation and

Succession Planning

Affordable Housing

Commercial Contracts - Domestic  
and International

Public Finance

Not-for-Profit, Charitable and  
Religious Institutions

## Peter T. Beach

Shareholder

### Practice Focus

Peter has been engaged in providing tax advice exclusively since 1984. He began his career as a tax associate at Miller & Chevalier in Washington, DC and joined Sheehan Phinney in 1996. In 2001, Peter moved to the West Coast as a partner in Ernst & Young's National Office West, specializing in the taxation of mergers and acquisitions. He returned to Sheehan Phinney in 2004.

Peter's practice covers a broad range of tax matters, including mergers and acquisitions, joint ventures, spin-offs, tax-free reorganizations, workouts, partnerships, S corporations, limited liability companies, international taxation, state and local taxation, tax-exempt organizations and tax-exempt financing. He has represented clients in many industries, including: software, telecommunications, healthcare, real estate, natural resources, private equity and venture capital, logistics, education and the public sector. He has assisted both small private and large public companies in connection with tax planning and controversy matters throughout his career. Peter is also a frequent contributor to professional journals and presenter at tax seminars.

### Sample Matters

- Provided guidance for non-profit education/healthcare organization issuing tax-exempt bonds to fund program facilities in multiple states.
- Guided investment company through complex array of financing transactions over a period of years that allowed the company to recapitalize but avoid Section 382 loss limitations, preserving more than \$100 million in net operating losses.
- Managed tax due diligence on more than 30 transactions for both strategic and financial buyers involving targets with market caps ranging from \$4 million to \$45 billion.
- Planned and structured a creative partnership recapitalization that saved \$14 million in federal taxes without triggering reportable transaction status.
- Structured tax aspects of complex \$500 million debt workout that resulted in no recognition of income and minimal attribute reduction.
- Guided tax planning for investment partnerships acquiring forest properties valued at over \$200 million resulting in significant Unrelated Business Taxable Income (UBTI) tax savings for tax-exempt investors.
- Participated in successful lobbying effort to preserve New Hampshire Investment Trust law, which allows mutual funds to operate in New Hampshire free of state tax, and assisted over 20 funds electing to form mutual funds in the state.



**SHEEHAN  
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BASS +  
GREEN PA**  
*the business law firm*

- Guided one of largest nursing home operators in the New Hampshire through complex multi-million-dollar workout, refinancing and merger resulting in significant tax savings and preservation of control.
- Successfully negotiated no-change settlement agreement with New Hampshire Department of Revenue Administration resulting in \$4 million in state tax savings for multinational corporation with multimillion dollar federal transfer-pricing adjustment.
- Successfully negotiated with IRS Appeals Office to settle complex docketed Tax Court case involving inconsistent partnership tax positions taken by multiple partners over several tax years.
- Reached favorable settlements with the New Hampshire Department of Revenue Administration on behalf of taxpayers challenging the constitutionality of a New Hampshire law requiring a partnership to recognize gain when it elects to increase the basis of partnership property on the transfer of a partnership interest.

## Memberships and Admissions

Peter is a member of the New Hampshire, California, District of Columbia, and American Bar Associations and has participated in these organizations' Tax Sections. He is admitted to practice in New Hampshire, California and the District of Columbia and before the United States Tax Court.

## Community Involvement

Peter provides pro bono legal services to the worldwide affiliated non-profit organizations that teach Transcendental Meditation, several of which are located in New Hampshire. He also has served on several NH Bar Association committees, providing tax advice in connection with the drafting and amending of the State's limited liability company and limited partnership statutes. He is a member and Secretary of the Board for the Maharishi Vedic Foundation, and a member of the San Francisco Tax Club.

## Honors

Managing Editor, *Cornell Law Review*.

Peter is listed in *Chambers USA* as one of the top-tier corporate and commercial taxation lawyers in the state of New Hampshire. He was named as one of *The Best Lawyers in America* by Woodward White for both Mergers & Acquisitions law and tax law from 2007 to 2012. Peter has also been named a *New England Super Lawyer* in the area of tax law.

## Education

B.A., *summa cum laude*, Maharishi University of Management

J.D., *magna cum laude*, Cornell University Law School