

SHEEHAN PHINNEY

Peter T. Beach

Shareholder | Manchester, NH

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.



Contact Information

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Key Cases

- Represented two large New Hampshire hospitals in constitutional litigation challenging the New Hampshire Medicaid Enhancement Tax resulting in a ruling that the enabling statute was unconstitutional and leading to a landmark settlement with the State of New Hampshire.
- Represented three New Hampshire hospitals in Medicaid Enhancement Tax administrative refund claims resulting in millions in dollars of refunds for each hospital.
- Reached favorable settlements with the New Hampshire Department of Revenue Administration on behalf of taxpayers challenging the constitutionality of a New Hampshire law requiring certain pass-through and disregarded entities to increase New Hampshire gross business profits in connection with transfers of beneficial interests that result in increases in basis for federal tax purposes.
- Provided tax planning and tax due diligence for both strategic and financial buyers and sellers with a wide range of market caps.
- Provided guidance for non-profit education/healthcare organization issuing tax-exempt bonds to fund program facilities in multiple states.
- Successfully negotiated no-change settlement agreement with New Hampshire Department of Revenue Administration resulting in multimillion dollar state-tax savings for multinational corporation with federal transfer-pricing adjustment.

Practice Areas

- Taxation

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- Tax Litigation
- Corporate
- Healthcare
- Labor & Employment
- Real Estate & Development

Admissions

- State of New Hampshire Bar
- State of California Bar
- District of Columbia Bar
- United States Tax Court
- United States Court of Appeals for the First Circuit
- United States District Court for District of New Hampshire

Education

- J.D., Cornell University Law School, *magna cum laude*
- B.A., Maharishi University of Management, *summa cum laude*

Civic Involvement

- New Hampshire Bar Association Tax Section and several committees, providing tax advice in connection with the drafting and amending of the State's limited liability company and limited partnership statutes
- American Bar Association Tax Section
- California Bar Association Tax Section
- Provides pro bono legal services to several worldwide non-profit meditation organizations

Awards

- Chambers USA, Tax
- Best Lawyers in America® 2023 Manchester Lawyer of the Year, Taxation
- Best Lawyers in America® 2020 Manchester Lawyer of the Year, Taxation
- Best Lawyers in America® 2014 Manchester Lawyer of the Year, Mergers & Acquisitions
- Best Lawyers in America® 2016 Manchester Lawyer of the Year, Tax Law
- Best Lawyers in America®, Litigation & Controversy - Tax, Mergers & Acquisitions Law, Tax Law

Publications

- IRS Announces More Covid-19 Related Tax Deadline Extensions
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Maine, Massachusetts, and Vermont Have Extended Filing and Payment Deadlines for Individual Taxpayers to May 17

- IRS Extends Filing and Payment Deadline for Individual Taxpayers to May 17
- Who benefits from federal housing tax credit changes?
- More Covid-19 Tax Changes: An Overview of Key Tax Provisions in the Consolidated Appropriations Act, 2021
- Treasury Department Issues Guidance Regarding Trump Administration's Payroll Tax Deferral Program
- COVID-19 Impacts on Opportunity Zone Investment Requirements
- 2018 Net Operating Loss Carryback Filing Deadline – June 30, 2020
- Forgiveness of PPP Loans May Be Taxable in NH and MA
- CARES Act Tax Benefits for Individuals
- CARES Act Tax Benefits for Businesses
- Update on Federal and Northern New England State Tax Efforts to Reduce the Economic Impact of COVID-19
- The Coronavirus Aid, Relief, and Economic Security Act (The Cares Act)
- Federal and State Tax Efforts to Reduce the Impact of COVID-19
- Federal Government Takes Fiscal Actions to Reduce Impact of COVID-19 Businesses
- LLC Taxed as an S Corporation- Be Careful
- The Opportunity in Qualified Opportunity Funds
- Client Alert: Overview of the Most Significant Reform of the US Tax Code Since 1986
- Recent Changes to the Tax Rules for Partnership Audits Will Require Nearly Every Partnership and LLC Agreement in the United States to be Amended!
- Review Nonqualified Deferred Compensation Arrangements Now, Before the IRS Shows Up to Audit Them
- "Finders Keepers, Finders Weepers"-What New Hampshire Businesses Need to Know about Unclaimed Property
- Corporate Philanthropy: To Give is to Receive
- If You Think Single-Member Limited Liability Companies are Simple, Think Again!
- Raising Capital for the Emerging Business