

Aman Badyal

PRINCIPAL

Los Angeles, CA | 310.203.5339

abadyal@polsinelli.com



Aman Badyal is a strategic tax advisor to dealmakers, developers and investors shaping complex transactions across real estate, energy and emerging technologies. With a national practice focused on transactional tax, Aman counsels clients on high-value mergers and acquisitions, joint ventures, cross-border investments and distressed asset strategies.

Known for helping clients anticipate and manage tax exposure, he brings particular depth in technology and real estate matters — from crypto fund formation and token monetization to 1031 exchanges and Qualified Opportunity Zone planning. Aman helps real estate developers, fund sponsors, family offices and blockchain-related businesses structure around tax exposure with foresight and precision.

His work includes providing tax advice with respect to:

- Real estate investment, development and disposition transactions, including joint ventures and advanced section 1031 exchanges
- Distressed asset strategies, including loan workouts and recapitalizations
- Mergers, acquisitions and other reorganizations
- Crypto investment funds, DAOs and token issuances
- Qualified Opportunity Zone investments
- Foreign investment in U.S. real property
- California property and transfer tax issues, including Los Angeles “Mansion Tax” (Measure ULA) planning
- Energy tax credits and credit transfers under the Inflation Reduction Act

Aman frequently speaks on evolving tax issues and has served as an adjunct professor at Thomas Jefferson School of Law, where he taught Taxation of Business Organizations.

Education

- New York University School of Law (LL.M., 2005)
 - Taxation
- Georgetown University Law Center (J.D., 2004)
- University of Washington (B.A., 2001)

Capabilities

- Tax
- Corporate & Transactional
- Opportunity Zones
- Real Estate Tax
- Joint Ventures & Strategic Alliances

- Business Administration and Accounting

Bar Admissions

- California

Memberships

- Tax Section of the Los Angeles County Bar Association
 - Member, Executive Committee, 2023-Present
- South Asian Bar Association of San Diego
 - Member, Board of Directors, 2018-2020

Recognition

- Recognized in *The Legal 500 US Elite*, Los Angeles, Tax, 2026

Matters

Aman's notable experience includes advising:

- A real estate developer with respect to tax-efficient strategies surrounding acquisition, development and disposition of numerous tracts of real property impacted by the 2025 LA fires.
- A family with respect to a joint venture to develop low-basis real property in a manner permitting the family to ensure a tax-efficient disposition.
- A real estate investor with respect to a combination forward- reverse section 1031 exchange.
- A family-owned pioneer in light-scattering technology, on tax matters related to its \$1.36 billion sale to a publicly traded corporation.
- A decentralized AI company on domestic and international tax issues arising from blockchain-based platforms that use machine learning to develop investment strategies.
- A digital asset trading company on documentation for tax-efficient crypto lending.
- A family office on income tax planning for the formation of a \$70 million healthcare-focused private equity fund and related management company.
- Green energy companies on Inflation Reduction Act tax credits, including Sections 48C, 45X, 45, 48 and 30C.
- A multinational optical equipment manufacturer on strategies to reduce income apportioned to California.
- A commercial real estate development company on a \$500 million restructuring involving partnership distributions and contributions, reverse 1031 exchanges, and Section 708(b)(2) consolidations and divisions across multiple tax partnerships.
- An Australian family office on structuring the exploitation of health and beauty patents to achieve a zero percent global corporate income tax rate.
- An early Bitcoin investor on monetizing a sizable Bitcoin position in a tax-deferred manner.

Publications

October 15, 2023

What is direct indexing? How you can use it to avoid taxes like the super-rich

Quoted, USA Today

June 26, 2023

Avoiding Negative Tax Consequences In Loan Modifications

Author, Law360

January 2023

A Global Guide for In-House Counsel: Doing Business in a Rapidly Changing World

Quoted, IR Global

October 4, 2019

The Wonderful Land Of OZ: An Overview Of Opportunity Zones

Author, Synergy Environmental Inc.