

Jeffrey A. Goldman

SHAREHOLDER

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Jeffrey Goldman has a wealth of experience in taxation of business enterprises, including corporate and partnership taxation, state and local tax, international tax and tax controversy. He has more than 25 years of experience representing clients in complex tax matters. Jeff's clients range from Fortune 100 companies to family-owned organizations and some of the largest privately-held companies in the country.

Drawing from his years of experience, Jeff's practice also concentrates on providing tax advice and compliance relating to the Opportunity Zones program.

Jeff frequently advises clients on structuring complex domestic international transactions and all types of business transactions, including:

- Real estate and limited liability company/partnership transactions
- Private equity and real estate fund formation
- Opportunity zone planning, formation and compliance
- Mergers and acquisitions

Jeff has experience providing tax counseling to clients various industries, including:

- Real estate
- Manufacturing
- Information technology
- Insurance and financial services
- Energy
- Automotive
- Pharmaceuticals
- Health care

Education

- University of Chicago Law School (J.D., *with honors*, 1990)
 - Order of the Coif
- University of Wisconsin-Milwaukee (B.A., 1987)
 - History

Capabilities

- Tax
- Investment Management & Funds
- Taxation of Business Transactions
- Opportunity Zones
- International Tax
- State & Local Tax
- Tax Controversy & Litigation
- Tax & Financial Services
- Real Estate Tax

Bar Admissions

- Illinois, 1997

Court Admissions

- U.S. Tax Court
- U.S. Court of Appeals, Ninth Circuit
- U.S. District Court, Southern District of New York

Memberships

- American Bar Association
 - Tax Section
- Olympia Fields Country Club
 - President, 2010-2012

Recognition

- Law Clerk for the Honorable Charles L. Levin, Michigan Supreme Court, 1990-1991

Matters

- Represented real estate investment firm in connection with portfolio of real estate of over \$700 million in connection with restructuring of business operations
- Assisting private equity sponsors and clients in establishing funds which have raised and deployed over \$5 billion
- Assisting real estate sponsors and developers in establishing domestic and cross-border funds and joint ventures raising over \$4 billion
- Represented private equity funds in acquisitions and sales of portfolio companies in transactions valued from \$5 million to \$2.5 billion
- Represented clients in establishing opportunity funds and over \$1 billion of qualified investments
- Represented a public multinational in the U.S. Tax Court in connection with an IRS challenge to a cross-border “basis bump” acquisition, where the Tax Court ruled in favor of the taxpayer’s claim for stepped-up basis in assets despite finding strong tax motives for the transaction. Affirmed by the Court of Appeals for the Ninth Circuit
- Representing large public communications entity in Tax Court case involving corporate reorganization and issues of economic substance
- Represented large public transport company in case involving offshore insurance, where the Court of Appeals for the Eleventh Circuit ultimately issued a ruling in favor of the taxpayer, finding that coverage provided by an offshore insurer was true insurance for tax purposes and had true economic substance
- Represented large issuer of annuity contracts in IRS audit and Appeals in matter involving IRS adjustments of over \$50 billion

News

March 20, 2026

Polsinelli Represents Author Capital in Vanta Diagnostics Acquisition

February 19, 2026

Polsinelli Advises Grandview Property Partners in Sale to Artisan Partners

December 9, 2025

Polsinelli Represents Potters' Management Team in Sale to Macquarie-Led Consortium

June 3, 2025

Polsinelli Represents Focus Healthcare Partners in Acquisition of The Harborside

September 10, 2024

Polsinelli Advises Landvault in \$450 Million Acquisition by Infinite Reality

Publications

November 2017

Update: Three Significant Takeaways from the Tax Cuts and Jobs Act

November 2017

House Releases Tax Bill: Talking Points and Takeaways