HUSCH BLACKWELL



Michael Dana

PARTNER

THE LINK VIRTUAL OFFICE*
(AVAILABLE BY APPOINTMENT IN NAPLES, FL)
PHONE: 202.378.2348
EMAIL: MICHAEL.DANA@HUSCHBLACKWELL.COM

OVERVIEW

Michael provides tax and corporate law advice to businesses at all phases of operation, from initial business formation to disposition and all points in between. He practices from Naples, Florida as a member of our virtual office, The Link.

Michael advises clients across virtually all areas of operation regarding U.S. federal income tax issues. He has represented U.S.-based, foreign-based, and multinational enterprises, providing advice in connection with acquisitions, distribution structures, and internal reorganizations, including complex crossborder transactions; U.S. Subpart F income and GILTI planning and analysis; foreign tax credit planning and analysis; tax treaty analysis; and other matters related to outbound and inbound U.S. tax planning. His representations have included business structures, operations, and investments by U.S. clients in, or by non-U.S. clients from, Europe, Canada, Latin America, and a number of other jurisdictions outside of the U.S. He also works with closely held businesses and their owners to develop and implement tax strategies that protect and enhance corporate value.

Michael has broad experience advising private funds, investment management firms, and investment industry professionals. In addition to tax counsel, he often renders advice regarding a host of fund formation issues for private equity and hedge funds. Further, he works with institutional investors, advising them on investments across a range of assets, including alternative investment products.

Industry

Financial Services & Capital Markets

Services

Alternative Investments
Aviation
Capital Markets
Corporate
Crypto, Digital Assets, & Blockchain
Federal Tax Planning
Financial Institutions M&A and Regulatory Compliance
International Tax
Private Equity
Special Situations & Opportunistic Investing
Tax

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Experience

- Represented Community Clinical Research, a Texas-based clinical research organization, with its sale to PhaseWell Research.
- Represented First Citizens Bancshares, Inc. in its all-stock merger with Park National Corporation.
- Advising multi-billion-dollar manufacturing group in Germany regarding U.S. income tax implications of U.S. operations and the restructuring thereof, including various joint ventures.
- Assisting business clients in connection with investing in, or changing domicile to, Puerto Rico, as well as businesses relocating from Puerto Rico to one of the states.
- Identifying treaty-based position for U.K.-based family office with JV in the U.S. resulting in immediate cash savings for client of $800,000.
- Structuring family limited partnerships with assets in excess of $1 billion.
- Advising U.S.-based family office in connection with acquisitions and dispositions of foreign sports teams.
- Representing U.S.-based generic pharmaceutical manufacturer in connection with potential offshore joint ventures.
- Representing U.S.-based family office in connection with joint venture with a Chinese governmental authority.
- Advising clients regarding restructuring family offices for tax efficiency.
- Representing a foreign beer manufacturer in its first joint venture with a domestic beer brewery.
- Advising NFT start-up on all aspects of its business formation and planning.

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Experience

- Assisting sponsor of multiple bitcoin, bitmining and cryptocurrency in investments in a variety of different transactions including the launch of the client's first cryptocurrency hedge fund, the deployment of investment into cryptomining operations and various compliance issues around cryptocurrency.
- Closing a $23 million, offshore, Series A financing for a venture capital company in the pharmaceutical industry.
- Managing a cross-border acquisition by U.S. REIT from project kick-off through deal close.
- Obtaining the concession of all issues from the IRS in a redetermination suit after trial in the U.S. Tax Court, during which Michael was lead trial counsel for the taxpayers.
- Defending successfully large U.S. asset manager in an administrative adjudication in connection with an income tax audit by the District of Columbia.
- Structuring and implementing SPV for $30 million real estate investment.
- Assisting real estate private equity client in developing investment structures to accommodate tax-exempt investment and foreign investment and understanding registration requirements under the Investment Advisers Act.
- Representing service provider in sale of business in excess of $55 million including providing all tax advice in transaction.
- Representing cybersecurity company in sale of its business interests to private equity firm for more than $30 million.
- Implementing a domestic hedge fund using a series limited liability company that closed with $15.6 million in initial capital.
- Implementing a $250 million mezzanine fund focused on investments in the franchised food business.

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Experience

- Advising multiple U.S. subchapter S corporations regarding investments in Canadian business opportunities.
- Identifying an increase available to a client in the net operating loss limitation of an acquired corporate subsidiary by approximately $2 million annually.
- Assisting clients with acquisitions of businesses with residence in U.S.V.I.
- Represented CBC Bancorp in its acquisition of Bay Community Bancorp, an all-cash transaction valued at $14 per common share. The acquisition merged institutions from two of California's largest banking markets, resulting in approximately $3.5 billion in combined assets.
- Served as counsel to NUSO, an omnichannel provider of cloud communications and collaboration solutions, in negotiating strategic partnership with McCarthy Capital to accelerate growth.
- Represented PCB Financial in its recently announced acquisition of Northern California Bancorp where NCB and its wholly owned subsidiary Monterey County Bank are now wholly owned subsidiaries of PCB.
- Advised multiple private businesses and family offices on aircraft acquisitions and compliance with IRS entertainment flight rules, including deduction disallowance, SIFL calculations, and development of aircraft use policies for executive travel.

Recognition

- The Best Lawyers in America©
    - Tax Law, 2021-2027

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Education

- LL.M., Georgetown University Law Center
  - Taxation
- J.D., Georgetown University Law Center
- B.A., Catholic University of America
  - *cum laude*
  - Mathematics and Philosophy

Admissions

- Maryland
- District of Columbia
- Virginia
- Florida
- U.S. District Court, District of Columbia

Community Leadership

- Charity For Change, Director

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*Michael works remotely and is licensed in Florida, practicing in Naples. Contact Michael to set up an in-person consultation by appointment. Use the address 999 Vanderbilt Beach Road, Suite 200, Naples, FL 34108 for mail/deliveries.
**Michael is associated with the Washington, DC office for telephone purposes only.

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