



FRANK A. CRISAFI

Senior Counsel

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BIOGRAPHY

Frank A. Crisafi concentrates in tax law. He was formerly associated with a "Big Four" public accounting firm. His areas of concentration include corporate mergers and acquisitions, partnership taxation, fund formation, real estate investment trust (REIT) taxation, and international tax planning. He has extensive experience in tax planning with respect to the organization and restructuring of business entities: having most recently represented several Japanese sponsors in connection with the structuring and formation of captive REITs as a vehicle for investment in U.S. real estate; advised a Pan European mortgage loan fund in connection with the structuring and offering of investment units within the U.S.; converted a U.S. partnership engaged in the mortgage lending business into a privately-held REIT, and then into a publicly-traded REIT through a merger with a SPAC; represented a publicly-traded REIT in implementing an UPREIT form of organizational structure; and represented a private sponsor in the organization, fund-raising, and subsequent disposition of a privately-held REIT established to engage in the single-family home residential

rental business. Frank also has extensive experience in representing numerous financial institutions in mergers with and acquisitions of other financial institutions and related financial services businesses. During his career, he also has represented a number of domestic private equity funds in connection with fund formation, and the acquisition and disposition of portfolio companies.

Frank also has substantial experience in handling matters at all stages before the Internal Revenue Service ("IRS") and other taxing authorities from the initiation of an audit, negotiation of cases with agents and their supervisors, the appeal of cases before the IRS and docketing cases in the U.S. Tax Court and other courts. The matters have included both domestic and foreign issues, transfer pricing issues, timing of deductions, worthless stock losses, and accounting method issues involving multi-million dollar tax assessments, including penalties.

CIVIC INVOLVEMENT & HONORS

- *Chambers USA*, Georgia (Tax, 2008; 2013; 2017)
- *The Best Lawyers in America*® (Tax Law, 2008-2014, 2020,2023)
- Georgia Super Lawyer (2007-2009; 2012-2019)

PROFESSIONAL AFFILIATIONS

- American Bar Association – International Law Section; Taxation Section
- Certified Public Accountant
- State Bar of Georgia

ADMISSIONS

- Georgia, 1986

EDUCATION

University of Miami, LL.M., 1986

Ohio Northern University, J.D., 1980

Ohio Northern University, B.A., 1977

RELATED PRACTICE AREAS

- Tax Advice & Controversy
- Funds Finance
- Workouts & Financial Restructuring
- Wealth Management
- Subchapter S
- Going Private
- Community Banking Litigation
- De Novo Banking
- Bank Transactions & Strategy
- Bank Regulatory Compliance, Operational Support & New Products
- Financial Institutions
- Data Center & Digital Infrastructure Team
- Real Estate
- Tax & Private Client
- Financial Services Corporate & Regulatory Team
- Healthcare & Life Sciences
- Strategic Alternatives & Corporate Reorganization
- Real Estate Private Equity, Investments & REITs
- Tax Controversy
- Taxation of Corporate Transactions
- Taxation of Financial Transactions & Institutions
- Real Estate Tax
- VAT & Indirect Taxes
- Corporate
- Finance

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