

# Charles H. Purcell

## Partner

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## OVERVIEW

Charles Purcell works extensively in alternative investments areas with a focus on federal and international tax issues. He has broad experience in the formation of domestic and foreign investment funds including private equity; venture; real estate and infrastructure funds and fund-of-funds; large joint venture transactions; mergers and acquisitions; financing and banking transactions; venture capital investments and start-up companies; and compensation of managers, executives and promoters. Charles represents numerous domestic and foreign institutional investors in connection with their alternative investment activities.

Charles also works significantly with developers and investors in alternative energy projects, including solar, biomass, and wind energy facilities with a focus on federal and state tax issues. In this regard, he has worked extensively on project finance transactions for developers and investors (including tax equity investors) in the alternative energy area including wind solar and biomass projects. He has worked on over 50 projects in this area. He has also worked on leverage leasing and similar transactions for decades.

Charles is the principal author of the chapter, “Innovation in Tax Credit Structuring for Solar Energy Projects,” in the *Energy and Environmental Project Finance Law and Taxation* (2010) published by Oxford University Press.

Charles is the editor-in-chief of *The Limited Liability Company Forms and Practice Manual*, the first limited liability company (LLC) manual for Washington, Oregon, and Alaska. He is experienced in the economic analysis of transactions as relevant in the legal context including the analysis of appraisals and appraisal methodology from a tax perspective and financial analysis of benefits of tax structures.

## ACHIEVEMENTS

- Recognized by *Chambers USA* for Tax in Washington, 2014, 2020-2026
- Recognized by *The Best Lawyers in America® in Seattle, WA*
  - Tax Law, 2027
  - Private Equity, 2001-2016, 2020-2023

## SPEAKING ENGAGEMENTS

- Moderator, "Energy Technology Investment in Washington," 2011 Washington Future Energy Conference, October 2011

## EDUCATION

- J.D., University of Virginia School of Law, 1982
- B.A., University of Virginia, 1977 *with distinction, Echols Scholar*

## ADMISSIONS

- Bar of Washington

## THOUGHT LEADERSHIP *POWERED BY HUB*

- June 2026, ESG and the Sustainable Economy Handbook
- 8 August 2025, Amendments to Section 1202 Tax Exclusion for Sale of Qualified Small Business Stock Provide to Lift to Startups and Angel Investors
- 9 April 2024, The Department of Treasury Releases Direct Pay Guidance on Clean Energy Tax Credits
- March 2024, Tax Credit Revolution: Section 6417 Direct Pay Final Regulations
- 28 June 2023, Tax Credit Revolution: Direct Pay and Transferability of Inflation Reduction Act Clean Energy Tax Credits
- 29 March 2023, Washington's Capital Gains Tax Upheld
- 6 July 2021, New Washington State Nonprofit Corporation Act Revitalizes Law Governing Nonprofit Corporations
- 1 June 2021, Washington State Legislature Passes Capital Gains Tax Bill
- 16 September 2020, IRS Issues Section 1061 Proposed Regulations
- 16 June 2020, Motivations & Models for Health Systems Forming Captive Venture Capital Funds
- 14 August 2018, Proposed Regulations Provide Welcome Guidance for 20% Pass-Through Deduction
- 3 July 2018, IRS Notice 2018-59 Clarifies Rules on Beginning of Construction of Solar Facilities to Qualify for the Investment Tax Credit
- 11 April 2018, Tax Reform and Investment Management: Does the Foreign-Derived Intangible Income Provision Benefit U.S. Fund Managers?
- 20 February 2018, What Do You Think About…Deemed Repatriation?

- 14 February 2018, Tax Credits for Energy Facilities Extended in New Budget Bill
- 18 January 2018, Disposition of a Partnership Interest Now Subject to Tax Withholding
- 8 January 2018, Tax Reform and Investment Management: Certain International Provisions
- 29 December 2017, Tax Reform and Investment Management: Initial Observations
- 21 December 2017, Tax Reform Goes to the President: How Did Renewables Fare?
- 20 December 2017, Just-Passed Tax Cuts and Jobs Act Will Significantly Impact Higher Education
- 15 November 2017, Senate's Version of the "Tax Cuts and Jobs Act" Is Good News for Energy Renewables
- 3 November 2017, GOP's "Tax Cuts and Jobs Act" Trims Renewable Energy and Other Tax Credits
- 22 December 2016, Treasury Guidance Clarifies and (Again) Expands Field of Renewable Energy Projects That May Qualify for the PTC or ITC
- 25 July 2016, New Temporary Regulations Deny Basis Increase in Partnership Interests in Lease Passthrough ITC Structures
- 26 May 2016, New Treasury Guidance Significantly Expands Field of Renewable Energy Projects That May Qualify for the PTC or ITC
- 18 May 2016, Investing in India? Take a Look at the Amended India-Mauritius Tax Treaty Before You Do
- 28 January 2016, Tax Exclusions for Sale of Stock Issued by Qualified Small Business Corporations Becomes Permanent — At Least Temporarily

## OTHER PUBLICATIONS

- Federal Government Releases Direct Pay Guidance on Clean Energy Tax Credits," *Pratt's Energy Law Report*, September 2024
- "New way of financing clean energy projects," *Project Finance International (PFI)*, April 2024
- "STRATEGIC PERSPECTIVES: Case study in models for academic health systems structuring venture capital investments: Henry Ford Health System," *Health Law Daily*, 10 September 2021
- "Investing In India? Time To Rethink Structures," *Law360*, 3 June 2016
- "The New Do-It-Yourselfers," *The Deal*, October 2006

## NEWS & EVENTS

- 4 June 2026, K&L Gates Receives Nearly 235 Firm, Individual Rankings in 2026 *Chambers USA* Guide
- 22 September 2025, K&L Gates Advises on Launch of WaterEquity's New Evergreen Fund to Expand Water, Sanitation Access

- 5 June 2025, K&L Gates Receives More Than 240 Firm, Individual Rankings in 2025 *Chambers USA* Guide
- 6 June 2024, K&L Gates Receives More Than 200 Firm, Individual Rankings in 2024 *Chambers USA* Guide
- 1 June 2023, K&L Gates Receives Firm, Individual Rankings in 2023 *Chambers USA* Guide
- 18 August 2022, More Than 350 K&L Gates Lawyers Named Among 2023 Best Lawyers in America, Ones to Watch
- 1 June 2022, K&L Gates Receives Firm, Individual Rankings in 2022 *Chambers USA* Guide
- 13 September 2021, K&L Gates Releases ESG and the Sustainable Economy Handbook
- 19 August 2021, Nearly 300 K&L Gates Lawyers Named Among 2022 Best Lawyers in America, Ones to Watch
- 29 June 2021, K&L Gates Advises Apis & Heritage Capital Partners on Creation of Innovative Legacy Fund
- 24 May 2021, Chambers USA 2021 Guide Recognizes K&L Gates Corporate Practice, Lawyers Among Leaders
- 27 January 2021, A Sea Change in D.C.: What Does the Future Hold?
- 23 April 2020, K&L Gates, Lawyers Recognized in 2020 Chambers USA Guide
- 24 October 2019, K&L Gates Advises Global Infrastructure Partners on Paine Field Passenger Terminal Investment
- 3 August 2018, K&L Gates Advises innogy on Acquisition of More Than 2,000 MW Onshore Wind Projects

## AREAS OF FOCUS

- Asset Management and Investment Funds
- Capital Markets
- Construction and Infrastructure
- Corporate Governance
- Debt Capital Markets
- Fintech Lending
- Mergers and Acquisitions
- Nonprofit Organizations
- Private Equity Transactions
- Public Companies

- Real Estate Finance
- Securitization and Structured Finance
- Tax

## INDUSTRIES

- Consumer Goods and Services
- Energy
- Energy Storage and Distributed Resources
- Financial Services
- Healthcare
- Higher Education Institutions
- Power
- Private Equity
- Renewables

## EMERGING ISSUES

- ESG - Sustainability and Responsible Business