

Sarah A. Breitmeyer

PARTNER

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Sarah Breitmeyer is a partner in the Taxation Department of Chapman and Cutler LLP. She participated in the firm's summer associate program in 2006, and joined the firm in 2007. Prior to joining Chapman and Cutler, Sarah worked as a litigation management coordinator for Special Risk Services Group, LLC.

Sarah provides tax advice related to tax-exempt financings, including new money and refunding financings for the benefit of governmental units, 501(c)(3) organizations and private corporations, and represents governmental issuers, underwriters, investment brokers and borrowers in tax-exempt financing matters. She regularly provides the tax analysis as bond counsel with respect to numerous tax-exempt bond issues for the benefit of 501(c)(3) organizations including colleges and universities, hospitals, museums, cultural institutions and research organizations and has drafted post-issuance tax compliance policies and procedures for numerous 501(c)(3) organizations. Sarah provides advice concerning multipurpose financings, working capital borrowings, tax increment financings, refundings and alternatives to refundings, derivative products, output facilities, post-issuance tax compliance and procedures and defense of IRS audits of tax advantaged obligations. In addition, she has served on comment projects of various industry groups related to working capital financings, management contract guidelines, issue price guidance, legislative proposals and other tax-related matters.

Memberships

National Association of Bond Lawyers

American Bar Association

Admitted

Illinois, 2007

Education

Loyola University Chicago
School of Law, J.D., *magna cum laude*, 2007

University of Illinois at
Urbana-Champaign, B.S.,
2002

Practice Focus

501(c)(3) Not-for-Profit
Finance

Bond Counsel

Governmental Institutions and
Agencies

Health Care Finance

Municipal Bond Tax
Controversy

Not-for-Profit and 501(c)(3)
Organizations

Not-for-Profit Health Care
Finance

Public Finance

Public/Municipal Finance

Special Tax Counsel

State/Local Tax Issues

Taxation

Publications

January 11, 2022

LIBOR Transition Regulations Finalized

- "Tax Management Portfolio No. 183: Tax-Advantaged Bonds," *Bloomberg Tax & Accounting*, December 2019

Presentations

- "Arbitrage and Rebate: Can I Earn It? Can I Keep It?" NABL's The Workshop: Hybrid, October 13–15, 2021
- "Tax Issues in 501(c)(3) Financings," NABL's The Workshop, September 23–25, 2020
- "At the Intersection of Main Street and Wall Street: Tax-Exempt Bonds and Private Business," Illinois GFOA Educational Webinar, September 23, 2020
- "Advanced Tax Topics Regarding Qualified 501(c)(3) Bonds," NABL's The Institute, March 7–8, 2019
- "Tax Issues in 501(c)(3) Financings," NABL's 43rd Annual Bond Attorneys' Workshop, October 26–28, 2018
- "Tax Issues in 501(c)(3) Financings," NABL's 42nd Annual Bond Attorneys' Workshop, October 19–21, 2017
- "The New Money Bond Issue," NABL's 15th Annual Tax and Securities Law Institute, March 9–10, 2017
- "Management and Service Contracts," NABL's 15th Annual Tax and Securities Law Institute, March 9–10, 2017
- "Tax Issues in 501(c)(3) Financings," NABL's 41st Annual Bond Attorneys' Workshop, October 19–21, 2016
- "Tax-Exempt Bond Processes and Rules from Alpha to Omega," The Treasury Institute for Higher Education's Tax-Exempt Bond Compliance Workshop, December 7–9, 2015
- "Remedial Action and Voluntary Closing Agreement Program (VCAP)," The Treasury Institute for Higher Education's Tax-Exempt Bond Compliance Workshop, December 7–9, 2015
- "Private Activity Bonds Tests," NABL 13th Annual Tax & Securities Law Institute, March 5–6, 2015
- "Tax-Exempt Bond Process and Rules from Alpha to Omega," The Treasury Institute for Higher Education's Tax-Exempt Bond Compliance Workshop, December 10–12, 2014
- "Tax Issues for Transactional Lawyers," Chapman and Cutler LLP, July 2013
- "The Bonds are Issued, Then What? Post Issuance Compliance for Municipal Bonds," May 2012
- "Formation and Qualification of Exempt Organizations," March 2012
- "Working Capital Borrowings," February 2012
- "After the Bonds are Issued: IRS Compliance Checks and Resolving Compliance Issues," September 2011
- "Maximizing the Financial Impact of the New Federal Stimulus Law," West Central Municipal Conference, October 2009
- "Economic Disruption, the Stimulus Package and the Effect on the Municipal Bond Market," Women in Public Finance Conference, April 2009

News

December 2020

Sarah Breitmeyer and David Cholst Named Bloomberg Tax and Accounting's Federal Tax Portfolio Authors of the Year