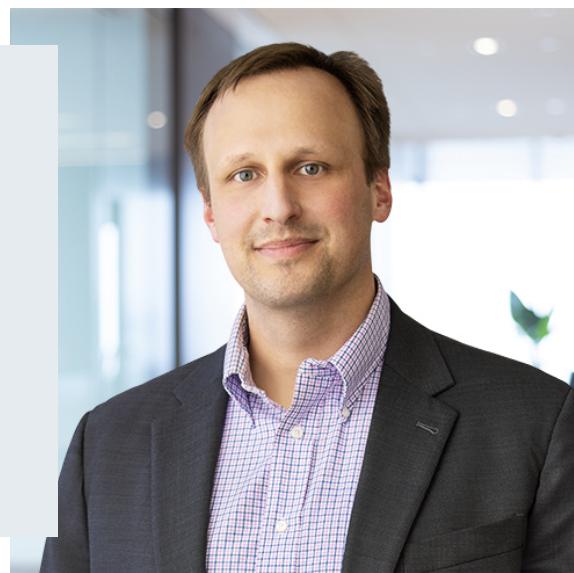


## Adam Schurle

### Partner

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Adam Schurle counsels clients on a wide variety of federal and state tax matters, including issues relating to entity formation; corporate mergers and acquisitions; transactions involving partnerships, S corporations, limited liability companies, and other pass-through entities; and tax aspects of compensation arrangements. He is a Milwaukee-based partner in Foley's Tax Practice Group.

A significant portion of Adam's practice is focused on tax advice for developers and financial institutions in wind, solar, hydroelectric, biomass, and other renewable energy finance transactions. He helps these clients qualify for federal, state, and local tax incentives and implement transaction structures that maximize the value of those incentives. Adam also frequently advises clients with respect to tax incentives related to energy transition projects and investments, including Section 45Q carbon capture and sequestration credits.

#### Affiliations

- Member, Tax Section, American Bar Association
- Member, Tax Section, Minnesota State Bar Association
- Member, Hennepin County Bar Association

#### Presentations and Publications

- Moderator, "IRS Guidance: What's Up, Doc?," Infocast Solar + Wind Finance & Investment Summit, Phoenix, AZ, March 12, 2024
- Presenter, "Section 45V Hydrogen Production Tax Credits," Texas Hydrogen Alliance webinar, February 1, 2024
- Presenter, "Tax Credit Transfer (sale) Transactions," University of Texas Renewable Energy Law Institute, January 31, 2024
- Panelist, "Monetizing Tax Credits: Tax Equity, Transferability, More," Novogradac 2023 Fall Renewable Energy Tax Credits Conference, Washington, D.C., November 2, 2023
- Co-author, "What You Need to Know About the IRA and Tax Equity," PV Tech Power, August 29, 2023

- Moderator, "Labor & Apprenticeship Issues post-Inflation Reduction Act," Infocast Solar + Wind Finance & Investment Summit, March 13, 2023
- Panelist, "Inflation Reduction Act in Wisconsin," RENEW Wisconsin Energy Summit, January 26, 2023
- Presenter, "Carbon Capture & Storage Leases, Tax Incentives, and Emerging Issues," Association of Corporate Counsel CLE, Houston Chapter, September 15, 2022
- Presenter, "Recapture of Section 45Q Tax Credits," Infocast CCS/Decarbonization, Project Development, Finance & Investment Summit, July 25, 2022
- Presenter, "Renewable Energy Law and Incentives Under the Biden Administration," National Business Institute, April 28, 2022
- Co-author, "The Status of Solar and Wind Tax Credits and Tariffs as We Enter 2021," Solar Power World, December 7, 2020
- Presenter, "Working with Cooperatives in Wisconsin—2020," Wisconsin Center for Cooperatives and UW Law and Entrepreneurship Webinar, June 18, 2020
- Author, "Understanding the Tax Impact of Federal COVID-19 Relief Laws," Bench & Bar of Minnesota, May 27, 2020
- Presenter, "Introduction to Cooperative Patronage and Financing of Cooperative Operations," Client Presentation, Viroqua, Wisconsin, December 16, 2019
- Moderator, "Solar Finance for Residential & Commercial Developers: Delivering Options for your Customer Base and Business Health," Gateway to Solar, MnSEIA, October 21, 2019
- Presenter, "Choice of Business Entity after Tax Reform: Re-Evaluating the Best Option," Minnesota CLE, May 6, 2019
- Co-chair and presenter, "Business and Personal Tax Planning: The Impact of the 'Tax Cuts and Jobs Act' and other New Tax Developments," Minnesota CLE, February 26, 2019
- Co-author, "Structuring the Transaction: Tax Considerations," 2018 edition, in *Advising Oregon Businesses*, Oregon State Bar Association
- Presenter, "Choice of Entity: The New Landscape!, Important Tax Considerations for Entities and Owners," Minnesota CLE, October 24, 2018
- Co-author, "Solar Developers Must be Mindful of Looming ITC Deadlines," Solar Industry, September 20, 2018
- Co-author, "With PTC Deadlines Looming, Could Wind Catcher Cancellation be Part of a Trend?," North American Windpower, September 13, 2018
- Presenter, "Choice of Business Entity After Tax Reform: Re-Evaluating the Best Option," Minnesota CLE, May 7, 2018
- Panelist, "Piecing it Together: Trump's Tax Reform and Project Finance," Midwest Solar Expo & Smart Energy Symposium, May 1, 2018
- Presenter, "Energy Project Depreciation and Tax Credits Under the New Tax Bill," Webinar, March 16, 2018
- Moderator, "The New Federal Tax Law," Minnesota CLE, March 2, 2018
- Presenter, "Business Topics in the New Federal Tax Law," Minnesota CLE, February 15, 2018

- Co-author, "Bloomberg BNA Tax and Accounting: Minnesota Corporate Income Tax Navigator," 2016-2017
- Panelist, "What to Expect – Your First Three Years Practicing Tax Law," Mitchell Hamline College of Law, October 27, 2016
- Co-author, "Understanding the Yieldco Structure for Renewable Energy Project Finance," Renewable Energy World Magazine, May/June 2015

## **Sectors**

- [Energy & Infrastructure](#)
- [Food & Beverage](#)
- [Power & Renewables](#)

## **Practice Areas**

- [Corporate](#)
- [Finance](#)
- [Transactions](#)

## **Education**

- University of Florida Levin College of Law (LL.M., 2013)
- University of Oregon School of Law (J.D., 2010)
  - Order of the Coif
  - Managing Editor, *Oregon Law Review*
- Tufts University (B.A., cum laude, 2005)

## **Admissions**

- Minnesota
- Wisconsin
- Nevada (inactive)
- U.S. District Court, District of Nevada
- U.S. Tax Court