

## Brian P. Teaff

Partner

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Brian Teaff has a multifaceted tax practice, advising clients in connection with tax-exempt financings and other business transactions in the public finance area, as well as counseling public charities and private foundations on a wide range of tax planning and compliance matters.

In his public finance practice, Brian serves as tax counsel on governmental and conduit financings where he works with issuers and borrowers to structure the issuance of tax-advantaged obligations. His governmental clients include cities, counties, school districts, hospital districts, community colleges and state universities, and economic development corporations. Brian also represents tax-exempt organizations and private companies, particularly renewable energy companies, who seek to lower their borrowing costs by accessing the tax-exempt bond market. Additionally, Brian helps clients navigate the examination process in the event of an Internal Revenue Service audit.

In his tax-exempt organizations practice, Brian routinely advises hospitals and other health care organizations, colleges and universities, independent and parochial schools, religious organizations of all denominations, charter schools, museums, advocacy groups, grant-making foundations and other nonprofit organizations with respect to the myriad of tax and board governance issues they face on a daily basis. Brian also has experience representing domestic and foreign individuals with respect to their estate, business succession and philanthropic planning.

### Industries

[Finance](#)

[Healthcare](#)

[Infrastructure](#)

### Practices

[Environmental, Social & Governance \(ESG\)](#)

[Healthcare & Life Sciences](#)

[Infrastructure Development](#)

[Public Finance](#)

[Tax](#)

[Tax-Exempt Organizations](#)

[Renewable Natural Gas](#)

[Tax Counsel](#)

[Bond Counsel](#)

[Economic Development](#)

## Experience

### Rice University

- tax counsel to Rice University in connection with \$290.400 million City of Houston Higher Education Finance Corporation Higher Education Revenue Bonds (Rice University Project), Series 2024

### CHRISTUS Health

- tax counsel to CHRISTUS Health in connection with \$218.480 million Tarrant County Cultural Education Facilities Finance Corporation Revenue Bonds (CHRISTUS Health), Series 2024A and \$90.215 million Tarrant County Cultural Education Facilities Finance Corporation Revenue Refunding Bonds (CHRISTUS Health), Series 2024B

### City of Arlington, Texas

- tax counsel in connection with \$75.850 million Permanent Improvement Bonds, Series 2024A; \$7.685 million Permanent Improvement Refunding Bonds, Series 2024B; \$30.045 million Water and Wastewater System Revenue Improvement and Refunding Bonds, Series 2024; and \$9.490 million Municipal Drainage Utility System Revenue Bonds, Series 2024

### SMHA Finance Public Facility Corporation

- tax counsel in connection with \$38 million Multifamily Housing Revenue Bonds (Centerpoint Depot Apartments), Series 2024

### Duncanville Independent School District

- tax counsel in connection with \$166.020 million Unlimited Tax School Building Bonds, Series 2024

### City of Greenville, Texas

- tax counsel in connection with \$100.765 million Waterworks and Sewer System New Lien Revenue Bonds, Series 2024 and \$90.500 million Waterworks and Sewer System New Lien Revenue Bonds, Series 2024A

### Richardson Independent School District

- tax counsel in connection with \$121.210 million Unlimited Tax School Building Bonds, Series 2024

### Little Elm Independent School District

- tax counsel in connection with \$106.435 million Fixed and Variable Rate Unlimited Tax School Building Bonds, Series 2024

## **Collin County, Texas**

- tax counsel in connection with \$198.725 million Limited Tax Permanent Improvement and Refunding Bonds, Series 2024

## **San Antonio Housing Trust Public Facility Corporation**

- tax counsel in connection with \$46.510 million Multifamily Tax-Exempt Bonds (Fannie Mae MBS Secured) (Sageland Flats Apartments), Series 2024A and \$2.286 million Multifamily Housing Revenue Bonds (Sageland Flats Apartments), Series 2024B

## **Cedar Hill Independent School District**

- tax counsel in connection with \$243.400 million Unlimited Tax School Building Bonds, Series 2024

## **The Mesquite Housing Finance Corporation**

- tax counsel in connection with \$37 million Multifamily Housing Revenue Bonds (Palladium Carver Living), Series 2024

## **Texas Children's Hospital**

- tax counsel in connection with \$226.465 million Harris County Cultural Education Facilities Finance Corporation Hospital Revenue Bonds (Texas Children's Hospital), Series 2024A

## **City of Lewisville, Texas**

- tax counsel in connection with \$23.255 million General Obligation Bonds, Series 2024 and \$14.940 million Waterworks and Sewer System Revenue Bonds, Series 2024

## **City of Mesquite, Texas**

- tax counsel in connection with \$34.090 million Combination Tax and Limited Surplus Revenue Certificates of Obligation, Series 2024; \$17.810 million Waterworks and Sewer System Revenue Bonds, Series 2024; and \$15.445 million General Obligation Bonds, Series 2024

## **Pampa Independent School District**

- tax counsel in connection with \$70.650 million Unlimited Tax School Building Bonds, Series 2024

## **EP Essential Housing WF PFC**

- tax counsel in connection with \$143.385 million Residential Development Revenue Bonds (HOME Essential Function Housing Program (Retreat at Mesa Hills) Project), Series 2024

## **Highland Park Independent School District**

- tax counsel in connection with \$112.400 million Unlimited Tax Refunding Bonds, Series 2024

## **City of Seagoville, Texas**

- tax counsel in connection with \$17.999 million Special Assessment Revenue Bonds (Santorini Public Improvement District Improvement Area #1 Project), Series 2024 and \$15.873 million Special Assessment Revenue Bonds (Santorini Public Improvement District Major Improvement Area Project), Series 2024

## **Harris County Industrial Development Corporation**

- tax counsel in the refinancing of \$225 million of tax-exempt bonds issued for the benefit of Energy Transfer LP. The refinanced bonds were issued in the wake of Hurricane Ike to finance the construction of residual and crude oil terminal and dock facilities located in Houston.

## **Multinational investment bank and financial services corporation**

- served as underwriter's counsel for a \$68 million "green bond" offering to finance the construction of a renewable natural gas (RNG) project in Northwest Iowa that will generate RNG captured from dairy cow manure

## **PPL Electric Utilities Corporation**

- remarketing of \$90 million aggregate principal amount of Pennsylvania Economic Development Financing Authority Pollution Control Revenue Refunding Bonds (PPL Electric Utilities Corporation Project)

## **Mission Economic Development Corporation**

- tax counsel in connection with the issuance of \$60 million of Solid Waste Disposal Revenue Bonds (Republic Services, Inc. Project), Series 2020A

## **Mission Economic Development Corporation**

- tax counsel in connection with the issuance of \$50.400 million of Solid Waste Disposal Revenue Bonds (Waste Management, Inc. Project), Series 2020A and \$52 million of Solid Waste Disposal Refunding Revenue Bonds (Waste Management, Inc. Project), Series 2020B

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## **Credentials**

### **Education**

- New York University School of Law, LL.M., Taxation, 2009

# BRACEWELL

- California Western School of Law, J.D., 2008, *magna cum laude*
- University of San Diego, B.A., 2003

## Bar Admissions

- Texas
- California

## Affiliations

- National Association of Bond Lawyers, Past Chair, Tax Law Committee
- California Bar Association
- Honorable Order of Kentucky Colonels

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## Recognition

### ***The Legal 500 United States***

- US Taxes – Non-Contentious, 2019, 2023 – 2024

### **Thomson Reuters**

- *Texas Super Lawyers*, Rising Star, 2013 – 2020

### **National Association of Bond Lawyers**

- President's Service Award, 2023

### **California Western School of Law**

- *California Western Law Review*, Associate Editor
- *California Western International Law Journal*, Associate Editor

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## Resources

### **FY 2021 Sequestration Reduction Rate for Direct Pay Tax Credit Bonds Set at 5.7%**

Update

### **Infrastructure Investment and Jobs Act: Accelerating the Deployment of Hydrogen**

Update

## **Certain CCUS Projects Now Eligible for Financing with Tax-Exempt Bonds**

Update

## **SLGS Window Closing May 2, 2023**

Update

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## **Publications & Speeches**

- "Your Election Passed! What Are the Next Steps for Bond Issuance," 2024 Bonds, Buildings and Beyond Academy, March 27, 2024.
- "Preparing To Deliver the Bond Opinion: Tax Due Diligence and Documentation," NABL The Workshop 2023, October 20, 2023.
- "Arbitrage Basics: Yield Restrictions and Rebate Rules for Tax-Exempt Bonds," Governmental Treasurers Organization of Texas Winter Seminar, February 28, 2023.
- "Preparing to Deliver the Bond Opinion: Tax Diligence and Documentation," NABL U's The Workshop: Hybrid 2022, National Association of Bond Lawyers, October 12-14, 2022.
- "Refunding and Reissuance - Real World Examples," NABL U's The Essentials: Hybrid 2022, National Association of Bond Lawyers, April 22, 2022.
- "Refunding and Reissuance – Basics," NABL U's The Essentials: Hybrid 2022, National Association of Bond Lawyers, April 21, 2022.
- "General Tax Law," NABL U's The Essentials: Hybrid 2022, National Association of Bond Lawyers, April 20, 2022.
- "Current Trends in Exempt Facility Bonds," NABL U's The Institute: Hybrid 2022, National Association of Bond Lawyers, March 3, 2022.
- "General Tax Law" NABL U's The Essentials: Virtual 2021, National Association of Bond Lawyers, June 8-11, 2021.
- "Refunding and Reissuance (Real World Examples)," NABL U's The Essentials: Virtual 2021, National Association of Bond Lawyers, June 8-11, 2021.
- "Refunding and Reissuance," NABL U's The Essentials: Virtual 2021, National Association of Bond Lawyers, June 8-11, 2021.
- "Takeaways for Hospitals from the IRS TE/GE Fiscal Year 2021 Program Letter," American Health Law Association, November 9, 2020.
- "Preparing to Deliver the Bond Opinion: Tax Due Diligence and Documentation," NABL U's The Workshop: Virtual 2020, National Association of Bond Lawyers, September 23-25, 2020.

- “Refunding and Reissuance (Basics),” NABL U’s The Essentials: Virtual 2020, National Association of Bond Lawyers, June 9-12, 2020.
- “Refunding and Reissuance (Real World Examples),” NABL U’s The Essentials: Virtual 2020, National Association of Bond Lawyers, June 9-12, 2020.
- “Qualified 501(c)(3) Bonds,” NABL U’s The Essentials: Virtual 2020, National Association of Bond Lawyers, June 9-12, 2020.
- “Management Contracts: When Good Intentions Can Lead to Disastrous Results,” *American Health Lawyers Association PG Briefing*, January 2020.
- “Alternative Investments Through Opportunity Zones,” Connect Opportunity Zones Conference, October 23, 2019.
- “Opportunity Zones and Other Innovations,” *The Bond Buyer’s Midwest Municipal Market Conference*, June 5, 2019.
- “Tax Exempt Bonds Essentials,” *UT Law’s 2019 Higher Education Taxation Essentials*, June 2, 2019.
- “Form 990, Schedule K,” NABL U Now, National Association of Bond Lawyers, May 3, 2019.
- “Opportunity Zones and You,” NABL U’s The Institute, National Association of Bond Lawyers, March 7-8, 2019.
- “Advanced Tax Topics Regarding Qualified 501(c)(3) Bonds,” NABL U’s The Institute, National Association of Bond Lawyers, March 7-8, 2019.
- “Opportunity Zones: The Promise,” *The Bond Buyer’s Texas Public Finance Conference*, February 12, 2019.
- “Proposed Bill Would Reinstate Tax-Exempt Advance Refundings,” American Health Lawyers Association, February 19, 2019.
- “Final Public Approval Regulations Step into the 21st Century,” *The Bond Buyer*, January 8, 2019.
- “It’s Official! Public Approval Regulations Now Reflect the 21st Century,” TALHFA Talk Winter 2018/2019.
- “No More Advance Refundings!? What Do We Do Now?,” American Health Lawyers Association Webinar, November 2018.
- “Bridging the Gap in Municipal Borrowing,” Lone Star National Bank Seminar, November 2018.
- “IRS Provides Issuers of Tax-Advantaged Debt With New ‘DIY’ Tools to Fix Nonqualified Use,” *Bloomberg Tax*, May 28, 2018.
- “Healthcare Transactions: How to Get to Closing,” UT Law’s 30th Annual Health Law Conference, Houston, April 5, 2018.

- "Mixed Messages on PABs: Fit for the Chopping Block or Cornerstone of Infrastructure Finance?," *Bloomberg Tax*, March 14, 2018.
- "Expert Analysis: The Public Finance Industry Dodged a Tax Reform Bullet," *Law360*, January 12, 2018.
- "As SLGS Window Closes, Tax Reform Continues to Threaten Public Finance," *The Bond Buyer*, December 12, 2017.