DE Darrow Everett LLP



Julie M. Bradlow - Partner

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Bio

Julie M. Bradlow is the Chair of DarrowEverett's Tax Practice Group, and a Practice Leader for its Government Investigations Practice Group. Her background encompasses federal, state, and international tax planning, tax controversy, employee benefits, executive compensation, corporate law, and regulatory matters. Together with an understanding of such broad-based subject matter, Julie brings practical experience to solving complex problems for her clients.

Practice Areas

- <u>Tax</u>
- Corporate & Business Transactions
- Government Investigations

Prior Experience

Prior to joining the DarrowEverett team, Julie served as in-house tax counsel at Fortune 500 aerospace and transportation companies, as well as at two Am Law 200 law firms and a boutique law firm, where she advised on a wide variety of federal, state, and international tax and employee benefits matters. While at the University of Chicago Law School, Julie was an Associate Editor for the University of Chicago Law Review. Before entering practice, she served as a judicial clerk to the Honorable Michael S. Kanne of the United States Court of Appeals for the Seventh Circuit. In 2017, Julie was a contestant on the game show *Jeopardy!*

Representative Matters

- Represented a prominent New York-based investment firm in a Series B preferred equity financing, supporting its investment in a rapidly expanding, multistate provider of interactive and sensory-related experiences. Our team delivered end-to-end legal counsel, including conducting thorough due diligence, drafting and negotiating equity financing documents, and navigating the transaction through to closing.
- Represented a South Florida real estate developer and a South Florida private equity family
 office in connection with their joint venture acquisition of a national big box retailer's
 corporate headquarters for more than \$100 million. This transaction involved the creation
 of several layers of legal entities, drafting LLC and LP agreements, and the creation of a
 tenancy in common agreement including several 1031 exchange entities.
- Represented an alternative asset management firm in establishing a private equity fund poised to issue securities pursuant to Rule 506(c). The representation included reviewing partnership documents and the tax allocations therein as well as drafting tax disclosures for the private offering memorandum. The fund was established to raise up to \$150 million to acquire and invest in single family rental properties across multiple U.S. states.
- Represented prominent South Florida real estate developer in its eight-figure purchase of a mixed-use development south of Miami featuring retail and office space. We set up a securities offering under Rule 506(b) that helped fund the deal, and we drafted all the offering documents including the limited partnership agreement and private placement memorandum for the fund.
- Represented innovative, next-generation real estate investment firm in creating three complex offerings of securities under Rule 506(c) in connection with a residential real estate investment fund. The tax work included reviewing partnership allocations in limited partnership agreements and tax disclosures in offering memoranda.
- Represented a national meat producer, packager and distributor, and a leading U.S. private equity firm with a minority stake in the meat company, in connection with their add-on acquisitions of two prominent meat suppliers. The transaction included implementation of a complex corporate reorganization structure.

Insights

- The Tax Implications of Divorce: Alimony, Child Support, IRAs and More via JD Supra, December, 2024
- Maximizing Value: The Art of Purchase Price Allocation in Real Estate Deals via JD Supra, August, 2024
- IRS Targeting Partnership Basis-Shifting Transaction Schemes via JD Supra, July, 2024
- 'As Such': Soroban Case Puts Limited Partnerships Under Tax Scrutiny via JD Supra, February, 2024
- The Brass Tacks: IRS Creates Process for Withdrawing ERC Claims via JD Supra, November, 2023

Media Appearances

- Video Interview: Exploring Corporate Structuring And M&A (March 2024)
- Podcast Interview: <u>Discussing the Intersection of Business Law With Tax Law (November 2023)</u>

Bar Admissions

- North Carolina
- Virginia
- Illinois
- United States Court of Appeals for the Seventh Circuit
- United States District Court for the Eastern and Western Districts of North Carolina
- United States District Court for the Northern District of Illinois
- United States Tax Court

Education

- University of Chicago Law School, J.D.
- Yale University, B.A., French

Accolades

Business North Carolina's Legal Elite <u>2023</u> and <u>2024</u>: Tax & Estate Planning Category