

David Mayhall

Managing Associate



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Overview

David is a member of Dentons' Tax group.

He represents clients in civil tax controversies before the Internal Revenue Service (IRS), including examinations, appeals and US Tax Court matters.

David advises clients on tax legislation, including the implementation of the partnership audit regime under the Bipartisan Budget Act of 2015 (BBA) and the Tax Cuts and Jobs Act (TCJA). He also advises on domestic and international corporate transactions, as well as multijurisdictional tax issues relating to sourcing, foreign tax credits, the subpart F regime, effectively connected income, and treaties, as well as preparing related memorandums and tax opinions.

David also has experience with debt/equity issues, valuation and appraisal disputes, non-profit organizations, inadvertent S-Corporation terminations, allowable business deductions, and private letter rulings.

Insights

- "[OECD updates game plan for taxation of the digital economy](#)," Dentons client alert, October 10, 2019

Areas of focus

Practices

- Tax

Education

- New York University, School of Law, 2016, LL.M., Taxation

- Southern University Law Center, 2015, Juris Doctor, *magna cum laude*
- Louisiana State University, 2012, BA, Psychology

Admissions and qualifications

- District of Columbia
- Louisiana