

### Financial Research Associates Private Investment Fund Tax Master Class

**Presented by Financial Research Associates (FRA) Conferences**

May 23–24, 2022

Jill Darrow, a partner in the Transactional Tax Planning practice, will speak on "Offshore Lenders: Loan Origination Essentials Not to Be Missed" at 9:10 a.m. on Tuesday, May 24. Speakers will:

- Survey what to consider in lending to US borrowers
- Inform on what defines a lending activity as regular and continuous
- Discuss lending through an independent agent, what constitutes independence, and whether it matters
- Consider what constitutes a secondary market for the purchase of a loan
- Weigh private negotiation versus private or public offering for convertible debt

[Learn more about the Financial Research Associates Private Investment Fund Tax Master Class.](#)

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#### CONTACTS

For more information, contact your Katten attorney or any of the following attorneys.

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