



Sarah Tomeo Hertzog

OF COUNSEL

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Sarah Tomeo Hertzog works with colleges, universities, other nonprofit organizations, and their donors regarding the structure, implementation, and administration of planned giving arrangements, including charitable remainder trusts, pledges, and gift agreements. In addition, she advises tax-exempt organizations, including healthcare organizations, private foundations and other nonprofits, in connection with grant making, formations, reorganizations, and investment activities.

Sarah also has a wide range of experience advising private investment fund managers and investors on the formation and operation of private equity and hedge funds.

Focus Areas
Choate Wealth

Admissions

- Massachusetts
- District of Columbia

Representative Engagements

- Assists universities and colleges, secondary schools, hospitals, and other nonprofit institutions negotiate, draft, accept, and administer outright and planned gifts, including charitable remainder trusts, charitable lead trusts, charitable gift annuities, retained life estates, and more.
- Assists nonprofit institutions seeking to accept, and individual clients seeking to make, charitable gifts of complex assets, such as interests in investment partnerships, cryptocurrency, and real estate.
- Provides thoughtful, creative strategies to high-net-worth families developing and implementing their philanthropic objectives.
- Provides regular counsel to sponsoring organizations of donor advised funds affiliated with private investment managers.
- Advises nonprofit institutions regarding the administration of endowment funds and restricted gifts, including by obtaining court and Attorney General approvals of required modifications.
- Assists private foundations to understand and comply with the complex tax rules applicable to foundations, and represents private foundations seeking to correct compliance errors with the Internal Revenue Service.
- Counseled, and provides ongoing advice to, supporting organizations that reorganized as private foundations.
- Represented sponsoring organization of donor advised funds in submitting comments to the Treasury Department on proposed regulations on donor advised funds.

- Represented large health care system in connection with restructuring of medical university.
- Advised health care organizations voluntarily reclassifying independent contractors as employees.
- Represented private foundations, university endowments, and funds of funds in their investments in private equity, hedge funds, and real estate.
- Advised private equity and hedge fund managers on fund formations, reorganizations, and a variety of ongoing tax matters.