Tucker Ellis LLP

Peter A. Igel

Partner

950 Main Avenue,
Suite 1100
Cleveland, OH 44113-7213

D 216.696.5084
F 216.592.5009
M 440.227.3365
peter.igel@tuckerellis.com

Peter Igel chairs the Tucker Ellis Tax Group. He teams up with our transactional lawyers to structure mergers, acquisitions, divestitures, investments, and other deals to remove obstacles standing between our clients and their goals.

His approach is to look for creative yet practical solutions and explain them in plain English. Rather than saying “no,” Peter presents clients with creative options that will allow their plans to proceed.

Given the broad reach of the tax laws, nearly all types of Tucker Ellis business clients call on Peter for his advice. He commonly serves publicly traded corporations, privately held businesses and their owners, investment funds, financial institutions, governmental entities issuing municipal bonds, high net worth individuals, non-profit organizations, and healthcare providers. Peter also serves as a member of the firm’s Opinion and Audit Letter Committee.

Peter enjoys kayaking, other outdoor sports, and genealogy.

Education

- The Ohio State University College of Law (J.D., with honors, 1986)
- Miami University (B.S., 1982)

State Admissions

- Ohio, 1986

Federal Admissions

- United States Tax Court
- United States Court of Appeals, Sixth Circuit
- United States District Court, Northern District of Ohio
- United States District Court, Southern District of Ohio

Certifications

- OSBA Certified Specialist in Federal Taxation
- Certified Public Accountant (Ohio, Inactive)

Service Areas

- Tax Services
- Mergers & Acquisitions
- Corporate Law
- Public & Structured Finance
- Health Care
- Nonprofit Organizations
- White Collar Criminal Defense & Corporate Investigations
- Financial Services – Transactional
- Hospitality
- Opportunity Zones
- Venture Capital
- Private Equity
- Educational Institutions
- Health & Life Sciences
- Financial Services
- Estate, Trust, and Fiduciary Litigation
- Estates, Trusts & Probate

Industries Represented

- Financial Investment Companies
- Funds & Trusts
- Government
- Healthcare Professionals
- Hospitals
- Manufacturing
- Nonprofit Organizations
- Nursing & Residential Care Facilities
- Real Estate
- Tax Services

Experience

TAX, MERGERS & ACQUISITIONS

- Advised Kid Works Creative Learning Centers in the sale of the business to a large national operator of childcare centers, including the sale of four associated real-estate properties to a different third-party buyer, boosting transaction value for our client
- Represented publicly traded and privately held corporations in taxable acquisitions and dispositions (“F Reorganizations”), as well as tax-free transactions using mergers, stock swaps, stock for assets exchanges, spin-offs, and other creative structures
- Worked with bankruptcy partners to restructure troubled businesses using methods to avoid tax on debt forgiveness
- Drafted LLC operating agreements and limited partnership agreements with sophisticated distribution waterfalls, income/loss allocations, and built-in gains allocations
- Obtained Private Letter Rulings from the Internal Revenue Service to guarantee tax consequences before entering into transactions
- Defended taxpayers in audits, appeals, and litigation in federal income and estate taxes up to the U.S. Tax Court
- Defended taxpayers in Ohio sales, income, commercial activity, corporate franchise, and personal property tax cases up to the Ohio Supreme Court

PUBLIC FINANCE

- Advised issuers, underwriters, and conduit borrowers on tax issues involved in general obligation issues, industrial revenue bond financing, and qualified 501(c)(3) financing in transactions up to $1 billion
- Advised governmental entities and developers on structure of public/private partnerships
- Served as bond counsel in Ohio’s largest issue of Recovery Zone Economic Development Bonds after passage of the 2009 Stimulus Bill
- Arranged combinations of tax-exempt and taxable financing of major league and minor league professional sports stadiums based upon anticipated levels of public versus private debt service

EXEMPT ORGANIZATIONS AND HEALTHCARE

- Advised healthcare providers and other tax-exempt organizations on internal reorganizations and minimization of unrelated business income
- Advised exempt organizations participating in joint ventures with for-profits on protecting their tax-exempt status and avoiding unrelated business income
- Formed, obtained tax qualification, maintained, and dissolved dozens of private foundations for wealthy families and advised on proposed related party transactions
- Serve as outside counsel for a professional trade association

WHITE COLLAR DEFENSE AND INVESTIGATIONS

- Obtained acceptance into an IRS voluntary disclosure program for a taxpayer holding

undisclosed offshore investment accounts and real estate interests
- As co-counsel, examined substantive tax issues affecting clients under investigation to reduce tax deficiencies and offense levels

ESTATES, TRUSTS AND PROBATE

- Helped high net worth individuals save estate and gift taxes through the establishment of GRATs, CLATs, CLUTs, CRUTs, sales to grantor trusts, and other tax reduction techniques
- Preserved the discount claimed on a family limited partnership in a $2-million estate tax case; a fresh look revealed a novel legal argument which persuaded the IRS to settle

Publications & Events

SPEAKING ENGAGEMENTS

- “Selected Partnership Issues: Section 754 Basis Adjustment; Section 704 Allocations; Partnership Audit Rules,” 68th Annual Cleveland Tax Institute, Cleveland Metropolitan Bar Association, Cleveland, Ohio (November 2025)
- “Entity Transition Management-Redemptions: Buy-Sells, Connelly/Life Insurance, and Divorce Issues,” 67th Annual Cleveland Tax Institute, Cleveland Metropolitan Bar Association (November 2024)
- “Who Benefits from Tax and ERISA Reviews in M&A Transactions?”, 2023 Business Law Institute on Corporate Law and M&A, Tucker Ellis LLP (January 2023)
- “Charitable Giving as Part of Your Tax and Estate Planning,” Professional Advisors Seminar, Catholic Community Foundation, Cleveland, Ohio (November 2019)
- “Corporate Tax and Related Topics,” 61st Annual Cleveland Tax Institute, Cleveland Metropolitan Bar Association, Cleveland, Ohio (November 2018)
- “Tax Exempt Organization Workshop,” Northeastern Ohio Inter-Museum Council, Independence, Ohio (March 2018)
- “Negotiating the Sale of an S Corporation,” 60th Annual Cleveland Tax Institute, Cleveland, Ohio (November 2017)
- “Professional Standards for Tax-Related Advice,” Tucker Ellis Ohio Professional Conduct Program, Cleveland, Ohio (December 2015)
- “But What Must We Render Unto Caesar?”, Ohio Professional Conduct Program, Tucker Ellis LLP, Cleveland, Ohio (December 2014)
- “Filing for Recognition as a Tax-Exempt Organization,” Ohio State Bar Association webcast (2014)
- “Responsibilities of a Non-Profit Board Member,” Ohio Society of CPAs Member’s Summit (2008) and Ohio Accounting Show (2011)
- “Valuations – Approach and Strategy,” Cleveland Tax Institute, Cleveland, Ohio (2010)

PUBLICATIONS

- “How to Protect Inherited IRAs,” *Crain’s Cleveland Business* (November 2014)

Honors

- The Best Lawyers in America® (2016–2026)
- Martindale-Hubbell® AV Preeminent® Peer Rating

In the Community

- National Association of Bond Lawyers
- Cleveland Metropolitan Bar Association
  - » General Tax Committee, Former Chair
  - » Estate Planning Probate & Trust Committee, Former Chair
- St. Edward High School Performing Arts Boosters Club, Past President
- Cleveland Tax Institute
  - » Chair (2015)
  - » Vice Chair (2014)
  - » Program Chair (2013)
- Cleveland Sight Center, Board of Trustees (2020–present)
  - » Development and Planned Giving Committee