

R. Todd

Partner

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Todd Greenwalt works with governmental entities and tax-exempt organizations, advising them with regard to tax-exempt financings and other business transactions, and resolving tax-exempt status issues. His clients include all types of state and local governmental entities, hospitals, other health care organizations, colleges and universities, charter schools, museums, arts organizations, community and economic development organizations, private foundations, advocacy groups and other charities. Todd provides federal income tax advice as bond counsel, underwriter's counsel and borrower's counsel in connection with tax-exempt financings and advises tax-exempt organizations on a wide-range of federal tax and state nonprofit law issues, including formation and application for tax-exempt status, unrelated business income tax, intermediate sanctions, IRS examinations, accountable care organizations and other health care-specific issues and structuring joint ventures to comply with IRS guidelines.

Industries

[Finance](#)

[Healthcare](#)

Practices

[Healthcare & Life Sciences](#)

[Public Finance](#)

[Tax](#)

[Tax-Exempt Organizations](#)

[Tax Counsel](#)

[Bond Counsel](#)

Credentials

Education

- The University of Georgia, J.D., 1980
- The University of Denver, Daniels College of Business, B.A., 1980, *with highest distinction*

Bar Admissions

- Texas

Chambers USA

- Texas Tax, 2024

The Legal 500 United States

- US Taxes – Non-Contentious, 2019 – 2024

BL Rankings

- *Best Lawyers*, Public Finance Law, 2013 – 2025
- *Best Lawyers*, Tax Law, 2018 – 2025
- *Best Lawyers*, Securitization and Structured Finance Law, 2023 – 2025
- Houston Lawyer of the Year, Public Finance Law, 2017, 2019, 2024

Thomson Reuters

- *Texas Super Lawyers*, 2003 – 2011

Resources

FY 2021 Sequestration Reduction Rate for Direct Pay Tax Credit Bonds Set at 5.7%

Update

SLGS Window Closing May 2, 2023

Update

Publications & Speeches

- "Management Contracts: When Good Intentions Can Lead to Disastrous Results," *American Health Lawyers Association PG Briefing*, January 2020.
- "Tax Issues in Qualified 501(c)(3) Financings," *National Association of Bond Lawyers Bond Attorney Workshop*, October 2018.
- "As SLGS Window Closes, Tax Reform Continues to Threaten Public Finance," *The Bond Buyer*, December 12, 2017.
- "Written Policies and Procedures" and "Private Business Use," *2016 Post Issuance Compliance Seminar - First Southwest*, May 2016.
- "Commentary: Simplified Settlement Procedures for Issuers of 501(c)(3) Bonds," *The Bond Buyer*, January 2015.
- "Effective Committee Structures for Non-Profit Corporations," *Annual Texas Bar Continuing Legal Education Program*, August 22-23, 2013.