



P: 919-869-3080

echaney@schellbray.com

Edward T. Chaney

Member

Ed Chaney focuses his practice on advising a broad range of nonprofit organizations on key tax and corporate matters, including organization formation and governance, 501(c)(3) tax exemption and ongoing compliance, charitable giving, program-related and impact investing, and complex organizational structures, transactions, and transitions.

Mr. Chaney has extensive experience in advising philanthropic organizations on operational and tax compliance matters, including donor advised fund operations, private foundation grant making, and program-related investments. He also advises on the tax requirements for supporting organizations, the structuring of substantial charitable gifts, and the governance of endowment funds. He has counseled philanthropic clients of many sizes and forms, including community foundations, small and large private foundations, national donor advised fund sponsors, and university-related foundations.

Mr. Chaney also regularly advises a wide variety of operating nonprofits on their governance, tax compliance, and transactional needs. Clients have included community economic development and affordable housing organizations, colleges and universities, charter school management organizations, public education and advocacy organizations, performing arts organizations, industry associations, and many more. A sampling of special matters he has managed include:

- Successfully contesting a proposed adverse determination by the IRS and obtaining tax exemption for a charter school management organization, which helped changed the IRS position on such entities;
- Serving as outside general counsel to an ongoing joint venture of the leading national organizations in neighborhood stabilization;
- Helping two of the nation's premier nonprofit affordable housing organizations form a strategic alliance through a corporate and tax reorganization; and,
- Serving as 501(c)(3) tax-counsel to a public charity affordable housing organization in the development of a multi-tiered affordable housing investment structure that attracted more than \$100 million in philanthropic and private social investment.
- Mr. Chaney speaks, writes, and teaches frequently on the law of nonprofit and tax-exempt organizations. Among other engagements, he has presented at Georgetown University Law Center CLE's Representing and Managing Tax-Exempt Organizations and at the University of Texas School of Law CLE's Nonprofit Organizations Institute. He recently served as an

Practice Areas

Tax-Exempt Organizations

Trusts and Estates

Education

University of North Carolina, B.A., 1994

University of North Carolina, J.D.,
with honors, 2007

Bar Admissions

North Carolina

District of Columbia



Adjunct Assistant Professor at the UNC School of Law, where he taught the Law of Nonprofit Organizations.

Prior to attending law school, Mr. Chaney worked for ten years in the nonprofit sector, serving as a program director, executive director, board member, and board chair with a number of tax-exempt organizations.

Mr. Chaney lives with his wife, Mandy Hitchcock, and their children in Carrboro, and enjoys photography in his spare time.

Professional Activities

Adjunct Assistant Professor of Law, University of North Carolina School of Law (Law of Nonprofit Organizations), 2015

North Carolina Bar Association, Business Law Section, Council member

American Bar Association, Business Law Section, Non-Profit Organizations Committee

American Bar Association, Taxation Section, Exempt Organizations Committee

Awards and Publications

Presenter: The Risks and Rewards of Social Media, Annual Nonprofit Organization's Institute, University of Texas School of Law CLE, January 19, 2018

Presenter: Trends and Developments for Exempt Organizations, 16th Annual North Carolina/South Carolina/Georgia Tax Section Workshops, May 27, 2017

Program Planner and Presenter: So You've Joined the Board - Now What? Nonprofit Governance for Lawyers CLE, North Carolina Bar Association Foundation, February 10, 2017

Presenter: The Public Charity Life Cycle - A Compliance Overview, Annual Nonprofit Organization's Institute, University of Texas School of Law CLE, January 12, 2017

Presenter: The Nonprofit Life Cycle, 2016 NCACPA Not-for-Profit Accounting Conference, May 24, 2016

Co-Presenter: Difficult Public Support Test Issues, ABA Section of Taxation, Exempt Organizations Committee Meeting, January 29, 2016

Presenter: Private Foundation Relationships with Businesses and Family Offices, 33rd Annual Nonprofit Organizations Institute, University of Texas School of Law CLE, January 14, 2016

Author: Commerciality, Charter School of Management Organizations, and Social Enterprise, Taxation of Exempts, Volume 27/Issue 5 Copyright © 2016 Thomson/RIA

Co-Author: Getting Public Charity Status Right Before It Goes Wrong, Taxation of Exempts, Volume 27/Issue 2 Copyright © 2015 Thomson/RIA



Co-Presenter: Complex Public Support Issues, 32nd Annual Representing and Managing TaxExempt Organizations, Georgetown University Law Center Continuing Legal Education, April 24, 2015

Presenter: Considerations for Attorneys Sitting on Nonprofit Boards of Directors, 2015 Business Law and International Law and Practice Sections Joint Annual Meeting, North Carolina Bar Association, February 20, 2015

Co-Presenter: Executive Compensation, Related Party Transactions and Intermediate Sanctions, 32nd Annual Nonprofit Organizations Institute, University of Texas School of Law CLE, January 16, 2015

Presenter: UBIT 101, 2015 Nonprofit Organizations Primer, University of Texas School of Law CLE, January 14, 2015

Co-Presenter: The IRS, CMO's and 501(c)(3) Status - What Is Going On? Alliance of Public Charter School Attorneys Spring 2014 Legal Seminar, April 25, 2014

Keynote Speech: Social Enterprise: Trends, Challenges & Resources, North Carolina Community Development Initiative Innovation Fund Meeting, January 29, 2013

Co-Presenter: Practical Problems and Practical Solutions for Donor Advised Funds, American Bar Association, Tax Section Exempt Organizations Committee Meeting, February 17, 2012