



John G. Hodnette

Partner

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John works as tax attorney with Fox Rothschild's national tax practice to ensure clients reach their goals in the most advantageous and tax-efficient manner possible.

His tax law proficiency allows him to advise clients on all aspects of business taxation, including structuring merger and acquisition transactions; resolving partnership, S corporation and C corporation tax issues; and researching complex income taxation matters. John has experience in the legal challenges that arise throughout the entire life cycle of businesses, from formation to operation, succession planning and exits. He also has drafted and negotiated complex business documents such as asset purchase agreements for companies and individuals, as well as drafted estate plans that help maximize tax benefits for high-net-worth individuals.

Additionally, John represents clients before the IRS and the North Carolina Department of Revenue to settle tax debts and resolve tax audits, collection matters and other tax controversy.

Services

- Taxation & Wealth Planning
- Business Taxation
- Corporate
- Transactional Risk
- Family Offices

Before Fox Rothschild

Prior to joining Fox Rothschild, John was special counsel at a Charlotte law firm. Before that, he practiced at a boutique law firm in Charlotte and was previously an M&A tax associate at KPMG.

John earned the Book Award in International Taxation while earning his LL.M. in taxation, and also served as a student editor of the *Florida Tax Review*. While attending law school, he was a staff member of the *Wake Forest Journal of Business & Intellectual Property Law* and earned the CALI award in Mergers & Acquisitions and Partnership Taxation.

Beyond Fox Rothschild

John contributes to the North Carolina Bar Association Tax Section Blog.

Bar Admissions

- North Carolina

Education

- University of Florida, Levin College of Law (LL.M. in Taxation, 2016)
- Wake Forest University School of Law (J.D., 2015)
- Auburn University (B.A., *summa cum laude*, 2012)

Memberships

- American Bar Association
- North Carolina Bar Association
- Mecklenburg Bar Association

Honors & Awards

- Selected to the "Ones to Watch" list for Corporate Law, Mergers & Acquisitions Law and Tax Law in Charlotte, NC by *Best Lawyers* (2024-2026)

Publications

April 8, 2026

Section 453 Trap for S Corporation Asset Sales

North Carolina Bar Blog

February 16, 2026

Basics of 338(h)(10) Elections

North Carolina Bar Blog

January 13, 2026

Exclusions to the Net Investment Income Tax

North Carolina Bar Blog

January 5, 2026

Installment Sale Notes Owned by S Corporations

North Carolina Bar Blog

November 21, 2025

Unreimbursed Expenses of Employees and Partners

North Carolina Bar Blog

October 7, 2025

Publicly Traded Partnerships

North Carolina Bar Blog

September 15, 2025

What is a QSub?

North Carolina Bar Blog

September 12, 2025

Tax Court: Cannabis Business Wages Ineligible for Qualified Business Income Deductions

August 13, 2025

Expanded Benefits for Qualified Small Business Stock Under the OBBB

North Carolina Bar Blog

July 10, 2025

Classification of LLCs Under the Check-the-Box Regulations

North Carolina Bar Blog

June 12, 2025

Disallowance of Deductions or Credits Under Section 269

North Carolina Bar Blog

May 19, 2025

Carried Interest Holding Period Under Section 1061

North Carolina Bar Blog

April 7, 2025

Meaningless Gesture Doctrine Under Section 351

North Carolina Bar Blog

March 13, 2025

Potential Gain Due to Assumption of Liabilities by Corporation

North Carolina Bar Blog

February 18, 2025

Eligible S Corporation Shareholders

North Carolina Bar Blog

February 13, 2025

Trump May Revive Effort to Close Carried Interest Loophole

January 17, 2025

Disallowance of Deduction of Fines and Penalties Versus Restitution

North Carolina Bar Blog

December 5, 2024

Equitable Recoupment

North Carolina Bar Blog

November 8, 2024

Forfeiture of Unvested Profits Interests

North Carolina Bar Blog

October 10, 2024

Assignment of Income Doctrine

North Carolina Bar Blog

September 17, 2024

Basics of Section 409A

North Carolina Bar Blog

August 12, 2024

Taxation of Cooperatives Under Subchapter T

North Carolina Bar Blog

July 12, 2024

Section 351

North Carolina Bar Blog

June 20, 2024

Section 754 Elections

North Carolina Bar Blog

June 20, 2024

Equity Compensation in LLC Startups: A Guide to Profits Interests

May 14, 2024

Transfers of Property Between Divorcing Spouses

North Carolina Bar Blog

April 16, 2024

Claim of Right Doctrine of Section 1341

North Carolina Bar Blog

March 13, 2024

Partnership Representatives

North Carolina Bar Blog

February 20, 2024

Allocation of Income When a Partner Leaves a Partnership

North Carolina Bar Blog

January 11, 2024

Deemed Asset Sales Under Rev. Rul. 99-5

North Carolina Bar Blog

December 14, 2023

Tax Benefit Rule

North Carolina Bar Blog

November 7, 2023

How Are Restricted Stock Units Taxed?

North Carolina Bar Blog

October 16, 2023

Recharacterizing Gain on the Sale of Depreciable Property Between Related Parties

North Carolina Bar Blog

September 21, 2023

Changes to R&D Deductions and Credits

North Carolina Bar Blog

August 14, 2023

Timing of Deductions Under Section 461

North Carolina Bar Blog