

## CLE PROFILE

# Celia Roady

Celia Roady (LL.M.'79) calls herself a "lifer" — and after speaking at all 24 of Georgetown Law's Continuing Legal Education's annual "Representing and Managing Tax-Exempt Organizations" programs, she's earned the right to. Roady, now a program co-chair, is grateful that she's also become a "lifer" in the tax-exempt field, devoting all of her professional time to representing tax-exempt organizations.

It's a rare treat. A partner at Morgan, Lewis & Bockius in Washington, D.C., Roady has a team of five lawyers doing tax-exempt work with her. In such a specialized field, that's a fairly large group, she says.

Starting out in the law, Roady knew she wanted to do tax work, and she worked on a variety of tax matters. "But one of the first clients that I did a lot of work for was a major private foundation," she says. "And they had such interesting issues. I really enjoyed the work that I did in that area and I just began to gravitate to that area."

After practicing for about 10 years, Roady was able to devote herself full-time to tax-exempt work. She wouldn't have it any other way. "I think it's just the best," she says. "You get to do a lot of creative tax work in an area that has some discernable social impact." "It's really an opportunity to use the tax laws creatively to try to help tax-exempt organizations accomplish their missions."

Recently, she's worked with private foundation clients making investments in Africa that will bring banking services to areas where there aren't any. It's an example of how her work — even in a small way — can make a positive contribution.

"In parts of Africa," she says, "if you want to keep your money safely, there's no bank that you can go to. You have to pay people to keep your money safely for you." And where there are no banks, there are no legitimate loans, she adds. "If you wanted to borrow \$50 to buy a sewing machine so that you could buy a small business to support your family, there's no place to go, except informal money lenders who charge very high rates of interest."

Although her clients have clear goals, figuring out the legalities of how to obtain them is not always so easy, Roady says. The creative part of her work lies in figuring out how best her clients can proceed when there's no clear direction. "There are a lot of areas in tax-exempt organizations where there's just not a bright line out there that says, 'This is OK, and this is not OK,'" she says. "So I think one of the biggest challenges is ... to try to come up with what the right answer should be in different cases where there's no case or ruling or regulation you can find that tells you this is OK."

One of those gray areas is how much executives leading tax-exempt organizations can be compensated. It's been a growing concern since Congress passed a law about



10 years ago that prevents organizations receiving federal funding from paying executives too much. "Understanding how these rules work and how to establish that the compensation is reasonable — and when it goes over the line and becomes excessive — is really an art and not a science," Roady says.

The chance to hear viewpoints on this issue and other hot topics in the tax-exempt field — such as how to prepare for and handle audits in an age of stepped-up IRS enforcement efforts — is what makes the Representing and Managing Tax-Exempt Organizations program so valuable, Roady says. She and other planners try to anticipate what lawyers doing tax-exempt work will want to hear about and organize panel discussions, breakout sessions and more around those issues.

The program, which takes place in April each year, always features key government officials representing the IRS, the Treasury Department, congressional committees and other bodies whose policy decisions affect the tax-exempt field. It's a hallmark of the program that attendees anticipate each year, Roady says. "Our job is to deliver a CLE that fits their needs. So in a sense, it's really their program."

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