



Taxation

We have a broad practice involving federal income, gift, estate and excise tax issues, international tax issues and issues related to state and local income, property and sales and use taxes and other licenses and fees. Our focus includes:

- Tax Issues related to Investment Advisers
- Federal and State Tax Disputes
- Planning for Business Transactions
- State and Local Compliance
- International Investors
- Real Estate Transactions
- Estate and Gift Taxes

We have extensive expertise in federal and state income tax issues involved with investment advisers, securities investment pools and [venture capital funds](#), and work closely with our [Investment Funds & Advisers Group](#) on those issues. We counsel investment advisory clients on the formation, operation, reorganization and dissolution of management companies, investment pools and venture funds, taxation of complex financial transactions, tax aspects of the advisor's compensation arrangements and complex partnership accounting and allocation issues.

We also have extensive expertise in federal, state and local income, property and transfer tax issues tax issues involved with real estate transactions and work closely with our Real Estate Group on those issues, including acquisition and disposition of real property, foreign investment in U.S. real property, like kind exchanges, joint ventures and real estate funds. We advise frequently on California property tax issues, including reassessment of real property due to changes of the ownership structure.

Along with advising California-based clients regarding state and local taxes, we represent clients on California's jurisdiction over out-of-state individuals and companies with business connections to California and the effect of the state's far-reaching unitary system of income taxation.

In representing clients in international business transactions, we counsel on the federal, state and foreign tax consequences of such transactions, including such issues as the proper choice of entities, jurisdictions and transfer pricing in related party transactions. In addition to counseling on the tax issues in proposed business transactions, we represent clients in tax disputes with the Internal Revenue Service and with the California Franchise Tax Board and State Board of Equalization.

We also work closely with the Family Wealth Planning Group on all aspects of estate planning and trust and estate administration and related litigation and maximizing tax efficiency.

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