Taxation

Known for our technical depth and sound judgment, we help businesses, investors and individuals solve complex tax problems in practical ways that support their broader business, legal and financial goals.

Shartsis Friese's taxation attorneys, represent public and private companies, real estate partnerships, investment funds, executives, founders, family offices and tax-exempt organizations. We work closely with our corporate, real estate, family office, and investment funds groups to structure deals, manage exposure across jurisdictions and develop strategies that align with each client's long-term objectives. We also work closely with our Family Wealth Planning group to advise individuals and families with complex assets or cross-border considerations.

With a sophisticated tax controversy practice, we regularly obtain favorable results for clients in complex state and federal audits, appeals, and tax court litigation. Our team has particular experience in emerging areas, such as cryptocurrency audits and the taxation of digital assets, in which we routinely advise clients on the audit implications of decentralized finance protocols and transactions.

The team's combined prior in-house, big law and government experience, allows us to bring a variety of perspectives to every tax issue.

Company Formations and M&A

- Represent private and public companies, as well as private equity sponsors, in structuring tax-free and taxable mergers, acquisitions and re-organizations.

RELATED ATTORNEYS

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- Represent startup companies on choice of entity, QSBS issues, and equity compensation to optimize tax results for founders, employees and investors.

Private Investment Funds

- Advise on tax structuring for private equity, hedge and venture capital funds to address GP and LP investment tax objectives.
- Advise on all aspects of the business for asset managers, including succession and liquidity planning.
- Tax-exempt organization planning, investments, governance and compliance.
- International tax planning for inbound and outbound investments.
- State and local tax planning, including California and San Francisco-specific issues.

Real Estate Joint Ventures and Partnerships

- Represent capital partners and developers in office, retail, hotel, winery, vineyard and mixed-use projects across the country.

Individual, Executive and Family Office Tax Planning

- Tax planning for founders, family offices and high-net-worth individuals.
- Executive compensation and equity incentive planning.
- International tax planning for inbound and outbound investments.

Tax Controversy

- Represent clients in complex state and federal audits, appeals, and tax court litigation.

Whether advising on a transaction, navigating federal and state tax compliance, or handling a dispute, we approach each matter with tactical precision for the technical rules and nuanced application within the business context. When needed, we collaborate with colleagues across Corporate, Investment Funds, Litigation and Real Estate to deliver fully integrated advice.

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