Hanson Bridgett Practice Group
Tax

Hanson Bridgett's tax attorneys provide a broad spectrum of federal, state and local tax-related services to diverse clients, ranging from personal and transactional tax planning to tax controversy matters (e.g., audits, appeals, compromise offers, and litigation). Our clients include individuals, families, partnerships, limited liability companies, C corporations, S corporations, governmental agencies, and nonprofit organizations.

Our tax attorneys regularly conduct webinars and other seminars for practitioners on various tax issues, including compensation and benefits, employment tax and foreign account and entity compliance. We also publish widely in various tax journals, speak to client and professional conferences about current issues, and are quoted in the mainstream media on current tax matters.

Areas of Expertise

Corporate Tax
Our attorneys regularly advise corporations and their shareholders on a wide variety of planning issues. We provide comprehensive tax advice from early formation issues (including compensatory stock and grants), though all phases of corporate development, to tax issues related to public-offerings. We advise on the special issues affecting S corporations and their shareholders.

Employee Benefits
We advise publicly traded and privately held employers as well as non-profits and governments

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on tax and compensation issues involving compensation and benefits. We routinely advise individuals regarding beneficiary designations, benefit distributions, IRA rollovers, income and estate tax elections, and the related planning opportunities. We also have specific expertise in all types of qualified and non-qualified retirement plans, employee benefits issues that arise in business transactions, executive and equity compensation issues, fiduciary responsibility, welfare plan issues, tax planning and IRS audits involving benefit plan issues for all types of business and governmental entities. We regularly deal with the IRS and Treasury on compensation and benefits issues. Moreover, we are registered as lobbyists with the U.S. Congress and have assisted clients in their endeavors on the Hill.

Health Reform
Our experience in health benefits tax issues is unusual among law firms because many of our lawyers have actual experience running major health programs or advising on their implementation. This experience translates into practical advice on how to deal with health reform's tax issues such as "pay or play".

Employment Tax
We provide advice on a wide variety of employment tax issues, including payroll taxes, employee vs. independent contractor controversies, and federal and state employment tax audits. Our attorneys have unique experience with employment tax issues, including audits, affecting state and local entities throughout California.

Estate, Gift and GST Tax
We provide expert and comprehensive advice to individuals and families in connection with their gift tax, estate tax and GST (generation-skipping transfer) tax planning. We deliver innovative approaches to help our clients meet their planning needs in a manner tailored to each individual or family group. The current economic environment of reduced valuations and low interest rates, the dramatic increase in the gift tax exclusion amount to $5.25 million per person, and the lack of Congressional action to eliminate either intra-family discounting or the benefits of "intentionally defective grantor Trusts" ("IDGTs") offer significant transfer tax planning opportunities through techniques such as: gifts and sales of interests in assets that can be discounted (e.g., minority business interests or undivided interests in real property) to IDGTs; grantor retained annuity trusts("GRATs"); charitable lead annuity trusts ("CLATs"); AFR intra-family loans; "financed net gifts" to IDGTs; and other techniques.

General Federal Tax
Our attorneys provide federal tax planning advice for individuals, business entities and governmental/non-profit entities. Our practice group can respond with individualized attention and specific expertise to a wide variety of federal income tax matters. We publish widely on issues affecting shareholders, including Section 83 and qualified small business stock.

International Tax
We provide outbound and inbound tax advice for U.S. and foreign individuals and entities. Our

attorneys have specific expertise in cross-border issues affecting taxpayers in the Pacific rim and regularly negotiate favorable resolutions for individuals and entities under the IRS's voluntary disclosure program.

Mergers & Acquisitions
Our attorneys possess specific expertise in reorganization issues and have guided many small and midsize corporations through corporate reorganizations, both taxable and non-taxable. We also provide tax advice on partnership and limited liability company mergers and reorganizations as well as mixed entity reorganizations.

Litigation
We routinely represent individuals and various business entities in controversy manners before the IRS, state, and local authorities. Our tax attorneys have reached favorable resolutions and reduced proposed IRS assessments both at the examination stage and before the IRS Appeals Office. We also have successfully defended pension and retiree health care class action cases involving hundreds of millions of dollars and thousands of employees.

Nonprofit and Tax-Exempt Entities
We advise tax-exempt organizations on formation and compliance issues. Our attorneys routinely obtain federal and state exemption letters for our clients and provide guidance on maintaining tax-exempt status and avoiding private foundation penalty taxes. We also provide guidance on tax-exempt bond financing. Our ability to provide advice to universities and colleges is especially strong, again because of the experience of our lawyers.

Partnership Tax
Our attorneys advise on all aspects of partnership taxation, as well as sales and purchases of partnership interests and assets.

Real Estate Tax
We regularly advise on tax-free exchanges under Section 1031 as well as Proposition 13 reassessment rules and local real property transfer taxes.

Cooperative Corporations
We provide comprehensive advice regarding the federal and state taxation of cooperatives and their members, particularly farmer cooperatives, including so-called exempt farmer cooperatives. We are especially skilled in the drafting of cooperative bylaws critical to compliance with the requirements to preserve single tax treatment of patronage sourced income of cooperatives and their members. We have participated extensively and taken leadership responsibilities in industry organizations dealing with cooperative matters, including cooperative taxation.

State and Local Tax
We provide planning advice for taxpayers on a wide variety of state and local tax matters. We have obtained favorable rulings from the State Board of Equalization on sales and use tax issues. Our attorneys regularly represent clients in contested matters before the Franchise Tax Board and the State Board of Equalization.

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