HansonBridgett

Margaret S. Ng

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Firm Leadership

Finance Committee, Member

Areas of Focus

- Family Wealth Planning
- Tax

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Margaret specializes in family wealth, estate and tax planning with an emphasis on company founders, fund managers and family offices. She helps founders and business owners plan for liquidity and exit events (company sales, IPOs and succession planning) to minimize both capital gains and estate taxes.

For family offices and fund sponsors, Margaret brings almost two decades of experience structuring funds and joint ventures. With this experience she advises clients on wealth transfers and estate tax planning involving venture capital funds, carried interests and real property ventures.

With expertise in estate, partnership and real estate tax law, Margaret builds integrated estate plans that account for clients' business concerns today while preserving wealth generations ahead.

Representative Work

Estate Planning and Administration

Represented families in structuring gift transfers of two-class partnerships with preferred and carried interests (in accordance with IRC Section 2701).

Represented founders and business owners in estate tax and federal and state income tax planning in preparation of company and stock sales (including qualified small business stock tax planning).

Represented founders, business owners, and retirees in connection with California tax domicile exit planning.

Represented families in forming charitable remainder and charitable lead trusts.

Represented U.S. beneficiaries in the buyout of their interests in a billion-dollar estate.

Represented non-resident and cross-border families to structure with wealth transfers for the benefit of U.S. beneficiaries.

Family Office and Fund Formation

Represented various fund sponsors in connection with negotiating and preparing partnership and LLC agreements for operating and investment vehicles.

Restructured family office ownership structure after death of first-generation principal to reduce capital gains on their real estate portfolio.

Acted as lead tax counsel to sponsors of solar energy tax equity partnerships in connection with various capital raises.

Represented family office to structure separation of partners in a manner to avoid a real property tax reassessment.

Advised institutional investors of an agricultural fund on possible unrelated business taxable income and debt-financed income.

Real Estate Tax Matters

Successfully appealed a new construction property tax assessment of a multi-story parking facility, reducing the assessment from $64 million to $35 million.

Represented a majority investor to negotiate tenants-in-common documentation for a $61 million investment in Atlanta, Georgia.

Represented a publicly held multinational company and successfully challenged the reassessment of its Huntington Beach plant arising from a synthetic lease transaction, reversing the reassessed value of $39 million to the original assessed value of $19 million.

Challenged the reassessment of a 93-unit apartment complex in San Diego County arising from a non-pro rata trust distribution, reducing the reassessed value from $21 million to $12.5 million.

Challenged the reassessment of a leasehold interest in Los Angeles County resulting from the recordation of a ground sublease assignment, reversing the reassessed value of $24.6 million to the original assessed value of $7.9 million.

Advised client on the tax implications of the condemnation of a $52 million high-rise office building in connection with the Los Angeles County purple line subway extension.

Publications

"The Freeze Partnership: An Estate Tax Technique For Real Estate and Other Appreciated or Leveraged Assets," Family Wealth Planning Alert (August 2021)

Presentations

"5 Mistakes to Avoid When Selling Your Business," Webinar (June 2024)

Press

"So Long, Step-up Rule?," *Barron's Magazine* (September 2021)

Professional Affiliations

State Bar of California, Tax and Trust & Estate Section, Member

State Bar of New York, Member

ProVisors – Mergers & Acquisition and Capital Formation Affinity Group, Member

Association of Corporate Growth, Member

Academic Distinctions

North Carolina Banking Institute Journal, Articles Notes Editor

Education

LL.M., New York University School of Law (2006)

J.D., University of North Carolina School of Law (2005)

B.A., Duke University (2001)

Admissions and Courts

California

New York