

# Tax Law

Our tax attorneys are committed to helping clients proactively structure their businesses, transactions, and estate plans in the most tax-efficient manner.

Taxes are a significant expense for any business and most individuals, and tax planning should not be an afterthought. By strategically addressing tax issues, our experienced lawyers can partner with companies and individuals to identify techniques that will minimize tax liabilities. Our tax practice group offers a team with extensive experience who can help individuals and your business optimize its financial health.

## LEADERSHIP



TAX LAW

BUSINESS & FINANCE

**Belan K. Wagner**  
Co-Chair

**Sacramento**  
PH 916.920.5286  
FX 916.920.5286  
[bwagner@fennemore.com](mailto:bwagner@fennemore.com)  
[aw.com](http://aw.com)



TAX LAW

BUSINESS & FINANCE

**Stephen A. Good**  
Co-Chair

**Phoenix**  
PH 602.916.5395  
FX 602.916.5595  
[sgood@fennemorelaw.com](mailto:sgood@fennemorelaw.com)  
[w.com](http://w.com)

## OUR EXPERIENCE

Our team of tax attorneys works on sophisticated tax matters for clients in an efficient, proactive manner. The group frequently works alongside outside advisors such as accountants, financial planners, as well as other groups within the firm to offer clients comprehensive tax planning services.

Our experienced professionals include attorneys that have completed both a professional law education earning their Juris Doctor (J.D.) as well as an additional Master of Laws in Taxation program (Tax LLM) or other advanced tax degree such as an MS in Taxation. Additionally, we have attorneys that are also Certified Public Accountants (CPAs) and thus able to skillfully advise businesses and tax preparers. Other credentials and memberships include, present and historically: adjunct professors; authors, lecturers, and presenters at national tax conferences; Chairs of the State Bar of California Executive Committee of the Taxation Section; CalCPA Real Estate Committee Chair; American College of Trusts and Estates Counsel Fellow (ACTEC) on Tax

Policy, Business Law and Membership Committees; and Chair of the Internal Revenue Service Sacramento District Practitioners Liaison Committee.

## **PLANNING**

In the planning stages, the group counsels both individual and business entity clients regarding issues related to income taxes, sales and use taxes, employment taxes, and property taxes. Additionally, our attorneys are well-versed in estate and gift taxation, tax-deferred exchanges of real property, entity restructuring, and non-profit entity formation, charitable and other tax planning.

## **CONTROVERSY**

The Tax Practice Group is ready to represent and has successfully defended clients in complex audits and collection proceedings involving the IRS, the Franchise Tax Board, the State Board of Equalization, the Employment Development Department and County Tax Assessors, and boards or commissions. Our tax professionals regularly litigate tax controversy cases with the U.S. Tax Court, Federal District Court, and California Office of Tax Appeals (OTA) with successful outcomes either eliminating or significantly reducing our clients tax liability.

Tax attorneys can also help clients navigate disputes with the IRS, the Arizona Department of Revenue, the Nevada Department of Taxation, the Colorado Department of Revenue, the California Department of Tax and Fee Administration (CDTFA) or other taxing agencies.

## **CLIENTS**

Our client base is as varied as our specializations and includes:

- entrepreneurs just starting out and designing their entity structure, positioning for future growth and impact as well as minimizing future tax liabilities
- existing businesses seeking to implement creative benefit and compensation plans to attract, retrain, and reward employees and achieve operating efficiencies including pass-through entity tax elections
- mature enterprises or business owners looking to sell or transition to the next generation
  - including restructuring where needed to minimize income taxes in the future or to better position a company for a future liquidity or transition event
- investors seeking to maximize after-tax returns
- high-net-worth individuals and families desiring to minimize gift and estate taxes

We welcome the opportunity to talk to you about the tax planning strategies available to help you achieve your objectives.