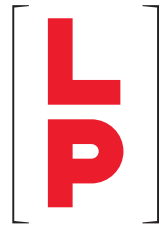


Tax Planning

Bringing creativity, intellect, and pragmatism to the full range of tax matters.



Levenfeld
Pearlstein

Tax has always been and continues to be at the core of LP's client service, with tax structuring as the driver of many of the firm's most notable transactions. Tax considerations are not an afterthought but are an integral part of the work that is performed by LP's corporate and real estate attorneys.

LP's tax attorneys are fully embedded into the firm's transactional teams, facilitating a seamless integration of both commercial and tax objectives from the start.

LP's tax strategies are vetted for acceptance by lenders and other counterparties; complex tax considerations are framed in a manner that is palatable to clients.

Our focus is on a wide range of transactional tax planning and structuring. We have significant experience in all aspects of federal and state taxation, representing public and privately held companies, REITs, pass-through entities, fund sponsors, tax-exempt entities, real estate ventures, start-up ventures, entrepreneurs, and corporate executives. Our tax attorneys are nationally recognized for their creativity, intellect, and pragmatism.

TRANSACTIONAL TAX

Our attorneys practice "transactional tax"—an approach that places the business transaction at the front and center of the structuring objectives. We focus on tax-efficient structures and problem solving for corporate mergers and acquisitions, private equity, venture capital, real estate transactions, tax-free exchanges, joint ventures, intellectual property licensing, asset protection, business succession, and other business relationships. Our tax attorneys are experienced transactional attorneys who have honed their skills by implementing structures and closing deals.



STATE AND LOCAL TAXATION (SALT)

Our attorneys recognize that transactional planning and structuring does not stop with federal income tax issues. We routinely advise clients on all aspects of multi-state taxation, including nexus issues, income apportionment, sales and use tax, franchise tax, unclaimed property, payroll tax, and state registration and reporting requirements. We have particular experience in the planning and structuring of aircraft and other rolling stock transactions. In addition, we routinely represent taxpayers who are the subject of a state or local tax audit, are appealing a proposed assessment, or are seeking to voluntarily disclose a liability with one or more jurisdictions.

TAX CONTROVERSY

We routinely defend large and complex audits at all stages of the audit and appeal process, and have significant experience in representing taxpayers in the Tax Court, before the Internal Revenue Service Appeals Division, state court administrative proceedings, and numerous state and local tax agencies across the country. Our representation includes audit defense, appealing and negotiating proposed assessments, tax litigation, negotiating, and entering into voluntary disclosure agreements and obtaining federal and state private letter rulings. We also routinely work with accountants and attorneys nationwide to assist with tax disputes that require additional knowledge.

INTERNATIONAL TAXATION

We often design and implement legitimate tax reduction strategies for individuals and families by using leveraging techniques, such as dynasty trusts, intra-family sale agreements, family limited partnerships, grantor retained annuity trusts, qualified personal residence trusts, self-cancelling installment notes, private annuities, and college savings plans, and maximizing estate, gift, and generation-skipping tax exemptions.

1031 – LIKE-KIND EXCHANGES

Our Chicago 1031 exchange attorneys structure exchanges in forward, reverse, build-to-suit, mass asset, and auction modes and have developed specialized exchange techniques utilizing synthetic leases, air rights, series limited liability companies, and contract sales. We have handled exchanges involving real estate, aircraft, automobile fleets, transport ships, manufacturing equipment, franchises, FCC licenses, artwork, and collectibles.

We structure Revenue Procedure 2002-22 compliant syndications for tenancy-in-common (TIC) program sponsors. In addition to structuring programs, we write offering memoranda and make securities filings. We have experience in closing TIC transactions with CMBS/secured financing—the members of the Exchange Services Group include our best real estate and finance attorneys who regularly buy, finance, and sell exchangeable assets.

Connect with our Tax Planning Group. We know that managing the cost of taxes in a proper way is an essential part of business structuring and legal representation. Let's find out what we can achieve together.

CONTACT US