



H. JACOB LAGER

Partner

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Office: Century City

PRACTICE AREAS

**Business Transactions and Tax
Tax Planning, Advice and Controversy**

EDUCATION

J.D., University of Pennsylvania Law
School B.A., University of California at
Berkeley

ADMITTED TO PRACTICE

California
U.S. District Court for the Central
District of California
U.S. Court of Appeals for the Ninth
Circuit
U.S. Tax Court

H. Jacob Lager is Chairman of the Business Transactions and Tax Department. His practice is concentrated in domestic tax, international taxation, and trust and estate matters.

» **Extensive experience in domestic tax matters**

Mr. Lager possesses extensive experience in the structuring of business transactions, and advising domestic and cross-border clients on tax implications related to corporate mergers, asset acquisitions, spin-offs, and debt exchanges. He routinely drafts information disclosures for proxy statements, public filings, and private offerings. Mr. Lager also advises clients regarding the inception and maintenance of special status entities such as S corporations, disregarded limited liability companies, partnerships, REITS, and tax-exempt charitable organizations. He has advocated for clients at all levels of tax dispute resolution. Mr. Lager also has been involved with the tax implications of corporate dissolutions, partnership and corporate redemptions and reorganizations, mergers, buy-outs, transition agreements, succession planning and other capital events that often result from the resolution of co-owner disputes.

» **International practice**

Mr. Lager has developed specific experience in tax implications of cross-border matters, which often encompasses the U.S. treatment of domestically held foreign interests. He counsels clients on Tax Treaty benefits and corresponding withholding obligations related to international loan agreements, royalty arrangements and dividend payments. Mr. Lager frequently assists non-U.S. clients in making tax-efficient investments within a variety of U.S.-based companies.

» **Trust and estate planning**

In addition, Mr. Lager provides estate planning services to high net-worth individuals related to estate taxation, generation-skipping taxation, fiduciary income tax, and post-mortem tax and succession planning. He has experience in probate and private trust administration, from living trusts to more involved GRATs, QPRTs, family limited partnerships and LLCs, ILITs, charitable trusts, and other manners of deferred giving. He also advises his foreign clients who want to make cross-generational gifts to U.S. heirs.

» **Property tax matters**

Well-versed in California property tax matters, Mr. Lager regularly contests reassessments and engages in entity structuring to avoid such reassessments, where possible. Every property tax situation can be complex and unique and his focus is on providing advice and solutions tailored to each client's individual needs.

» **Honors**

Mr. Lager has been selected by his peers for inclusion in the 2019-2021 editions of Best Lawyers in America® in the field of Trusts and Estates. From 2020-2021, Mr. Lager has been named to the Southern California Super Lawyers list, a designation bestowed on only the top 5% of lawyers in this region.

Representative Clients and Matters

» Defended a foreign professional athlete against an asserted tax determination based on alleged in-state residency.

» Navigated tax treaty networks to structure a multi-national licensor of software across three continents and a dozen countries.

- » Defended a large family trust against a transferee liability assessment for estate taxes due from a related estate.
- » Guided “accidental” US citizens and other inadvertent delinquent FBAR filers through IRS compliance procedures, including the Service’s OVDP and Streamlined processes.

Professional & Community Involvement

- » Los Angeles County Bar Association
- » Bet Tzedek New Leadership Council | Chair | 2008 - 2011

Presentations & Publications

- » Learn How the Tax Cuts and Jobs Act Affects You | March 1, 2018
- » Transaction Privacy Eroding: New California Documentary Transfer Tax Provision Eliminates Separate Unrecorded Statements | Real Property Law Section E-Bulletin | November 6, 2014
- » Tax Sans Frontieres – an International Tax Law Blog “Tax Sans Frontieres – an International Tax Law Blog” | August 6, 2014

Media Coverage

- » H. Jacob Lager Quoted in Law360 Regarding the Supreme Court’s Ruling on Maryland’s Taxing Power | May 2015