

Tax

The Tax practice at Cairncross & Hempelmann works in close conjunction with our other practice areas. We represent enterprises and individuals in a comprehensive array of tax services.

Our Philosophy

The economics of business transactions often depend upon the tax consequences. Our attorneys provide creative, expert, and responsive tax advice to our clients, helping them to avoid tax problems and to take advantage of opportunities. We focus on solutions, not impediments, and, when necessary, serve clients as vigorous advocates in tax controversies.

Representative Transactions*

Developing a program to allow real estate investors to exchange their properties for undivided interests in larger projects

- Minimizing the impact of Washington state taxes on several business acquisitions
- Negotiating favorable outcomes for companies in disputes with the Internal Revenue Service and with the State of Washington
- Obtaining favorable rulings from the Washington Department of Revenue validating creative joint venture approaches
- Recapitalizing a company to enable the directors to offer equity to key managers at a minimal tax valuation
- Modifying operating agreements to effectively shift tax benefits among members

*Due to the sensitive nature of our tax practice, we do not include client names in the above-referenced list of experiences.

Areas of Emphasis

We focus on solutions, not impediments, to:

- Selecting the optimal form and location for business enterprises
- Structuring compensation programs to attract and retain key personnel
- Minimizing the tax cost of international transfers of intellectual and tangible property

- Developing creative strategies for mergers and acquisitions, using tax benefits to improve deal economics
- Helping real estate developers find new sources of capital using innovative tax strategies
- Representing enterprises and individuals in disputes with the Internal Revenue Service and with state taxing authorities

Representative Matters

Attorneys in the Tax group have represented clients in the following transactions:

- Developing a program to allow real estate investors to exchange their properties for undivided interests in larger projects
- Minimizing the impact of Washington state taxes on several business acquisitions
- Negotiating favorable outcomes for companies in disputes with the Internal Revenue Service and with the State of Washington
- Obtaining favorable rulings from the Washington Department of Revenue validating creative joint venture approaches
- Recapitalizing a company to enable the directors to offer equity to key managers at a minimal tax valuation
- Modifying operating agreements to effectively shift tax benefits among members
- Selecting the optimal form and location for business enterprises
- Structuring compensation programs to attract and retain key personnel
- Minimizing the tax cost of international transfers of intellectual and tangible property