

H. Jacob Lager

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Jacob Lager is the chair of the Tax practice group. He advises privately held businesses, individuals, and trusts on a variety of domestic and international taxation matters.

Jacob structures business transactions and advises domestic and cross-border clients on tax implications related to real estate joint ventures, like-kind exchanges, corporate mergers, asset acquisitions, spin-offs, and debt exchanges. Jacob advises clients on the creation and operations of tax-preferred entities such as partnerships, S corporations, disregarded limited liability companies, REITS, and tax-exempt charitable organizations. He advises on the tax consequences of capital events and exits, including corporate dissolutions, partnership and corporate redemptions and reorganizations, asset purchases, mergers, buy-outs, transition agreements, and intrafamily succession planning.

Jacob also maintains an active tax controversy practice, advising clients at all stages of federal, state, and local tax audits, appeals, and court actions. Jacob regularly defends clients in income tax disputes with the Internal Revenue Service and the Franchise Tax Board, employment tax disputes with the Employment Development Department, sales and use tax disputes with the Department of Tax and Fee Administration, and property and transfer tax matters with county assessors throughout California.

In addition to his significant domestic tax experience, Jacob also advises clients on cross-border tax matters, including the U.S. treatment of domestically held foreign interests. He advises clients on tax withholding obligations related to inbound and outbound transfers and how applicable Tax Treaties mitigate such tax results. Jacob also advises non-U.S. clients in making tax-efficient U.S. investments.

Jacob also supports the firm's estate planning department, advising high net-worth families related to estate and generation-skipping taxation, fiduciary income tax obligations, and post-mortem tax planning. He provides guidance relating to the income tax obligations of various trust structures, including simple living trusts and extending to sophisticated GRATs, QPRTs, ILITs, charitable trusts, and other manners of deferred giving.

Jacob earned his J.D. from the University of Pennsylvania School of Law in 1998. He received his B.A. from the University of California, Berkeley in 1995.

Honors & Awards

Jacob is recognized as a leading Tax and Trusts and Estates lawyer by *The Best Lawyers in America*® (2019-present) and is recognized in the Lawdragon 500 Leading Global Tax Lawyers guide. He is also recognized by Super Lawyers in the Tax Law category (2020-present).

Education

- J.D., University of Pennsylvania Law School (1998)
- B.A., University of California, Berkeley (1995)