
Jeffry A. Bernstein

Partner

San Francisco

Details

T 415.772.5716

F 415.989.1663

jbernstein@coblentzlaw.com



Jeffry Bernstein is one of the most well-known and preeminent tax attorneys in California. Jeffry brings extensive experience and close personal attention to the representation of businesses, individuals and families in highly sophisticated income, estate, and property tax matters, both as an advisor and as an advocate. He has successfully litigated and favorably settled significant income, estate tax, and tax issues before the IRS and the California Franchise Tax Board, as well as real property tax assessment appeals.

Jeffry's practice emphasizes structuring and planning for limited liability companies and partnerships involved in complex real estate acquisitions and commercial and residential development projects to maximize the tax and economic benefits to investors. He also advises Subchapter S and Subchapter C corporations on tax issues involving structuring corporate acquisitions and mergers in a tax efficient manner.

He advises foreign clients on inbound investments in the United States and FATCA. He also represents U.S. persons residing outside the U.S. who want to participate in the IRS Voluntary Disclosure / Amnesty Program to bring them into compliance with their U.S. tax reporting obligations.

Because of his extensive experience and broad background in partnership, corporate, trusts and estate and wealth transfer matters, he has a unique ability to integrate the different aspects of tax planning involving overlapping tax areas to provide, in a clear and concise manner, comprehensive advice on tax issues and ownership succession to closely held businesses.

Jeffry earned his bachelor's degree in accounting with honors from Queens College (1967). He earned both his law degree and his Master of Laws in Taxation in 1971 and 1975, respectively, from New York University School of Law, where he served as an editor of the New York University Law Review.

Notable Representations

Real Estate

Advised real estate developers on structuring commercial and residential developments and restructured a group of real estate development companies with new private equity investors in the aggregate value in excess of \$300 million. Currently representing a major real estate developer in contesting an IRS disallowance of large conservation easement contribution.

Trust Litigation

Represented a trustee (and Executor) in trust administration and litigation matters involving a dispute with family members over the distribution of a deceased family member's large real estate portfolio and bequests.

Property Tax Appeals

Represented Neiman Marcus in a property tax assessment appeal with the San Francisco Assessor having achieved significant reductions in California real property taxes for their flagship Union Square Store. Currently handling property tax appeals for a major Bay Area sports franchise and other commercial properties.

Honors & Awards

Jeffry has been listed in The Best Lawyers in America in Litigation & Controversy-Tax and Tax Law for over 20 years. The California State Bar Tax Section honored Jeffry with the Joanne Garvey Award for lifetime achievement and contributions in the area of tax. He is also an AV Preeminent Rated Lawyer from Martindale-Hubbell and an annually listed SuperLawyer in Northern California.

Professional Activities

Jeffry is a Fellow of the American College of Tax Counsel. He is a member of the committees on Pass-Through Entities and Partnerships of the American, California and New York State Bar associations and a member of the Western Region Bar Association IRS Liaison Committee. He has lectured extensively on taxation and taught taxation as a visiting professor of law at the University of California, Berkeley School of Law (Boalt Hall). He was also an associate professor at Puget Sound School of Law and an adjunct professor in the Master of Laws Taxation program at Golden Gate University.

Publications & Speaking Engagements

- [“Partnerships and LLCs Need to Revise Their Agreements to Address New Audit Procedures”](#) (February 5, 2019)
[“San Francisco Passes Proposition C to Increase Gross Receipts Tax on Commercial Landlords”](#) (October 1, 2018)
[“California’s Changing Approach to Like-Kind Exchanges”](#) (August 29, 2018)
“Tax Analysts Exclusive, Conversations: Jeffry Bernstein,” by Sam Young, Tax Notes (October 12, 2009)

Education

LL.M., New York University School of Law (1975)

J.D., New York University School of Law (1971)

B.A., with honors Queens College, New York (1967)