

# Wendy Bleiman

## Special Counsel

San Francisco

## Details

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Wendy Bleiman is a tax attorney whose practice focuses on tax controversy, exempt organizations, and estate planning.

Wendy's tax controversy practice includes supervising audits by the Internal Revenue Service, as well as by state and local taxing authorities. She represents clients at IRS Appeals and other administrative-level proceedings, and at Tax Court, with respect to matters including Federal income, estate, gift, and employment taxes, and state and local income, franchise, property (including Prop. 13 reassessment issues) and sales tax matters. As part of her controversy practice, Wendy has obtained private rulings, offers in compromise, and penalty abatements, and has assisted clients to qualify for structured voluntary disclosure, tax amnesty, and similar programs.

A large part of Wendy's exempt organization practice involves working with non-profit organizations to obtain and maintain tax-exempt status. She advises exempt organizations (including private operating and non-operating foundations) with respect to raising, investing, and utilizing charitable assets, including by investing in program-related investments. In her role as counsel to private foundations, Wendy educates and advises such clients about how to navigate the complex private foundation rules. Wendy also advises charitably-motivated individuals and families to structure charitable gifts, including by negotiating and drafting multi-million dollar structured gift agreements, and in planning donations of artwork, real estate, conservation easements, and other special assets. Related to this practice, Wendy also advises clients who wish to take advantage of certain federal and state tax incentives such as conservation easements, historic/rehabilitation tax credits, and energy-related tax incentives.

Wendy also works with clients to achieve their wealth transfer objectives, including by using specialized planning vehicles such as grantor retained annuity trusts (GRATs) and split-interest trusts with a charitable element (such as charitable lead- or remainder- trusts).

Prior to joining Coblentz, Wendy was Of Counsel in the Tax, Trusts & Estates Group at Jeffer Mangels Butler & Mitchell LLP in Los Angeles.

Wendy earned her J.D. from the University of California College of Law, San Francisco (Hastings), and her B.A. in Philosophy from University of California, Berkeley.

## Professional Activities

Wendy is a member of the State Bar of California, Taxation Section and Trusts & Estates Section. She served as an adjunct professor at the San Francisco and Los Angeles branches of Golden Gate University School of Law, in both the LL.M. Tax program and the law school. She taught several classes, including Characterization, Partnership Tax, Tax Procedure and Tax Policy. She managed the LL.M. Tax program in Los Angeles during the last few years of her affiliation with that program.

## Education

- J.D., University of California College of Law, San Francisco (1984)
- B.A., University of California, Berkeley (1976)