

SENIOR COUNSEL

# Steven A. Meyer

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#### **KEY SERVICES**

**Business Counseling** 

**Business Planning and Formation** 

Tax

Trusts & Estates

#### **EDUCATION**

University of Pennsylvania, B.S. in Economics, 1967

Suffolk University Law School, JD, Law Review, 1972

Boston University School of Law, LLM., Taxation, 1978

#### **ADMISSIONS**

Courts of the Commonwealth of Massachusetts

S. Tax Court

#### **MEMBERSHIPS**

Boston Bar Association

American Bar Association

### Overview

Steven is a member of the firm's Corporate Department.

Steven practices in the areas of business law, taxation and domestic and international estate planning. Steven is a commentator on tax issues for the *Boston Globe*, *Business Week* and other publications.

# Experience

# Estate and asset planning

- Creation and administration of various private foundations of up to \$10 million.
- Counsel to estate of U.S. citizen and French resident with respect to examination of French inheritance tax.
- Counsel to individuals and families of various levels of wealth up to \$90 million assisting them
  to plan for wealth transfer through QPRT's, irrevocable insurance trusts, private annuities,
  limited liability companies, charitable remainder trusts, charitable lead trusts, qualified
  domestic trusts, and GRAT's.
- Counsel to closely-held, family businesses advising them in approaches to equitably treat both active and inactive members and general succession issues including the drafting of buy-sell agreements.
- Counsel to individuals in advance of marriage including the drafting of "living together" agreements and prenuptial agreements.
- Counsel to fiduciaries of estates in connection with probate administration of varying sizes.
- Counsel to estates of various sizes to assist in administration with related to assets located in various locations throughout the world.



 Personal representative to various estates holding diverse assets including private equity funds, early stage companies and various real estate interests.

### Tax

- Represented a corporation through a trial in the Tax Court to preserve deductions taken related to forbearance fees.
- Represented individual taxpayers leading to settlement a few weeks prior to trial in Tax
   Court.
- Represented foreign individual taxpayers to effectively plan for their acquisitions of real estate in the U.S.
- Counsel to subcontractor in the sale of his business for \$65 million structured as a sale of shares of an S corporation under §338(h)(10) and subsequent defense of the plan during an IRS examination resulting in "no change".
- · Various §1031 exchanges of real estate.
- Represented food distribution corporations on Appeals within the IRS involving \$500,000 of tax in dispute.
- Represented various taxpayers to successfully resolve Offers in Compromise in matters exceeding \$17 million.
- Represented many taxpayers to compromise criminal tax exposure related to failure to report income from foreign bank accounts and to file foreign bank account reports.
- Counsel to various not-for-profit organizations including private foundations and Section 501(c)(6) trade organizations, and his experience includes the defense of challenges by the IRS of their statuses as tax exempt.

## Recognitions

- Super Lawyer in 2004, 2006, and 2007
- Top Rated Lawyer in Tax Law by American Lawyer Media and Martindale-Hubbell, 2013

### Outside Posternak

- Newton Commonwealth Foundation, Trustee and President
- · Hebrew Senior Life, Trustee
- Fundraiser and participant in the Pan Mass Challenge for more than 11 years
- Commentator on tax issues for the Boston Globe, Business Weekand other publications.