JEFFREY P. HART

Member

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"The business environment and continuing complexity of the tax laws have expanded the role of the business and tax lawyer from a somewhat narrowly focused specialist to that of a business consultant. The Internal Revenue Code has such a significant financial impact on so many aspects of a business or personal transaction, that it is more important than ever to have a clear understanding of the provisions of the Code which can turn potential tax pitfalls into tax planning opportunities."

Jeff is a founding member of the firm and concentrates his practice in the areas of taxation, business law and estate planning. Earlier in his career, Jeff practiced as a certified public accountant in the tax division of an international accounting firm where he gained expertise addressing the business and tax issues facing closely held businesses and high net worth individuals. His diversified professional experience typifies the firm's partners and strengthens its expertise. Jeff is also a member of the firm's Management Committee.

Bar and Court Admissions

Massachusetts Bar
United States Court of Appeals, First Circuit
United States Tax Court

Memberships

Massachusetts Bar Association
Boston Bar Association
Boston Estate Planning Council
Associated Industries of Massachusetts Tax Committee
Massachusetts Society of Certified Public Accountants

Achievements

- Named a Massachusetts Super Lawyer by *Boston Magazine,* 2004 thru 2010
- Voted one of the Top 100 Lawyers in Massachusetts by *Boston Magazine*, 2004

Recent Transactions

- Formulated estate planning strategy for family business owner designed to minimize estate taxes, provide for succession of family business solely to adult child active in the business, ensure financial security for surviving spouse, and achieve asset protection for inheritances of all children (e.g., divorce, risk of litigation).

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- Structured cash distribution and profit allocation waterfall in $80 million sale and roll-up of specialty media company
- Reorganized real estate development of assisted living construction project to achieve tax benefits for investor participants
- Planned tiered entity structure for optimal income and estate tax benefits for national expansion of transportation and logistics company
- Obtained first favorable Massachusetts private letter ruling utilizing reorganization plan to eliminate 10.5% financial institution tax

Publications

- *New Rules Accelerate Taxation of Deferred Compensation*, Massachusetts Lawyers Weekly, June 2006
- *Estate Planning for Family Owned Businesses*, MCLE, December 2005
- *New Tax Strategy Can Eliminate 10.5% Financial Institution Excise Tax*, December 2002
- *Buy-Sell Agreements for Shareholders*, Boston Business Journal, September 1999
- *Limited Liability Companies—The Entity of Choice in Massachusetts,* National Business Institute, 1998
- *Family Limited Partnerships and Limited Liability Companies in Massachusetts,* National Business Institute, 1996
- *Estate Planning 101—Wills, Trusts and Estate Tax Planning,* LIFENOTES, May/June 1994
- *The New Massachusetts Estate Tax,* February 9, 1993
- *Estate Planning, Medicaid Planning & Long Term Care,* LIFENOTES, Winter 1991
- *S Corporations are Becoming More Appealing Vehicles for Leveraged Investments*, Small Business Taxation

Teaching and Seminars

- New England School of Law 1986-1997—Adjunct Professor of Law in Advanced Corporate Taxation and Business Planning
- Suffolk University Law School, Boston 1989-1997—Lecturer on Estate Taxation
- CPA/Law Forum—Estate Planning Update / Practical Application, November 2006
- ReedLogic—DVD Video Presentation on Estate Planning for Corporate Executives, March 2007
- Mellon Bank—Passing the Family Business to the Next Generation, April 2005
- Executive Benefit Forum, January 20, 1999—Tax Planning for SERP Benefits, McAree
- The Taxpayer Relief Act of 1997, December 16, 1997
- GRITs, GRATs, CRATs, CRUTs, and QPRTs, May 11, 1994
- Executive Compensation Techniques, April 1993
- Buy-Sell Agreements for Corporations, November/December 1988 and December 8, 1992
- Split Dollar Life Insurance Techniques, June 23, 1993

Education

B.B.A., University of Notre Dame, 1974
J.D., *cum laude*, New England School of Law, 1979
Certified Public Accountant, 1981