



tax planning

tax planning for trusts and estates

Our tax department represents high-net-worth individuals and their closely held companies in all aspects of creative estate planning, post-death planning, trust and estate administration, and related trust and estate litigation.

tax controversy & litigation

We assist clients in a wide variety of federal, state and local tax controversies relating to income tax, estate and gift taxes, sales and use taxes, gross receipts taxes and property taxes. We represent both domestic and foreign clients in complex tax audits and examinations by the Internal Revenue Service, the California Franchise Tax Board, the California Employment Development Department, the California State Board of Equalization, and other state and local taxing authorities. Our attorneys include a former Special Assistant U.S. Attorney and an Attorney (Estate Tax) with the Internal Revenue Service.

- Negotiating with auditors and appellate officers to minimize tax liabilities.
- Litigating disputes, including in the U.S. Tax Court, the U.S. Court of Federal Claims, Federal District Courts and before administrative and state law agencies, all in an expeditious and cost-effective manner.
- Resolution of property tax disputes with the California State Board of Equalization and local County Assessors, and representation of clients at hearings before administrative boards in the resolution of property tax disputes.
- Sophisticated sales and use tax disputes with the California State Board of Equalization and other State agencies for clients domiciled both within and outside of California.
- Negotiating numerous employment tax disputes with the Internal Revenue Service, the California Employment Development Department, and other State agencies. Special expertise in controversies involving whether an employer has properly classified one or more of its workers as an employee or an independent contractor.

practice contact

David Wheeler Newman

attorneys

Jeffrey D. Davine

Jeffrey K. Eisen

Robert J. Lowe

Chris Luna

Autumn Ronda

related practices areas

nonprofit organizations



headlines

12 MSK Attorneys Named to the 2026 Edition of Southern California *Super Lawyers*
Super Lawyers, February 20, 2026

37 MSK Attorneys Named Among *The Best Lawyers in America*® for 2026
Best Lawyers, August 21, 2025

34 MSK Attorneys Named Among *The Best Lawyers in America*© for 2025
August 15, 2024

MSK Welcomes Partner Chris Luna
December 29, 2023

38 MSK Attorneys Named Among *The Best Lawyers in America*© for 2024
August 17, 2023

Mitchell Silberberg & Knupp Partner Robin C. Gilden Named a 2023 Lawyer of the Year by The Best Lawyers in America©
Business Wire, August 23, 2022

26 MSK Attorneys Named Among *The Best Lawyers in America*© for 2022
August 19, 2021

33 MSK Attorneys Named Among *The Best Lawyers in America*© for 2021
August 20, 2020

27 MSK Attorneys Named Among *The Best Lawyers in America*© for 2020
August 15, 2019

MSK Welcomes Partner Autumn Ronda
March 6, 2019

The Best Lawyers in America© 2019 Recognizes 24 Attorneys from MSK
August 15, 2018

S. Eva Wolf Named to *Profiles in Diversity Journal's* 2018 "Women Worth Watching" List
June 7, 2018

MSK Elects S. Eva Wolf and Janice Luo to Partnership
December 21, 2017

Robin Gilden Quoted in *Variety*
December 19, 2017



MSK Named Among 2018 Best Law Firms
November 1, 2017

The Best Lawyers in America© 2018 Recognizes 24 Attorneys from Mitchell Silberberg & Knupp LLP
August 15, 2017

David Wheeler Newman Presented with Distinguished Service Award from LA Council of Charitable Gift Planners
June 1, 2017

The Best Lawyers in America© 2017 Recognizes 22 Attorneys from Mitchell Silberberg & Knupp
August 22, 2016

David Newman Represents UCLA Foundation in Fielding's \$50 Million Donation
February 18, 2012

news

Jeffrey Eisen Featured in *Mondaq*
Mondaq, July 29, 2025

Autumn Ronda Featured in *Law360* for Move to MSK
March 7, 2019

Autumn Ronda Featured in *Law360* for Move to MSK
March 7, 2019

Jeff Eisen Quoted in *Bloomberg BNA*
February 27, 2019

S. Eva Wolf and Janice Luo Featured in *Law360*
August 9, 2018

Jeff Eisen Quoted in *The Hollywood Reporter* on New Tax Law
December 27, 2017

Robin Gilden Quoted in *Variety*
December 19, 2017

Robin Gilden Quoted in *The Hollywood Reporter*
December 14, 2017

Jeffrey Eisen Featured in *Law360*
October 6, 2017



David Wheeler Newman Mentioned in *L.A. Biz*
L.A. Biz, June 28, 2016

David Newman Quoted in *Law360*
December 24, 2015

MSK Selected for Inclusion in 2016 US News Best Law Firms
November 2015

U.S. News & World Report Recognizes Mitchell Silberberg & Knupp in 2015 "Best Law Firms" Rankings
November 3, 2014

The Best Lawyers in America© 2015 Recognizes 21 Attorneys from Mitchell Silberberg & Knupp and Names 2 Attorneys "Lawyer of the Year"
August 2014

The Legal 500 United States 2014 Edition
June 2014

Robin Gildea Quoted in *Law360*
June 20, 2014

Jeffrey Davine Quoted in *Law360*
May 2, 2014

26 MSK Attorneys Named to 2014 Southern California *Super Lawyers* List
January 2014

U.S. News & World Report Recognizes MSK in 2013-2014 "Best Law Firms" Rankings
November 2013

Four MSK Attorneys Named to Southern California's *Super Lawyers'* Rising Stars List
June 2013

26 MSK Attorneys Named to 2013 Southern California *Super Lawyers* List
January 2013

U.S. News & World Report Recognizes MSK in 2012-2013 "Best Law Firms" Rankings
November 1, 2012

21 MSK Attorneys Selected for *Best Lawyers in America 2013*
August 24, 2012

MSK Ranked Among Leading Tax Law Firms in *Tax Directors Handbook 2012*
January 26, 2012



25 Named to 2012 Southern California *Super Lawyers* List
January 23, 2012

U.S. News & World Report Recognizes MSK In 2011-2012 "Best Law Firms" Rankings
November 1, 2011

MSK Attorneys Recognized Among "The Best Lawyers in America" for 2012
August 31, 2011

Nine MSK Attorneys Named to Southern California *Super Lawyers*' Rising Stars List
June 13, 2011

Chambers USA Recognizes MSK Attorneys Among America's Leading Lawyers
June 10, 2011

The 2011 Legal 500 USA Guide Recognizes MSK Attorneys and Intellectual Property and Tax Practice Groups
Among the Nation's Best
June 9, 2011

24 Named to 2011 Southern California *Super Lawyers* List
January 25, 2011

Jeffrey Davine Selected for Taxpayer Advocacy Panel (TAP) for 2011-2013
November 23, 2010

MSK Recognized in *U.S. News & World Report/Best Lawyers* "Best Law Firms" Rankings
September 15, 2010

The 2011 Best Lawyers in America Recognized MSK Attorneys from Nine Practice Areas
August 19, 2010

28 Named to 2010 Southern California Super Lawyers List
January 26, 2010

The Best Lawyers in America 2010
August 3, 2009

29 Chosen to 2009 Southern California Super Lawyers List
January 30, 2009

33 Chosen to 2008 Super Lawyers Lists
November 21, 2008

The *Best Lawyers in America* 2009
September 17, 2008



The Legal 500 Ranks MSK Among "Top Firms" and Partners Among "Leading Lawyers"
June 17, 2008

MSK Home to 23 Southern California Super Lawyers for 2008
January 30, 2008

The Best Lawyers in America 2007
December 28, 2007

The Best Lawyers in America in Trusts and Estates in 2007
March 29, 2007

publications

Estate Planning: Looking at Our World Through Income Tax Glasses
67-13 USC Law School Institutes On Major Tax Planning, 2015

What Artworks May Come (to a Museum Near You)
The State of Fractional Charitable Giving at the Intersection of Museology and Tax Policy
Southern California Interdisciplinary Law Journal, 2011

alerts

Estate and Gift Tax Impact of the "One Big Beautiful Bill"
MSK Client Alert, July 9, 2025

New COVID Relief Legislation Provides Tax Benefit
MSK Client Alert, December 28, 2020

Proposition 19 Set to End Major Property Tax Exemption
MSK Client Alert, November 10, 2020

Opportunity Zones Overview
MSK Client Alert, April 19, 2019

Opportunity Zones Overview
MSK Client Alert, April 2, 2019

A Movable Feast
MSK Client Alert, March 28, 2019

Don't Let the IRS Yank Your Passport
MSK Client Alert, March 25, 2019



Is the West Coast the Best Coast?

MSK Client Alert, March 20, 2019

Proposed Regulations Provide Greater Flexibility in Obtaining Credit Support from Foreign Subsidiaries

MSK Client Alert, December 17, 2018

Delinquent Taxpayers May Need to Rethink Travel Plans

MSK Client Alert, November 19, 2018

Section 199A: Deal Considerations When Buying or Selling a Partnership or LLC Interest

MSK Client Alert, November 15, 2018

Is Everyone Now an Employee in California?

MSK Client Alert, May 7, 2018

#MeToo Can Be #Costly

MSK Client Alert, January 23, 2018

Has Your Partnership or LLC Agreement Been Updated to Comply with the New Tax Rules?

January 17, 2018

The Tax Cuts and Jobs Act

December 19, 2017

Year-End Tax Planning for College Football Fans

MSK Client Alert, December 11, 2017

IRS Gives Surviving Spouses a Second (or Third) Bite at the Portability Apple

MSK Client Alert, July 10, 2017

California State Board of Equalization Gutted

MSK Client Alert, July 5, 2017

Can Charitable Remainder Trusts Avoid the Self-Dealing Rules?

MSK Client Alert, May 15, 2017

Is the Border Tax Crossing the Line?

MSK Client Alert, February 23, 2017

IRS Confirms - No More Phone Calls (At Least Not Initially)

MSK Client Alert, July 18, 2016

IRS Releases Draft Form 8971, Information Regarding Beneficiaries Acquiring Property From a Decedent

December 31, 2015



The Numbers Are In... er, Projected
September 18, 2015

IRS Extends Due Date For New Basis Reporting Rules
August 21, 2015

New Law Steps Up Reporting Requirements for Executors
August 11, 2015

A Trust May Be Subject to California Income Taxation if the Trustee Resides in California
April 15, 2015

California Supreme Court to Review Controversial Documentary Transfer Tax Case
January 30, 2015

Qualifying for 501(c)(3) Tax Exempt Status is Tricky
November 5, 2014

Equal Tax Treatment for Same-Sex Couples in the Wake of Recent Supreme Court Ruling and IRS Guidance
MSK Client Alert, January 2014

2012 Gift Tax Planning - A Golden Opportunity
MSK Client Alert, April 17, 2012

"How Will the IRS Find Out?" Here's How
MSK Client Alert, January 19, 2012

California Enforces New Isolationist View on Property Tax Exemptions for Nonprofits
MSK Client Alert, August 4, 2011

IRS Backs Off of Gift Tax on 501(c)(4) Contributions
MSK Client Alert, July 7, 2011

Potential Gift Tax Liability for Contributions to 501(c)(4)s - UPDATE #2
MSK Client Alert, May 10, 2011

Reminder: New Tax Act Includes Gift Tax Opportunities
MSK Client Alert, February 14, 2011

Potential Gift Tax Liability for Contributions to 501(c)(4)s - UPDATE
MSK Client Alert, January 27, 2011

Significant Tax Law Changes Under the New Tax Act
MSK Client Alert, December 20, 2010



Potential Gift Tax Liability for Election Year Contributions to 501(c)(4) Social Welfare (Political?) Organizations
MSK Client Alert, October 14, 2010

2010: The Year Of The Taxable Gift
MSK Client Alert, September 29, 2010

Significant Tax Law Changes Under the Small Business Jobs Act of 2010
MSK Client Alert, September 27, 2010

Tax Provisions of The HIRE Act: Business Incentives and Offshore Compliance
MSK Client Alert, March 23, 2010

Estate Tax "Repeal"
MSK Client Alert, February 2010

Estate Tax Consequences of Pre-1970 Charitable Remainder Trusts
Vol. III, No. 4

events & speaking engagements

Required Minimum Distributions After the SECURE Act and SECURE Act 2.0
April 22, 2025

Leave 'Em A Dollar, That Should Keep Them in Line: Effective Planning to Avoid Contests
November 7, 2018

Gifts of Copyrights, Trademarks and other Intellectual Property
October 18, 2018

HSAs Compliance Obligations Under the Internal Revenue Code and ERISA
May 30, 2018

Primer on Ethics and Circular 230 Issues for Young Attorneys
May 10, 2018

Preparing Gift and Estate Tax Returns and the Audit Process
April 13, 2018

Estate and Gift Tax Return Preparation and Audit Tips
February 20, 2018

Dodging Bullets and Navigating Minefields
Helpful Tips for Preparing Estate and Gift Tax Returns and Resolving Audits from Two Former IRS Attorneys
January 25, 2017



Estate Planning: Looking at Our World Through Income Tax Glasses

October 19, 2016

Dealing with the Self-Dealing Rules

October 18, 2016

Did I Really Miss That? Top 10 Common Mistakes Tax Practitioners Make in Trust and Estate Planning and Administration and Can They Be Fixed?

September 27, 2016

Estate and Gift Tax Returns: Common Mistakes and How to Fix Them

February 11, 2016

Did I Really Miss That? Top 10 Common Mistakes Tax Practitioners Make in Trust and Estate Planning

January 27, 2016

Entertainer & Athlete Loan-Out Corporations

January 26, 2016

A Former IRS Attorney's Perspective on Common Mistakes in Estate and Gift Tax Returns

January 14, 2016

Fiduciary Ethics Violations that can lead to Litigation and/or Liability

October 15, 2013

Gift Acceptance Policies and Procedures

May 30, 2013

Making Money: Financial Expert Secrets Revealed

May 6, 2013

Effective Gift Acceptance Policies and Procedures

October 5, 2012

Special Tax Rules that Apply to S Corporations Wishing to Develop Charitable Gifts of S Corporation Assets

September 17, 2012