

Jeffrey A. Markowitz
Principal

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Jeff Markowitz engages in a wide range of sophisticated tax areas including corporate tax, partnership tax and international tax. He has represented companies ranging from multi-national corporations engaged in mergers and acquisitions to start-up entrepreneurial clients. Mr. Markowitz has provided tax and business structuring advice on strategic joint ventures, creative employee equity compensation and cross border tax planning. His practice also includes sophisticated tax structurings to minimize state and local taxes including sales taxes, state income taxes and recordation and transfer taxes.

Mr. Markowitz is a frequent lecturer in the area of choice of business entity including the use of limited liability companies. He has served on two ad hoc committees of the Maryland State Bar dealing with revisions to the Maryland General Partnership Act and the Maryland Limited Partnership Act. Mr. Markowitz assists members of the corporate practice group in the tax aspects of mergers and acquisitions.

In the international area, Mr. Markowitz has given advice to both offshore companies establishing businesses in the United States and U.S. companies establishing business abroad. He has also advised companies with respect to cross-border merger and acquisition issues.

Mr. Markowitz is an adjunct professor of law at the University of Baltimore School of Law where he has taught business planning at both the law school and graduate tax program and advance real estate tax planning and corporate taxation at the graduate tax program. Mr. Markowitz was elected chair of the Maryland State Bar Tax Section for 2003 and has served on the Tax Section Council of the Maryland State Bar since 2000. In addition, Mr. Markowitz is a long-standing participant in the Maryland Advanced Tax Institute, which he chaired in 2000. He is currently President of the Maryland Institute for Continuing Professional Education of Lawyers (MICPEL).

Mr. Markowitz has advised several privately held entrepreneurial companies regarding limited liability company structuring to combine income and estate planning whereby older generation ownership can pass growth through to younger generations with minimal gift and income tax consequences. Mr. Markowitz's practice also includes sophisticated real estate transactions, including tax-free exchanges under Section 1031 of the Internal Revenue Code, structuring transactions to ensure capital gains treatment on real property proposed for development and structuring real estate joint ventures.

Practice Areas:

- Banking & Finance
 - Affordable Housing
- Corporate & Securities
 - Outsourcing & Technology Transactions
- Tax
 - Business Tax Planning
 - International Tax
 - Mergers & Acquisitions Tax Planning
 - Real Estate Tax Planning

State & Local Tax

Bar Admissions/Court Admissions:

Maryland
United States Tax Court

Education:

Villanova School of Law, J.D. 1984, *Cum Laude*, Order of the Coif and Research/Projects
Editor Villanova Law Review.
Villanova University, B.S. 1981, *Summa Cum Laude*, Beta Gamma Sigma and Phi Kappa Phi.

Affiliations, Associations and Special Achievements:

American Bar Association: Section of Tax; Corporate Tax Committee

Baltimore Magazine: Listed as a "Maryland Super Lawyer" (2007, 2008)

International Council of Shopping Centers

Maryland Advanced Tax Institute: Chair (2000)

Maryland State Bar Association: Section of Taxation, Chair (2003)

Maryland State Bar: Committees on Revised Uniform Partnership Act 1997 and Revised Uniform Limited Partnership Act 2002

MICPEL: President and Executive Committee Member (2007-2008); Vice President and Executive Committee Member (2005-2007)

The Best Lawyers in America: Listed for Tax Law (2006, 2007 & 2009)

University of Baltimore School of Law: Adjunct Professor of Law

Publications:

"Computer Services Tax Draft Regulations Issued," Miles & Stockbridge Tax & Wealth News Brief (March 2008).

"Going Global? Success lies in the right corporate structure," *World View* (newsletter for Maryland Department of Business & Economic Development) (Winter 2003).

"Maryland Homeowners," Miles & Stockbridge Tax & Wealth News Brief (February 2008).

"Notice to Sophisticated Tax Planners: Recent Decision Demands Increased Diligence When Discussing Privileged Information," *National Public Accountant* (June 2003).

"Proposed Regulations on Transfers of Controlling Interests in Maryland – Do They Go Too Far?" *Tax Talk* (newsletter published by the Section of Taxation of the Maryland State Bar Association, Inc.) (Summer 2008).

"Real Estate Tax Incentives," *Maryland Bar Journal* (November/December 2006).

Speaking Engagements:

"7th Annual Advanced Limited Liability Entities," MICPEL, Columbia, Maryland (September 2000).

"Advanced Sales & Use Tax in Maryland," Lorman Institute, Baltimore, Maryland (January 2006)

"Business Organizations," *Essentials of Maryland Practice*, MICPEL, Columbia, Maryland

(April 2004).

"Buy-Sell Agreements," MICPEL, Rockville, Maryland (January 2000).

"Family Limited Partnerships and Limited Liability Companies in Virginia," National Business Institute, Fairfax, Virginia (January 2005)

"Limited Liability Companies and Limited Partnerships in Maryland," National Business Institute, Baltimore, Maryland (November 2003).

"Limited Liability Company Update in Virginia," National Business Institute, Fairfax, Virginia (January 2004).

"LLC vs. LLP in Virginia, Which Entity is Best For Your Client?" National Business Institute, Fairfax, Virginia (October 25, 2005).

"Overview of Partnership Law; Choice of Business Entity," MICPEL, Baltimore, Maryland (May 1997).

"Property Taxes Recordation and Transfer Taxes," Lorman Institute, Baltimore, Maryland (September 2003).

"Real Estate Tax Issues in Maryland," Lorman Education Services, Baltimore, Maryland (May 2004-July 2006).

"Sales and Use Tax in Maryland," Lorman Institute, Baltimore, Maryland (October 2003).

"Section 1031 Exchanges - From Plain Vanilla to Beyond Cheesecake," Chesapeake Tax Conference; Baltimore, Maryland (October 2001).

"Tax Issues on Choice of Entity Planning, Pitfalls and Possibilities: Various Tax Issues Through the Life Cycle of a Business," Lorman Institute, Baltimore, Maryland (February 12, 2008).

"Transfer Taxes," Business Law Institute, MICPEL, Columbia, Maryland (April 2004).