



## Jon P. Schimmer, Partner

Practice Areas	Aviation and Marine Tax, International Private Client Education Tax, Corporate and Individual Trusts and Estates Public Agency Nonprofits
Admissions	California
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### Professional Summary

Jon P. Schimmer advises clients on all areas of international, federal, state and local tax and business matters. Jon's practice focuses on tax and business planning for corporations, limited liability companies and partnership, particularly with respect to formations, acquisitions, mergers and reorganizations, and liquidations. He has extensive experience in advising clients about income, estate and gift tax issues, as well as audit and controversy matter for various tax organizations. Jon is admitted to practice in the U.S. District Court, Southern District of California and before the U.S. Tax Court.

### Representative Matters

- Counsels real estate developers and investors with respect to acquisitions, exchanges and sales, and advises with respect to income and property tax minimization and deferral.
- Represents clients with related business and tax negotiation of operating agreements, structured finance and related and unrelated party joint ventures.
- Assists foreign nationals with pre-immigration and US business planning, with an emphasis on

minimizing US income and transfer taxes.

- Advises families and individuals on estate planning and wealth transfer techniques designed to minimize gift and estate taxes by utilizing both basic and sophisticated trust structures and family limited partnerships and limited liability companies.
- Represents charitable nonprofits in connection with formation, obtaining and maintaining exempt status and engaging in business transactions including for-profit joint ventures, low-income housing projects and charter school operations.
- Counsels businesses and individuals on sales and use tax nexus, and planning to avoid property tax reassessments.
- Advises businesses in connection with structuring and maintaining incentive plans, including stock option and bonus plans, to maximize founder and employee tax and economic benefits.
- Counsels closely held business owners on business succession planning techniques and buy-sell agreements using life insurance and other features.
- Represents clients facing tax controversies in the areas of federal and state income tax, sales and use tax and property tax.
- Represented corporate skateboard and apparel manufacturer to structure and consummate a tax-efficient sale of the seller's trademark to a buyer and former licensee for buyer's exclusive use of the trademark in the Philippines.

## **Community**

- San Diego County Bar Association – Audit Committee Member
- American Bar Association
- American Institute of CPAs – Foreign Trust Task Force, International Technical Resource Panel
- California Society of CPAs, San Diego
- Christ Lutheran Church – Audit Committee
- IRS Low-Income Taxpayer Assistance Program – Volunteer
- IRS Western States Taxpayer Liaison Group
- La Jolla Conservancy – Former Pro Bono Legal Counsel



- March of Dimes Foundation – Charity Golf Tournament Committee
- Philanthro – Pro Bono Legal Counsel, Board
- San Diego County Bar Association – Taxation Section Past Chair, Tax Seminar for Fire Victims Co-Organizer
- Senior Community Center – Food Service Volunteer
- Society of Trust and Estate Practitioners, San Diego
- SpecialVillage.com – Pro Bono Legal Counsel
- Tax Court Pro Se Taxpayer Assistance Program – Volunteer
- The State Bar of California – Taxation Section: International Tax Committee Past Chair, Exempt Organizations Committee, Young Tax Lawyers Division Past Chair

## Education

- LL.M. (Taxation), University of San Diego School of Law, *magna cum laude*, 2001
- JD, University of San Diego School of Law, *cum laude*, Order of the Coif, 2001 (*San Diego Law Review* Member)
- BS (Accounting), Pepperdine University, 1992

## News Coverage

- [“Simulations Plus Acquires Lixoft, Expanding Modeling Software Offerings and Broadening Presence in Europe,”](#) Business Wire, April 2, 2020.
- Fracassa, Dominic. “Procopio represents Italian drugmaker in sale to Salix,” *Daily Journal*, July 11, 2014.
- Baxter, Brian. “Cadwalader Takes Corporate Inversions to Another Level,” *The American Lawyer*, July 9, 2014.

## Seminars

- “International Tax Update,” CalCPA International Tax Discussion Group, San Diego, CA, January 23, 2020.

- “International Tax Update,” Considine & Considine Continuing Education Seminar, San Diego, CA, January 16, 2020.
- “Cross Border M&A in a TCJA World,” 15th Annual USD-Procopio International Tax Institute, San Diego, CA, October 18, 2019.
- “Attracting and Retaining Quality Employees with Equity Incentive Arrangements,” SDSI Accelerator Mentor Forum, Solana Beach, CA, May 7, 2019.
- [“International Tax Update After the Tax Cuts & Jobs Act,”](#) CalCPA Society 21st Annual Tax & Accounting Institute, San Diego, CA, December 7, 2018.
- “International Provisions of US Tax Reform: Planning Opportunities,” Got International! CPA Study Group, San Diego, CA, January 23, 2018.
- [“New IRS LB&I Compliance Campaigns: OVDP Declines-Withdrawals; Repatriation; Form 1120-F Nonfilers; and Inbound Distributors,”](#) 13th Annual USD-Procopio International Tax Institute, San Diego, CA, October 27, 2017.
- [“U.S. Tax Reform and Potential Effects on Cross-Border Transactions,”](#) 23rd Annual U.S.-Mexico Bar Association Annual Conference, San Diego, CA, September 29, 2017.
- [“Running a Social Enterprise: Legal Structure and Tax Considerations,”](#) Mission Edge San Diego Accelerator + Impact Lab (SAIL) Speaker Series, San Diego, CA, September 25, 2017.
- [“Taking Your Tax Practice International,”](#) CalCPA Society 20th Annual Tax & Accounting Institute, San Diego, CA, November 18, 2016.
- Moderator. “Voluntary Disclosure Programs: Recent Developments & How Long Will They Last?” USD Procopio International Tax Institute, October 21, 2016.
- Moderator. “Taxation Dilemmas of International Retirement Plans,” USD Procopio International Tax Institute, October 20, 2016.
- [“Foreign Asset Reporting & Current Voluntary Disclosure Programs,”](#) CalCPA Society 19th Annual Tax & Accounting Institute, San Diego, CA, November 20, 2015.
- Moderator. “U.S. Treaty vs. Revised Model Treaty,” 11th Annual USD-Procopio International Tax Institute, San Diego, CA, October 23, 2015.
- Co-Presenter. “Current Practical Problems for Taxpayers in OVDP and Streamlined,” 11th Annual USD-Procopio International Tax Institute, San Diego, CA, October 23, 2015.

- [“Taking Your Tax Practice International,”](#) California Society of CPAs, La Jolla, CA, September 3, 2015.
- Co-Presenter. “OVDP and FATCA Update: The Nuts and Bolts of Streamlined Filing and Proving Non-Willfulness,” University of San Diego, School of Law, June 25, 2015.
- “Recent Developments in IRS Offshore Disclosure Programs,” CalCPA Society 18th Annual Tax & Accounting Institute,” San Diego, CA, November 21, 2014.
- Moderator "OVDP - Opt Out with New IRS 2014 Rules," USD Procopio International Tax Institute, October 30, 2014.
- “International Tax Update,” California Society of CPAs Downtown Discussion Group, San Diego, CA, August 7, 2014.
- “FATCA Withholding, Reporting and Policies for Outbound Payments,” Hutchinson & Bloodgood University, San Diego, CA, July 11, 2014.
- “International Tax Reporting Update and Compliance Options,” California Society of CPAs International Tax Discussion Group, Carlsbad, CA, July 30, 2014.
- “OVDP and FATCA Update: The Ever Changing Issues of International Tax Compliance” University of San Diego, School of Law, June 26, 2014.
- “Business and Tax Planning for Real Estate Holdings,” California Society of CPAs, San Diego, CA, June 18, 2014.
- “Taking Your Tax Practice International,” Hightower San Diego CPA Education Association, San Diego, CA, January 2014.
- Panelist. “Starting the Race Against the tax Authority in the International Tax World” – Statute of Limitations & Lack of Filings,” USD, School of Law – Procopio International Tax Institute, San Diego, CA, October 24-25, 2013.
- Moderator. “A Critical Look at the IRS Offshore Voluntary Disclosure Program – 5 Years Out,” USD, School of Law – Procopio International Tax Institute, San Diego, CA, October 24-25, 2013.
- “A Critical Look at the IRS Offshore Voluntary Disclosure Programs – 5 Years Out,” USD School of Law-Procopio International Tax Institute, San Diego, CA, October 2013.
- “Starting the Race Against the Tax Authority in the International Tax World – Statutes of Limitation & Lack of Filings,” USD School of Law-Procopio International Tax Institute, San Diego, CA, October 2013.



- “Navigating Offshore Tax and Compliance Issues,” California Society of CPAs, Downtown Discussion Group, San Diego, CA, July 2013.
- “[Important International Tax Issues for Cross-Border Business and Foreign Investors.](#)” State Bar of California, International Law Section, San Diego, CA, May 31, 2013.

## **Publications**

- Co-author. “[Mandatory Deemed Repatriation: Do You Owe Taxes for 2017?](#)” March 26, 2018.
- Contributing author. “[Mexico’s Proposed Tax Reform: International and Cross border Highlights.](#)” October 2013.