



## David S. Neufeld

*Shareholder*

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**David S. Neufeld**, a member of the firm's Board of Directors, has practiced law for more than 35 years, advising individuals and businesses around the globe on sophisticated federal income and estate tax planning, state tax residency planning and audits, asset protection, and insurance and investment planning. In addition, he helps business clients engaged in both inbound and outbound transactions (most notably involving China and India) as well as the individual tax issues that arise from cross-border business transactions.

Among the areas in which Mr. Neufeld has become well known includes planning with "private placement life insurance," captive insurance companies, and planning for snowbirds. He is also highly sought after to consult with taxpayers and their legal and accounting advisors on "aggressive tax planning gone bad," including delinquent foreign asset reporting, Form 8886 filings (and misfilings), tax audits and U.S. Tax Court litigation, as well as an expert witness in the consequential civil litigation.

David serves on the Joint Editorial Board for Uniform Trust & Estate Acts of the Uniform Laws Commission (ULC). The board, an arm of the ULC, monitors legal developments in trust and estate law and recommends new uniform acts or amendments to existing acts. In 2007, David was appointed ABA Advisor to the ULC drafting committee for the "Uniform Insurable Interest in Trust" Law. He has been past chair of the Insurance & Financial Planning Committee of the Real Property, Trust & Estate (RPTE) Section of the American Bar Association among other leadership positions within RPTE. In 2006, David became Chairman of the Synergy Summit, a leadership organization whose members include the top leaders from within the ABA, AICPA, SFSP, NAELA and NAEPC, among others.

A pioneer in domestic and offshore limited liability company law, including chairing the "Single-Member LLC Task Force" for the New Jersey State Bar Association's Tax Section and drafting the Caribbean island of Nevis' LLC ordinance and its captive insurance amendments, Mr. Neufeld was one of four lawyers in the state to be awarded the New Jersey State Bar Association's 1998 "Advocacy Award." David is rated AV-Preeminent by Martindale-Hubbell, its

### Practice Areas

Tax Law  
Trusts and Estates Law  
Business and Corporate Law

### Admissions

Florida  
New Jersey  
New York  
Pennsylvania  
U.S. Tax Court

### Education

New York Law School, J.D.,  
*cum laude*  
New York University, LL.M.,  
Taxation  
Duke University, A.B.

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highest rating, has been designated an Accredited Estate Planner by the National Association of Estate Planners and Councils, and has been listed in New Jersey's and South Florida's *Top Rated Lawyers* and *Super Lawyers*.

Having received his A.B. from Duke University, his J.D. *cum laude* from New York Law School and his LL.M. in Taxation from New York University School of Law, David served a two-year appointment as attorney-advisor to Judge Julian I. Jacobs of the United States Tax Court. He has been admitted to the Society of Trust & Estates Professionals (STEP), has been a member of the Board of Trustees of Prosperity New Jersey and was on the Editorial Advisory Board of the *Asset Protection Journal*. He has published scores of articles and has spoken around the world on his areas of concentration, as well as having been featured in *BusinessWeek*, *Medical Economics*, *The Wall Street Journal* and appearing on CNBC both in the U.S. and in Asia, among others. One of David's favorite hobbies outside the office is performing stand-up comedy.

### REPRESENTATIVE MATTERS

- Represented a newly formed private equity company in the purchase of a 92.5% interest in GS Pacific ER LLC, the owner of a shopping center in San Jose, California. The transaction included complex negotiations of the purchase agreement, operating agreement, and loan documents.
- Served as tax counsel in the sale of an in-home personal care, skilled nursing, and behavioral services company to a leading provider of care and support solutions. The transaction was structured to minimize Philadelphia tax, as well as state income tax while providing sophisticated tax planning for the owners to accomplish their overall objectives and meet their needs.
- Represented client in a joint venture of major travel wholesalers from outside the US, each with a distinct US-based market and client base. The client recognized the firm's deep experience representing businesses moving across international borders. The other joint venture partner was represented by an AmLaw 100 firm.

### HONORS & AWARDS

- Advocacy Award, New Jersey State Bar Association, 1998
- Rated AV® Preeminent™ by Martindale-Hubbell
- Named a "Top Lawyer," Taxation, *South Florida Legal Guide*, 2020
- Named an Awesome Attorney, *South Jersey Magazine*, 2018
- Named as a New Jersey "Super Lawyer," by Thomson Reuters, publishers of *New Jersey Super Lawyers* magazine

*A description of the standard or methodology on which the accolades are based can be found here. No aspect of this advertisement has been approved by the Supreme Court of New Jersey.*

### PROFESSIONAL AFFILIATIONS

- ABA Appointee to Joint Editorial Board of the Uniform Trust Commission for Trust & Estate Acts
- American Bar Association, Real Property, Trust & Estate (RPTe) Section
  - Past Chair of Corporate Sponsorship; Council; among others
- American Bar Association, Tax Section, Member
- National Association of Estate Planners & Councils, Accredited Estate Planner

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- Society of Trust & Estates Professionals, Member
- Prosperity New Jersey, Past Board Member
- *Asset Protection Journal*, Editorial Advisory Board

#### **ARTICLES & ALERTS**

The Corporate Transparency Act: New Reporting Requirements  
*LEGAL ALERT* (December 4, 2023)

Potential Taxation Without Representation: The Implications of State Taxation on Teleworking  
*FG Law Blog* (February 5, 2021)

Client Gift of Vacation Home to SLATs: Valuable Technique but Traps to Consider  
*Estate Planning, a Thomson Reuters publication* (February 1, 2021)

IRS Pitches Its Micro-Captive Settlement Offer: Is It a Home Run or a Strikeout For Taxpayers?  
*Leimberg Information Services, Inc.* (October 1, 2019)

IRS Makes QOZs Compelling But You Have To Mine The Regulations  
*Dimensions Newsletter, New Jersey Builders Association* (Summer 2019)

Guide to the Surprises Lurking in the QOZ Proposed Regulations  
*Legal Alert* (April 25, 2019)

The Biggest Surprise in the QOZ Regs Is How Many Surprises There Are  
(April 23, 2019)

Residency Test Is Trickier Than You Think  
*South Florida Business & Wealth* (March 4, 2019)

Webber: Are Insurance Dedicated Funds Superfluous?  
*Tax Notes*

To IDF or Not to IDF  
*MFA Reporter*

The Keyport Ruling and The Investor Control Rule--Might Makes Right?  
*Tax Notes*

The 419(e) Plan--Reports of its Death are Greatly Exaggerated  
*FSP Journal*

Tax Planning with Private Placement Life Insurance  
*Asset Protection Journal*

New Version of 419 Plans--An Impending Train Wreck  
*FSP Journal*

New Guidance on Investor Control Rule--Road Map or Roadblock?  
*Tax Notes*

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Nevis Entertains Amendments to its Business Corporations, LLC and Insurance Ordinances--Offshore Investment

Keeping it All--Using Private Placement Life Insurance to Achieve Tax Free Investment Returns

IFC Economic Report Big Debate: Propriety of Tax Planning

Calculating the Sec. 6707A Penalty: When a Return is Not The Return--Yari v. Commissioner

The ILIT Liability Minefield: Trustees' and Counsels' Risks--ABA Real Property, Trust and Estate Section  
(Fall 2010)