

BROWN | STREZA



DAVID KELIGIAN, J.D., M.B.A., CPA

PARTNER

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PRACTICE AREAS

Business Tax Planning

Business Representation

Business Succession Planning

Federal and State Income Tax

Audits and Appeals

Income Tax Planning

ABOUT

David Keligian is a tax partner with the Orange County, California law firm of Brown & Streza, LLP. David's representation of business owners includes income and estate planning, with emphasis on i) structuring acquisitions and dispositions of businesses and real estate, ii) the resolution of federal and state tax controversies, iii) planning to avoid California residency and taxes for both individuals and businesses, and iv) business succession planning. He has served as an expert witness in tax matters in state and federal courts. David is a Fellow of the American College of Tax Counsel (ACTC - actconline.org), a fellowship which is reserved for tax attorneys who have made an exceptional contribution considered preeminent by their peers.

David received his Juris Doctor with Moot Court Honors, his M.B.A. as a Dean's Scholar, and his B.S. in Accounting, Magna Cum Laude, all from the University of Southern California. Prior to joining Brown & Streza, LLP, David spent eighteen years as a tax attorney and shareholder at The Busch Firm, with prior experience as the managing partner of a 25 attorney business law firm in Los Angeles, as well as practicing as a C.P.A. with Peat Marwick. His public accounting experience included consulting regarding acquisitions and dispositions of U.S. businesses and real estate, corporate taxation, international transfers of know-how and technology, and tax planning for non-resident individuals and corporations.

David is widely published on a range of tax, accounting, and finance subjects, and a well-recognized panelist and lecturer for the California Continuing Education of the Bar, the California CPA Foundation, the USC Tax Institute, the U.S. Federal Court, the California Department of Real Estate, and the California Society of CPAs on various tax and accounting topics.

David is very involved in the community as a Board Member of the Pacific Club, Director and CFO of the Armenian EyeCare Project, which honored him with its Lifetime Humanitarian Award, a member of the Board of Trustees of the Diocese Endowment Fund, and a prior member and Chairman of the Legal Committee of the Ararat Home of Los Angeles.

PROFESSIONAL BACKGROUND

Brown & Streza LLP, Irvine, California
Partner, 2011-Present

The Busch Firm, Irvine, California
Tax Attorney/Shareholder, 1993-2011

Grayson, Givner, Booke, Silver & Wolfe, Encino, California
Tax and Managing Partner, 1986- 1992

Freshman, Marantz, Orlanski, Comsky & Deutsch, Beverly Hills, California
Tax Associate, 1984-1986

Peat, Marwick, Mitchell & Co., Los Angeles, California
4 years practice as C.P.A., 1979-1983

Juris Doctor, **University of Southern California**, 1980

Master of Business Administration, **University of Southern California**, 1980, Dean's List

Certified Public Accountant, California, 1982

Bachelor of Science, Accounting, Magna Cum Laude, **University of Southern California**, 1977

Admissions:

United States District Court, Central District of California, 1980

United States Court of Appeal, Ninth Circuit, 1980

United States Tax Court, 1982

United States Claims Court, 1986

PROFESSIONAL RECOGNITION

American College of Tax Counsel (ACTC): Fellow, Member

- Elected for extraordinary accomplishments and professional achievements and for dedication to improving the practice of tax law

2015 - 2024 **"Southern California Super Lawyer"**

2011 - 2013 **OC Top Attorney** as published in **OC Metro Magazine**, August 2011, August 2012, and August 2013

Received **California Society of CPAs** award for top course materials for **Federal Tax Procedure** course.

PUBLICATIONS

Orange County Lawyer, July 2024

- Co-author, Maximizing Value - Overlooked Pre-Transaction Planning Opportunities in M&A Deals

Orange County Lawyer, March 2024

- Co-author, Qualified Small Business Stock: A Rare Planning Opportunity

Orange County Lawyer, November 2023

- Co-author, 1031 Delayed Exchanges: Avoiding Common Traps

Orange County Lawyer, February 2023

- Exiting California: Avoiding Common Misconceptions

Orange County Lawyer, November 2022

- Taxation of Damages: A Primer for Litigators

Business Succession - The Essentials Ebook, September 2021

California Trusts and Estates Quarterly, In 2 parts, Volume 19, Issue 4 and Volume 20, Issue 2, 2014

- Co-author, California Income Tax Issues for Non-California Trusts

CEB Financing and Protecting California Businesses, February 2013

- Co-author of Chapter "Tax and Accounting Elections"

The Journal of Taxation, November 2011

- Winning Independent Contractor Disputes With an IRS Predisposed to Find Employees

The Journal of Taxation, October 2009

- Co-author, Taxation of Life Settlements - Unanswered Questions After Revenue Rulings 2009-13 and 2009-14

Business Law News, State Bar of California, Issue 4 2004

- LLCs for Start-Ups: Yes or No?

Taxes, September, 2003

- Family Partnerships and Code Section 2036 - Judicial Activism Targets Family Entities

CEB Capitalizing and Protecting New Businesses, California Continuing Education of the Bar, 1996, and subsequent updates

- Agreements Among Founders
- Tax and Accounting Elections
- Consultant, Selecting and Forming Business Entities

The Practical Tax Lawyer, (national A.B.A. publication) Winter 1995

- GRATs and GRUTs: What They Are and How to Draft Them (with Checklist)"The Journal of Taxation, February, 1994
- Appraisal Issues Now Require Greater Attention for Tax Planning to be Effective

California Society of CPAs published course materials, 1993

- Awarded "Outstanding Course Material Award" from Society
- Successfully Representing Clients Before The IRS

California Continuing Education of the Bar, 1987 to 1991

- Co-author, supplement to "Tax Practice in California"

San Fernando Valley Construction Journal

- Tax Planning with Trusts, September, 1991
- Leading Edge Tax Planning with Family Partnerships, August, 1991
- Audits of Developers and Contractors - What the IRS Looks For, May, 1991
- Questions and Answers on Exchanges, April, 1991
- Using Exchanges Effectively, March, 1991
- Avoiding Tax Disasters, January and February, 1991

Los Angeles Business Journal, September 3, 1990

- IRS Hits Independent Contractor Issue

Practical Tax Lawyer, Summer, 1987

- A Primer on the New Passive Loss Rules

Los Angeles Business Journal, April, 1988

- A Weaker U.S. Dollar - Influx of Foreign Entertainment Companies

Hollywood Reporter, August, 1988

- Deal Making Protocol with the Japanese

Taxation for Accountants, October, 1988

- Passive Activity Regulations Require More Sophistication in Record Keeping
- Reprinted in Taxation for Lawyers, November/December, 1988

Co-Author, for California Escrow Association, November, 1988

- FIRPTA - A Manual for Escrow Officers

Los Angeles Business Journal, September, 1989

- Don't Rush to Open Your Business Files to the IRS

Los Angeles Daily Journal, November 14, 1989

- Liability of Tax Return Preparers
- Book review

Los Angeles Business Journal, (article on use of ESOPs for LBOs), December 11, 1989

- Financing Laws Transform Corporate Landscapes

SPEAKING ENGAGEMENTS

National Business Institute, Speaker, 2023

- Planning for Real Property Transactions and Exchanges

The Rushmore Group, Instructor, 2022

- How to Help Your Business Clients Solve Their Biggest Problem

Business Owner Summit hosted by WealthWise Financial Services, Panelist, 2019

USC Tax Institute, Speaker, 2011

California Continuing Education of the Bar, Moderator and Panelist, 2009

- How to Think Like an MBA: Business Concepts for Lawyers

Lorman Educational Services, Instructor, 2004

- Recognizing the Blind Spots in the World of Partnerships, LLPs and LLCs

National Business Institute, Instructor, 2003

- Family Limited Partnerships and Limited Liability Companies in California

Lorman Educational Services, Instructor, 2003

- Partnerships, LLCs, and LLPs - Organization and Operation in California

California Continuing Education of the Bar, Advanced Course of Study, Panelist, 2000 to present

- Representing Start-Ups and Emerging Growth Companies

OCBA Capital Markets Conference, Panelist, 1999

- Selected Planning Concerns for Company Founders

California Continuing Education of the Bar, Panelist, 1991 and 1992

- Recent Developments in Business Law Practice

Tax Section of the State Bar of California, Panelist, 1991

- Tax Planning for Real Estate Dispositions and Exchanges
- New Developments in Estate and Gift Planning
- Taped and distributed by The Rutter Group

California CPA Foundation, Instructor, 1990 to 1992

- Tax Issues in Bankruptcy and Debt Restructuring

Tax Section of the State Bar of California, Panelist, 1990

- Corporate Tax Planning and Drafting for the Acquisition and Disposition of Corporate Business
- Taped and distributed by The Rutter Group

California Continuing Education of the Bar, Panelist, 1990

- Advising California Professional Partnerships and Corporations

U.S. Federal Court, Instructor on accounting and finance

CES Seminars, Lecturer on corporate valuation and transactions and tax aspects of real estate

California Society of CPAs, Los Angeles and Orange County chapters, Lecturer and Instructor on various tax topics

U.C.L.A. Extension, Guest Lecturer on real estate tax and finance, 1989 and 1990

California Society of CPAs 1989 Pension Planning Conference, Planning Committee and Speaker on structuring ESOPs

The Business Channel, Guest Commentator on real estate taxation, 1990

Educational Seminars Ltd., Instructor and Course Author, 1990

- Strategies in IRS Representation

California Department of Real Estate, Education Division, Pre-Approved Instructor on Section 1031 Exchanges, 1990

COMMUNITY INVOLVEMENT

American College of Tax Counsel (ACTC) – Fellow (Member)

Pacific Club – Board of Directors, 2018 – 2022, 2023-Present and Finance and Legal Committees, 2010 – Present

Armenian EyeCare Project – Director and CFO, 2002 – Present

- 501(c)(3) organization with over \$2 million in annual revenues. AECF operates a mobile eye hospital and clinics, offers physician training and fellowships, and provides patient screening, free surgical procedures, and public education in the Republic of Armenia.

Western Diocese Endowment Fund – Board of Trustees, 2000 – Present

- Endowment Fund which supports the operations of the Western Diocese of the Armenian Church of North America

Armenian Assembly of America – Chairman of Audit Committee, 2003 - 2008

Ararat Home of Los Angeles – Board Member and Chairman of Legal Committee, 1990 – 2000

- Assisted living, old age, convalescent hospital and skilled nursing facility

American Bar Association Tax Section – Member