

#### **Practice Areas**

- Tax
- Tax Controversy & Litigation

## Education

- Trinity Law School, J.D.;
  Law Review
- The University of Alabama School of Law, LL.M. in Taxation
- Rabbinical College of America, Bachelor of Religious Studies

### **Bar Admissions**

- · California
- Texas

### **Court Admissions**

- · Texas Supreme Court
- California Supreme
  Court

# **Asher Fried**

Senior Counsel Houston

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Asher Fried is a senior counsel in the Tax Controversy & Litigation Section of Chamberlain Hrdlicka in the Houston office.

Asher has significant experience representing clients in federal and state corporate and partnership income taxation; taxation of entity structuring and restructuring; taxation and tax compliance of captive insurance companies and qualified opportunity funds; trust income taxation; gift and estate taxation; California property taxation; California sales and use taxes; like-kind exchanges; employee retention credits; Paycheck Protection Program loans and loan forgiveness, including California taxation of PPP loans; formation and organization of corporations and limited liability companies, including drafting governing documents; drafting trust agreements; and advising charitable organizations formed by the family owners of Westland.

Employing 1033 principles to a \$24 million settlement in a fraud case, Asher enabled his client to defer millions of dollars in taxes. He structured a multi-million dollar real estate transfer in California to avoid change in ownership reassessment for property tax purposes; saving hundreds of thousands of dollars annually in increased property taxes. He also structured and formed two qualified opportunity funds, enabling the client to defer millions of dollars of capital gains through investment in the QOFs. He successfully provided compliance advice for a client's captive insurance companies, enabling the captives to avoid audit at a time when IRS audit of captives is substantially increasing. He regularly and successfully structured and formed business entities with the goal of avoiding California taxation.

Prior to joining the firm, Asher worked for 10 years as in-house tax counsel for Westland Real Estate Group, a mid-size real estate firm in Long Beach, California.