Baker McKenzie.

Glenn G. Fox

Partner
Baker & McKenzie LLP
New York

GLENN.FOX@BAKERMCKENZIE.COM
T + 1 212 626 4689
F + 1 212 310 1789

Related Expertise

Financial Institutions

Tax

Tax Disputes

Wealth Management

Biography

Glenn G. Fox is a partner of Baker McKenzie's Wealth Management and Tax Practice Groups in New York and a member of the firm's Global Tax Wealth Management Steering Committee. He is a domestic and international tax, estate planning, and tax-exempt (charitable) organizations lawyer with vast experience working with closely held businesses, families and charitable organizations from the US and overseas. Glenn is a member of the American College of Trust and Estate Counsel and of the Society of Trust and Estate Practitioners and has been recognized for fourteen consecutive years (2007-2020) as a "New York Super Lawyer" by the New York Times.

Practice Focus

Glenn's wealth management practice focuses on the use of sophisticated wills, trusts, closely held entities, tax-exempt (charitable) entities and non-charitable purpose trusts to enable clients to bequeath and gift assets with the imposition of the least amount of transfer and income taxes. He has significant experience in dealing with closely held business interests, retirement assets, foreign assets, foreign trusts and US and international tax exempt organizations. He represents domestic and foreign clients with worldwide assets in succession, estate, trust, tax and tax exempt/not-for-profit organization matters. Glenn's tax exempt/not-for-profit practice includes all elements of establishing and operating US and non-US charitable organizations that do business in the US and abroad.

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Representative Legal Matters

- Represents non-US entrepreneurs establishing US business ties with their treaty based US income tax and estate tax planning
- Represents major publicly traded US multinational fashion company with respect to its corporate philanthropy via various US private charitable foundations
- Represents European based founders of software and healthcare companies on US pre-immigration personal tax planning and US philanthropic planning via foreign charitable foundations
- Represents European privately held multinational consumer products company with US charitable foundation operations
- Represents major publicly traded US company with the establishment of a non-charitable purpose trust structure
- Represents New Jersey based family owning interests in closely held Asia based multinational company on international tax and estate planning
- Represents multiple generations of US based family owning multinational manufacturing company on estate and philanthropic planning that includes charitable foundations and social welfare organizations
- Assists various charitable foundations with international ties for the purpose of establishing public charity branches in the United States
- Represents royal family from Europe with respect to the restructuring of various US trusts that date back to the 1920s for gift tax planning
- Advises the heirs of a pharmaceutical manufacturing company in a significant family trust matter

Professional Honors

- Ranked, Chambers Private Wealth Law, 2021
- Best Lawyers, Trusts & Estates, New York Times and US News, 2021
- Who's Who Legal, Private Client, 2016-2020
- New York Super Lawyer, New York Times, 2007-2020
- Recommended Lawyer, Legal 500 US

- US News Top New York Lawyer, Estate Planning, 2020

Professional Associations and Memberships

- American College of Trust and Estate Counsel - Member
- New York Chapter, Society of Trust and Estate Practitioners - co-Chair
- International Section of the New York State Bar Association (NYSBA) - House of Delegates Member; Past Section Chair; Section Caucus and International Section Executive Committee Member
- UJA-Federation of New York Trusts and Estates Group - Member
- New York City Bar Association - Member

Admissions

District of Columbia~United States (1992)

New York~United States (1991)

Connecticut~United States (1991)

New Jersey~United States (1990)

Education

New York University (LL.M. Taxation) (1994)

Albany Law School (J.D., cum laude) (1990)

Cornell University (B.A.) (1987)

Publications & Presentations

- Co-author, "The Estate Tax Should Not Apply to Domestic Stock Owned by NRAs," Quinnipiac Probate Law Journal, Publication Date Pending.

- Co-author, "The IRS's Interim Guidance on Section 4960 Leaves Corporate Philanthropists Wondering About the Feasibility and Cost of Compliance," Corporate Taxation, November/December 2019

- Panel Chair and Speaker, "Asian/North American Estate Planning for the Coming

Decade," NYSBA International Section Global Conference, Tokyo, November 2019

- Panel Chair and Speaker, "US-Canadian Estate Planning," NYSBA International Section Montreal Meeting, October 2018
- Speaker, "US Tax Reform," STEP Israel Conference, Tel Aviv, Israel, June 2018
- Panel Chair and Speaker, "International Estate Planning," NYSBA International Section Guatemala Meeting, October 2017
- Speaker, "Charitable Planning," American Bar Association Skills Training Program, New York Law School, July 2017
- Speaker, "US-Israel Cross Border Wealth and Tax Planning," STEP Israel Conference, Tel Aviv, Israel, June 2017
- Co-author, "U.S. International Trust Reporting and Planning," NYSBA International Law Practicum, Vol 29, No. 1, 2016
- Co-author, "Impact on Business Valuations of Lapsed Rights and Restrictions on Liquidation of an Interest: Is this the End of Valuation Discounting as we Know it? - Section 2704 Proposed Regulations Released," Baker & McKenzie Alert, August 2016
- Panel Chair and Speaker, "Hot Federal and New York Issues in Estate Planning," New York City Bar, 10 November 2016
- Speaker at HSBC conference on family business succession planning, 3 November 2016
- Speaker, "US-Cross Border Estate Planning," Iranian-American Bar Association, 2 November 2016
- Panel Chair and Speaker, "Common Reporting Standards for Trustees, Family

Offices and Protectors," NYSBA International Section Paris Meeting, 21 October 2016

- Speaker, "US-Israel cross border wealth and tax planning," STEP Israel Conference, Tel Aviv, Israel, 16 June 2016
- Speaker, "US Expatriation Tax Regime," Israel Bar Association, Tel Aviv, Israel, 14 June 2016
- Speaker, "Worldwide Charitable Planning," New York State Bar Association International Section Sao Paulo, Brazil Meeting, October 2015
- Speaker, "Cross-Border Estate Planning," PKF International Tax Meeting, October 2015
- Speaker, "US Offshore Voluntary Disclosure Program," Israel Chapter of Society of Trust and Estate Practitioners, June 2015
- Speaker, "US Pre-Immigration Planning for Germans," NY Chapter of Society of Trust and Estate Practitioners, November 2014
- Chair and Speaker, "Living With the New NYS Estate, Gift & Trust Income Tax Provisions," New York City Bar Conference, October 2014
- Chair and Speaker, "Trusts in Civil Law Jurisdictions," New York State Bar Association International Section Vienna, Austria Meeting, October 2014
- Speaker, "US Offshore Voluntary Disclosure Program," NY Chapter of Society of Trust and Estate Practitioners, August 2014
- Speaker, "US Cross Border Wealth Transfer Planning," Israel Chapter of Society of Trust and Estate Practitioners, June 2014
- Chair and Speaker, "Global Wealth Transfer Planning – A comparison," New York

State Bar Association International Section Hanoi, Viet Nam Meeting, October 2013

- Co-author, "FATCA and Non-U.S. Trusts and Trust Structures—Compliance Options Exist," Journal of Taxation, August 2013