Norman A. "Norm" Lofgren

Senior Counsel

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Norm Lofgren focuses his practice on helping clients build and protect their businesses, minimize tax exposure and preserve wealth from generation to generation. Norm's clients include domestic and international closely-held businesses, high-net-worth families, entrepreneurs and professionals, and they rely on him to advise on all types of business and wealth protection issues, ranging from complex estate, tax and business planning to structuring multi-million dollar transactions and resolving tax audits and controversies. A significant portion of Norm's practice is devoted to helping businesses owners and families design comprehensive succession planning strategies to facilitate the seamless transition of ownership to family members or trusted employees.

Norm previously served as tax counsel for a major international energy company, where he gained a strong understanding of the unique challenges his clients face when expanding their operations abroad. He helps clients plan strategically on the front end for every possible issue that may arise, including a detailed analysis of the various legal, financial, political and safety risks involved with doing business in a particular country. As a former trial lawyer for the IRS, Norm also brings an insider's perspective to helping clients resolve tax audits and other disputes initiated by government agencies, and he can assess the regulatory risks associated with each course of action his clients take. Moreover, Norm has senior level military experience as a Naval officer in Asia (non-lawyer capacity), including Korea, Japan and Thailand.

Experience

- Lead counsel in *Estate of Albert Strangi v. Commissioner*, a multi-million dollar test case in the U.S. Tax Court and Fifth Circuit Court of Appeals against the IRS involving family limited partnerships.

- Structured complex estate and business plans utilizing both domestic

Industries

Energy

Practices

Trusts & Estates
Taxation

Education

LL.M., Taxation, Southern Methodist University (1981)
J.D., *with distinction*, Oklahoma City University, While attending law school, Norm served as the Case Comments Editor of the *Oklahoma City University Law Review*. (1977)
B.A., University of Missouri (1969)

Bar Admissions

Texas, Active
District of Columbia, Inactive

Court Admissions

United States Tax Court
United States District Court, Northern District of Texas
United States Court of Federal Claims
United States Court of Appeals, Fifth Circuit

and international techniques

- Structured multi-million dollar domestic and international transactions involving natural resources.
- Structured and documented multi-million dollar sales and purchases of business entities and business properties.
- Represented many clients before IRS and state agencies in audits and administrative appeals as well as litigation of income tax, gift tax and estate tax disputes.
- Counsels business owners, businesses and executives on such matters as: shareholder agreements; employee stock ownership plans (ESOP); key-man life insurance; business succession planning; design and drafting of executive compensation plans such as stock option plans and other equity-based compensation arrangements, phantom stock plans, performance bonus, profit sharing plans, stock appreciation rights (SARs), restricted stock awards and senior executive retention plans (SERPs).

Press Releases

- "Gray Reed Attorney Recognized for Estate Planning" (March 24, 2014)
- "Gray Reed Attorney Recognized for Excellence in Wealth Management" (August 13, 2013)
- "Gray Reed & McGraw Attorneys Listed as 2012 Five Star Wealth Managers" (August 6, 2012)
- "Lofgren Elected as Chair of the DBA Probate, Trusts & Estates Section" (May 25, 2011)
- "Norm Lofgren selected as 2010 Texas Monthly Five Star Wealth Manager" (April 19, 2010)
- "Lofgren Receives Philanthropic Leadership Award From Baylor

United States Court of Appeals, Eleventh Circuit

Health Care System Foundation" (December 18, 2009)

- "Lofgren Teaches Estate Planning Class at SMU" (July 1, 2009)
- "Lofgren Elected Secretary/Treasurer of the Probate, Trust & Estates Section of the Dallas Bar Association" (June 24, 2009)

Thought Leadership

- "IRS Launches Renewed Attack on Valuation of Family Businesses - A Seismic Shift for Estate and Gift Tax Valuations ", Gray Reed & McGraw Legal Alert (August 25, 2016)
- "Opportunity For Retroactive 2012 Gift From IRA To Charity", Gray Reed & McGraw Legal Alert (January 25, 2013)
- "IRS Unsuccessful in Attack on Gifts of Family Limited Partnership Interests", Gray Reed & McGraw Legal Alert (July 19, 2012)

Speeches and Presentations

- "Family Business Succession: Valuations, Sales, SCINs, and Tax Reform", Strafford Webinar (November 7, 2019)
- "Extra Innings: Advising Executors – Choices and Consequences", State Bar Advanced Estate Planning & Probate Course (June 14, 2018)
- "Captive Insurance – Playing Between the Lines", Dallas Bar Association - Tax Section (February 6, 2017)
- "Estate Planning 101: What Individuals Need To Have In Place TODAY For TOMORROW ", Pre-Retirement Seminar, Office of the Comptroller of the Currency (December 10, 2015)
- "Estate Planning 101: What Individuals Need to Have in Place Today for Tomorrow. ", United States Comptroller of the Currency pre-retirement Seminar (October 29, 2014)
- "Selected Issues Involving Art and Other Collectibles", Dallas Bar

Association Probate, Trusts & Estates Section (November 26, 2013)

- "Creating, Attacking and Defending Pre-Marital and Post-Marital Agreement", Probate, Trusts & Estates Section of the Dallas Bar Association (November 29, 2012)
- "Eccentric Orbits - Selected Tax and Planning Issues Involving Oil & Gas Interests", Dallas Bar Association, Energy Law Section (November 16, 2011)
- "Incentive Trusts - Control from the Grave", East Texas Estate Planning Council (March 3, 2011)
- "Incentive Trusts - Control from the Grave" (May 14, 2010)
- "Thoughts on Tax and Estate Planning in the New Age", American Airlines Grey Eagles (April 14, 2010)
- "What Cancer Patients and Their Families Need to Have in Place Today for Tomorrow", Baylor Cvetko Center Multiple Myeloma Support Group (March 13, 2010)
- "From Divorce to Second Marriage: Estate Planning and Marital Law Considerations", Dallas CPA Society (May 1, 2009)
- "What Cancer Patients and Their Families Need to Have in Place Today and Tomorrow", Cvetko Patient Education Center (November 3, 2008)
- "Scoundrel, Scalawag, Interloper or Owner: Impacts of Trusts and Estates on Title", Dallas Bar Association, Energy Law Section (September 12, 2008)

Honors

- Selected as a Best Lawyer in Dallas by *D Magazine* (2017, 2019 - 2020)
- Selected by his peers for inclusion in Woodward/White, Inc.'s *The*

Best Lawyers in America in the field of Trusts & Estates, (2013 - 2020)

- Named a "Super Lawyer" by Texas Super Lawyers (a Thomson Reuters company) as published in *Texas Monthly* (2005 - 2019)
- Texas Monthly Five Star Estate Planning Attorney (2010 - 2015)
- AV Preeminent® rated (the highest possible Martindale-Hubbell Peer Review Rating designation)

Organizational Involvement

- Dallas Bar Association
- Chair of the Probate, Trusts & Estate Section of the Dallas Bar Association (2010 - 2011)
- Director, Baylor Health Care System Foundation
- Communities Foundation of Texas Advisory Council (2018 - Present)
- Estate Planning Instructor, Southern Methodist University - Certification Program in Financial Planning (2004 - present)
- U.S. Navy Pilot, Active Duty (1969 - 1975), Reserve (1975 - 1994), retired rank of Captain