

## Jonathan Zhu

PARTNER

Tax  
*Palo Alto*

jzhu@wsgr.com  
650-849-3388

### FOCUS AREAS

Mergers & Acquisitions  
Private Equity  
Tax

### HIGHLIGHTS

- **Wide-Ranging Tax Practice**  
With a practice encompassing nearly all aspects of corporate, partnership, and international tax, Jonathan advises on mergers, acquisitions, private equity transactions, and various capital markets matters.
- **A Recognized Practitioner**  
Jonathan is consistently recognized as a leading tax attorney by *Chambers USA*.

### EXPERIENCE

Jonathan Zhu has a general federal income tax practice, and advises on mergers, acquisitions, private equity transactions, and various capital markets matters.

Prior to the practice of law, Jonathan was an engagement manager at McKinsey & Company. He was a theoretical physicist before law school, and has an *h*-index of 18 for his research.

### CREDENTIALS

#### Education

- J.D., Yale Law School, 1998  
*Editor*, The Yale Law Journal
- Ph.D., Physics, University of California, Berkeley, 1992
- B.S., Physics, University of Science and Technology of China, 1987

#### Associations and Memberships

- Member, State Bar of California

#### Honors

- Named among California's top tax attorneys in the 2011-2023 editions of *Chambers USA: America's Leading Lawyers for Business*, in which clients described him as “very intelligent, very commercial and easy to work with” and “smart and practical, which is what you look for in a lawyer,” with others noting his ability “to discuss any matter with ease”

#### Admissions

- State Bar of California

### INSIGHTS

## Select Publications

- "PFIC Issues for Non-U.S. Real Property Operating Companies," 149 *Tax Notes* 111, October 2015
- "U.S. Tax Issues in Establishing an Off-Shore Start-Up," 144 *Tax Notes* 1571, September 2014
- "Basis Disappearance in All-Cash D Reorganizations," 126 *Tax Notes* 950, February 2010
- "U.S.-Source Interest Income From a Lending Business," 125 *Tax Notes* 785, November 2009
- "Cross-Border Tax Issues Involving Single-Owner Grantor Trusts," 122 *Tax Notes* 1247, March 2009
- "Partnership-Related Withholding Rules for Interest Payments," 109 *Tax Notes* 820, November 2005
- "Tax Deeming Rules: A Method to the Madness," 105 *Tax Notes* 1425, December 2004