N. Todd Angkatavanich

Withers Bergman LLP

Partner - Regional Practice Group Leader, US Trust, Estate and Charitable Planning Group

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Education: Fairleigh Dickinson University, magna cum laude, B.A. • Rutgers University School of Law, Tax Law Honors, Campbell Scholar, • Rutgers Graduate School of Management, M.B.A. • New York University School of Law, Taxation, LL.M.

Admitted: State of NJ, 1993 • State of NY, 1995 • State of CT, 2006 • Registered Foreign Lawyer in the UK, 2007

Year joined: 2005

Year became partner: 2007

Overview

Todd's practice is focused on tax, trusts and estates, and business succession matters for affluent individuals and their families. He regularly advises domestic and international families and family offices with respect to creating trust and related business structures to preserve, protect and grow family wealth for multiple generations in a tax efficient manner.

Todd has significant experience working with clients to structure US and international wealth preservation vehicles such as Family Limited Partnerships, Grantor Retained Annuity Trusts, Sales to Intentionally "Defective" Grantor Trusts, Foreign Grantor Trusts, Qualified Personal Residence Trusts, Buy-Sell Agreements and Preferred Freeze Partnerships. He also advises clients on business succession matters, with a particular emphasis on navigating the various tax pitfalls under Chapter 14 of the Code. In addition, Todd's practice also involves the preparation of estate planning documents for clients including "tax-sensitive" Wills and Revocable Trusts, Generation-Skipping Dynasty Trusts and Irrevocable Life Insurance Trusts. Todd also has experience in advising Hedge Fund and Private Equity Fund professionals with respect to transferring carried interests into multi-generational trusts for the benefit of younger family members in a tax-efficient manner.

Todd has been published in Trusts and Estates, Private Wealth and Estate Planning Magazine, ACTEC Journal, BNA Tax Management, Probate & Property, Private Asset Management and other publications.

Todd is a frequent speaker on estate planning topics such as Family Limited Partnerships, Business Succession Planning and related Chapter 14 issues. He has given presentations, webinars and teleconferences for various organizations including the Heckerling Estate Planning Institute, the ABA Section of Real Property Trust & Estate Law (Spring Symposia, , Fall Joint Meetings and Skills Training Programs), the Seattle Estate Planning Seminar, Trusts & Estate Magazine, BNA/Tax Management as well as numerous estate planning councils, CPA Societies and professional organizations. He has been rated AV Preeminent® by Martindale-Hubbell® Peer Review Ratings™. Todd has been quoted in articles that have appeared in Barron's, Bloomberg Businessweek, The Boston Globe, The Philadelphia Inquirer, The Chicago Tribune, The Miami Herald, MSN Money and other publications.

Todd is co-author of the pending BNA/Tax Managment Portfolio, No. 875, entitled "Wealth Planning With Hedge Fund and Private Equity Fund Interests," scheduled to be published in 2014.

Todd currently serves as Regional Practice Group Leader for the firm's US Trust, Estate and Charitable Planning Group. He also serves as a member of the firm's Pro-Bono Committee and its Diversity Committee. Todd has previously served as the firm's Hiring Partner for its Summer Associate Program as well as its US Associate Training Co-Partner.

Highlights

- Fellow, American College of Trusts and Estate Counsel ("ACTEC")
- Editorial Board, Trusts & Estates Magazine
- Advisory Board, BNA/Tax Management Estates, Gifts and Trusts Journal
- Co-Chair, Business Planning Group - Business Investment Entities Committee of the American Bar Association, Real Property, Trust & Estate Law Section
- Faculty, 2012 and 2015 Heckerling Estate Planning Institute
- 2012 "Private Client Lawyer of the Year" Award, FOR (Family Office Review) Awards, North America, Chicago

- Guest lecturer at Hofstra University School of Law
- Faculty, 2013 and 2014 ABA/RPTE Skills Training Program (Advanced Topics)
- Executive Committee, Connecticut Bar Association, Estates & Probate Section
- Member, Decanting Committee, Connecticut Bar Association
- Member, ABA/RPTE Diversity Committee

Publications and speaking engagements

Presentations:

- “Planning with SCINs and Private Annuities – Seizing Opportunities While Navigating Complications,” 49th Annual Heckerling Institute on Estate Planning, Orlando FL, January 2015.
- “Avoiding the Adverse Effects of Chapter 14 For Closely Held Business Interests, Including Planning Applications and Considerations,” Federal Tax Institute of New England, Hartford CT, October 2014.
- “Closely Held Business Planning with Chapter 14 Implications,” ABA RPTE Skills Training Program (Advanced Topics), New York NY, July 2014.
- “Planning with Estate Freezes, GRATs and Sales to Defective Grantor Trusts” ABA RPTE Skills Training Program (Advanced Topics), New York NY, July 2014.
- “Family Limited Partnerships With Section 2036 Implications,” ABA RPTE Skills Training Program (Advanced Topics), New York NY, July 2014.
- Presentation on “Achieving ‘Business Certainty’ with Buy-Sell Agreements,” to NYSCPA Society Annual Estate Planners Day, New York, NY, May 2014.
- Presentation on “Tarnish-Proof Your Plan: Avoiding the Whipsaw of Valuation Mis-matches in Entity Planning,” at ABA/RPTE 2014 Spring Symposia, Chicago, IL, May 2014.
- Presentation on “How to Make the Grade and Grade a Valuation Report,” at ABA/RPTE 2014 Spring Symposia, Chicago, IL, May 2014.
- Presentation on “Set It – But Don’t Forget It! Avoiding the Devil in the Details in Administration of Estate Planning Vehicles” to CBA Estates & Probate Section, New Haven, CT, April 2014.
- Teleconference presentation on “IRS Continues Attach of Estate Planning Practices under Chapter 14 Valuation Rules” to ABA Business Planning Group, March 2014.
- Bloomberg BNA webinar on “Best Tips to Structure & Administer a Family Limited Partnership,” February 2014.
- Presentation on “The Preferred Partnership GRAT,” for the InterActive Legal Booth Lecture Series, Orlando, FL, January 2014.
- Presentation on “Wealth Planning with Hedge Fund and Private Equity Fund Interests” in connection with “Breakfast with Bloomberg BNA Authors,” Orlando, FL, January 2014.
- Video lecture on “The Preferred Partnership GRAT” for Trusts & Estates magazine, January 2014. Please click here to view this lecture on wealthmanagement.com.
- Presentation on "Essentials of Chapter 14: A Practitioner's Guide Through the Minefield," 58th Annual Seattle Estate Planning Seminar, Seattle WA, October 2013.
- Presentation on "Transfer Tax Planning with Carried Interests in Hedge and Private Equity Funds," ABA Section of Taxation and Section of Real Property, Trust and Estate Law, Trust and Estate Division, 2013 Joint Fall CLE Meeting, San Francisco CA, September 2013.
- Webinar presentation on "Estate and Income Tax Planning Implications in the Divided States of America After the DOMA Ruling," Trusts & Estates Magazine, July 2013. Click here to view the webinar at on24.com.
- Presentation on "Preventative Medicine for the Family Office - How to Avoid a Tax Heart Attack," 2013 Opal Conference, Newport, RI, July 2013.
- Presentation on "Family Business Planning with Chapter 14 Implications," ABA/RPTE Skills Training Program (Advanced Topics), New York Law School, July 2013.
- Keynote presentation on "Planning Opportunities and Pitfalls to Avoid - Things That Family Advsiors Need to Know," 2013 Family Office Review Conference, Chicago, IL, June 2013.
- Presentation on "Estate Planning Recent Developments," New York State CPA Society Estate Planners Day, New York, NY, May 2013.
- Presentation on "Avoiding Implosion: Tips from the IRS, Litigators and Planners on Administration of Estate Planning Techniques," ABA RPTE Spring Symposia, Washington D.C., May 2013.
- Lecture "History of Family Limited Partnerships," Hofstra University School of Law, April 2013.

- Lecture "Wealth Transfer Planning," Charles F. Dolan School of Business, Fairfield University, April 2013.
- Webinar presentation on "International Tax Issues for the Domestic Estate Planner," Bloomberg BNA, April 2013.
- Webinar presentation on "Family Limited Partnerships: Where We've Been, Where We're Going," February 2013.
- Webinar presentation on "Chapter 14 Essentials: A Practitioner's Guide Through The Minefield," ABA Section of Real Property, Trust and Estate Law, February 2013.
- Presentation on "Wealth Transfer Planning with Carried Interests for Private Equity Partners," Philadelphia Estate Planning Council, Philadelphia, PA, November 2012.
- Presentation on "Planning with Preferred Partnerships," Boston Estate Planning Council, Boston, MA, November 2012.
- Presentation on "Planning with Hard to Value Assets," to ABA Business Planning Group, November 2012.
- Presentation on "Essentials of Chapter 14," New York City Estate Planning Council, New York, NY, October 2012.
- Presentation on "Essentials of Chapter 14," Connecticut Bar Association, New Haven, CT, October 2012.
- Presentation on "Family Limited Partnerships 'Soup to Nuts'," to New York CPA Society, October 2012.
- Panel presentation on "Chapter 14 Overview with Planning Implications," ABA Section of Taxation and Section of Real Property, Trust & Estate Law, Trust & Estate Division, 2012 Joint Fall CLE Meeting, Boston, MA, September 2012.
- Webinar presentation on "Planning with Family Limited Partnerships - where we've been, where we're going," for Bloomberg BNA/Tax Management, August 2012.
- Webinar presentation on "Chapter 14 'In a Nutshell' - A Practitioner's Guide Through The Minefield," for Bloomberg BNA/Tax Management, June 2012.
- Presentation on "Chapter 14 In a Nutshell: A Practitioner's Guide Through the Minefield," New Haven, CT, June 2012.
- Teleconference presentation on "Multiple Planning Opportunities Using Preferred Partnerships," to the Business Planning Group of the American Bar Association, Real Property Trust & Estate Law Section, April 2012.
- Presentation on "A Ten Point Diagnostic Test of Your Family Limited Partnership," at the 46th Annual Heckerling Estate Planning Institute, Orlando, FL, January 2012. Watch Todd discuss this presentation on Trusts & Estates' Industry Insights Live from Heckerling.
- Webinar presentation on "The Latest on Family Limited Partnerships," for Pennsylvania Institute of Certified Public Accountants, December 2011.
- Presentation on "Business Transition and Certainty Planning Opportunities Under the Tax Relief Act," to CBIA Family Business, Norwalk, CT, November 2011.
- Presentation on "Planning with Formula Clauses," to New York State Society of CPAs, Foundation for Accounting Education, October 2011.
- Presentation on "Protecting the Principals," Greenwich, CT, October 2011.
- Presentation on "Estate Planning for Private Equity/Hedge Fund Carried & Profit Interests," New York, NY, October 2011.
- Webinar presentation on "Partnership Soup - Nuts Included!" for Trusts and Estates magazine, September 2011.
- Teleconference presentation on "Pre-Immigration Tax Planning" September 2011.
- Presentation on "Unique Wealth Transfer Planning Opportunities for Fund Professionals in 2011 and 2012, Greenwich, CT, May 2011.
- Presentation on "Window of Opportunity: Saving Taxes in 2011-2012 and Providing for Certainty with Succession Planning," Greenwich, CT, May 2011.
- Presentation "Fixin' to Die Rag - When Boomer Estate Plans Mature - From Representing The Client to Administering The Estate," ABA Section of Real Property, Trust & Estate Law 22nd Annual Spring Symposia, Washington D.C., April 2011.
- Presentation on "Multi-Generational Wealth Planning," Trust, Estates and Alternatives Conference, Ivy Plus, New York, March 2011.
- Presentation on "Estate Planning in 2011," for Private Asset Management, New York, NY, February 2011.
- Presentation on "International Tax and Estate Planning Issues for Fund Principals," NY, January 2011.
- Teleconference presentation on "International Aspects of Estate Planning," New Haven, CT, December 2010.
- Presentation on "Vertical" and "Non-Vertical" Fund Carried Interest Planning, Greenwich, CT and New York, NY, December 2010.
- Presentations on "Year-End and Other Timely Wealth and Tax Planning Ideas,"
- Presentation on "Business Succession Planning," New York, NY, December 2010, Greenwich, CT and New York, NY, December 2010.
- Presentation on "'Carrying' Wealth to the Next Generation - Estate Planning with Carried Interests in Private Equity, Real Estate and Hedge Funds," New York, NY October 2010.
- Presentation on "Year-End Estate Planning Ideas," December 2010.

- Presentation on "Business Succession Planning with Buy-Sell Agreements," Janny Montgomery Scott Planning for Today program, Orange, CT, June 2010.
- Presentation on "Planning with Preferred Partnerships" at Estate Planners Day 2010, for Estate Planning Council of New York City, Inc., May 2010.
- Presentation on "Trends in Family Offices - Multi-Generational Wealth Planning," for Ivy Plus, Ivy Plus Alternative Investment Network, New York, NY, March 2010.

Publications:

- Co-Author, "To Boldly Go Where No Man (or Woman) Has Gone Before: Some Random Thoughts on Estate Planning Past, Present and (More Important) Future," Trusts and Estates Magazine, September 2014.
- Co-Author, "IRS Attacks Common Estate Planning Technique in Estate of Woelbing," Connecticut Bar Association, Estates & Probate Newsletter, June 2014.
- "Trusts Can Materially Participate in Trade or Business: Taxpayer Victory in Frank Aragona Trust v. Commissioner, " wealthmanagement.com, April 2014.
- Co-Author of "Gift Planning With Formula Clauses: From Procter's Progeny to Wandry World (Part 2)," Probate & Property Magazine, Mar/Apr 2014.
- Co-Author of "Gift Planning With Formula Clauses: From Procter's Progeny to Wandry World (Part 1)," Probate & Property Magazine, Jan/Feb 2014.
- Co-Author of "Implementing Early Inheritances: The why and how of giving sooner while living longer," Trusts and Estates Magazine, December 2013.
- Quoted in "Same-Sex Marriage Tax Tips," Chicago Tribune, September 1, 2013.
- "Structure and Integration: The Architecture of Succession," FFI Practitioner, August 2013.
- "On the Horizon: Estate Planning Developments," Tax Stringer, June 2013.
- "Practical Gift Funding Issues When Planning with Hard-to-Value Assets," Connecticut Bar Association, Estates & Probate Newsletter, May 2013.
- Co-Author of "Coming Ashore - Planning for Year 2017 Offshore Deferred Compensation Arrangements: Using CLATs, PPLI and Preferred Partnerships and Consideration of the Charitable Partial Interest Rules," ACTEC Law Journal, Spring/Fall 2013.
- "Beyond (the Fiscal Cliff) and Back in 2013," Trusts and Estates Magazine, February 2013.
- Quoted in "Estate of Confusion Over Inheritance Tax," Investment News, November 2012.
- Quoted in "Coming Changes in Estate Gift Taxes Stir 'Frenzy'," Bloomberg Businessweek, October 2012.
- "The Dynastic Family Limited Partnership - An FLP Coupled with a Twist," BNA Tax Management Estates, Gifts and Trusts Journal, September 2012.
- "Gifting Paralysis," Family Office Review, August 2012.
- "Turn(er)ing the Tables on Taxpayers - Turner II," Trusts and Estates Magazine, July 2012.
- Quoted in "Dynasty Trusts - Death Taxes Spur Activity," Fairfield County Business Journal, June 2012.
- "Adapting to Changing Circumstances," Trusts and Estates Magazine, May 2012.
- Featured in "Stress - Test, Family Business Style," Fairfield County Business Journal, May 2012.
- "Planning for Certainty in Business Direction and Succession," FFI Practitioner, May 2012.
- "Putting It to the Test: Opportunities and Considerations when the Estate Plan is About to Become the Estate Administration," BNA Tax Management Estates, Gifts and Trusts Journal, March 2012.
- "Set It, But Don't Forget It: Practical Tips To Avoid The Devil In The Details After A Transaction Has Closed," Trusts and Estates, September 2011.
- "Changes to Connecticut's Estate and Gift Taxes," Withers Bergman LLP Briefing Notes, May 2011.
- "Preferred Partnership Freezes," Trusts and Estates Magazine, May 2011.
- "An alternative to the vertical slice," Private Asset Management, April 2011.
- "Non-Vertical Carried Interest Transfer Planning-An Alternative to the Vertical Slice," Private Asset Management, March 2011.
- "December 2010 Is The Best Month to Create A GRAT," Withers Bergman Tax Alert Newsletter, December 2010.
- "Going Non-Vertical with Fund Interests - Creative Carried Interest Transfer Planning When The "Vertical Slice" Won't "Cut It," Trusts and Estates Magazine, November 2010.
- "Creative Planning with Preferred Partnerships - The Next Best Thing in Wealth Transfer Planning?" Investment

Management Institute, Wealthy Family/Family Office Forum, Greenwich, CT, June 2010.

- "Black Shirts (Black, Shurtz) and the Marital Deduction Mis-match," Trusts and Estates Magazine, June 2010.
- "Pre-Liquidity Planning - Do It Now," Trusts and Estates Magazine, April 2010.

Please click here to see a complete list of Todd's publications and speaking engagements

Memberships

- American Bar Association
- Connecticut Bar Association
- New Jersey Bar Association
- New York State Bar Association
- Society of Trust and Estate Practicioners (STEP)

On a personal note

Todd enjoys cooking, wine, writing music, boating and running. In his spare time, Todd enjoys spending time with his wife, Lauretta, their two children and their two Labrador Retrievers.