Withersworldwide

William Kambas

PARTNER | NEW YORK GREENWICH NEW HAVEN



WILLIAM.KAMBAS@WITHERSWORLDWIDE.COM

s +1 203 974 0313

SECRETARY MICHELE DEWAR



MICHELE.DEWAR@WITHERSWORLDWIDE.COM

+1 203 974 0395



Bill is a partner in the US Private Client and Tax team.

He focuses on tax planning for multi-national and multi-state personal, active business, and investment activities, with a particular emphasis on tax structuring and choice of business entity for US and non-US business owners and investors.

Bill has represented a variety of private and public interests, including family-owned, start-up, and multi-million dollar enterprises on purely domestic as well as inbound and outbound business transactions and cross-border investments (whether made directly or through investment funds or joint ventures). In particular, he has considerable experience advising on tax planning for US real estate investments (whether residential or commercial, development, operational, or for personal use). An integral part of Bill's practice involves assisting families and/or their family offices with the formation, management, and/or periodic evaluation of multinational and/or multi-generational centralized control and management structures, such as family offices and private trust companies.

Bill has participated in numerous speaking engagements, industry memberships, and publications. For example, Bill has been a guest lecturer at the Heckerling Institute, the Hellenic Studies Program at Yale University, the Columbia Business School's Family Business Program at Columbia University, the University of Connecticut School of Law, and the Charles F. Dolan School of Business at Fairfield University, as well as with the International Fiscal Association, American Bar Association, and the Society of Trusts and Estates Practitioners.

Bill has been recognized by a number of industry groups, including as one of the 21 People to Know When Starting a Family Office by Business Insider; one of the Top 100 Family Influencers by Family Capital Media; as a Fellow of the American Bar Foundation; as a "key lawyer" by The Legal 500 US in the area of international tax and not-for-profit in 2021 and 2020; as one of the Best Lawyers in the US for the years of 2021, 2020, 2019, and 2018; and as one of the *Connecticut Law Tribune's New England Trailblazers* for 2019. Bill is also a Fellow of the American College of Tax Counsel ("ACTC").

Talks

- 'What is the corporate transparency act?,' The JWE virtual seminar November 21, 2023, speaker
- 'International Commercial Real Estate Investment,' Withersworldwide webinar October 11, 2023, co-presenter
- '*Tax Considerations for U.S. Inbound Business Activities*,' USA Branch of the International Fiscal Association, Westchester/CT Regional Event October 12, 2023, moderator
- 'How is family wealth owned and governed?,' Columbia Business School, Family Enterprise and Wealth, September 19, 2022, visiting lecture
- 'The Role of the Family Office for UNHW Families,' 14th Annual STEP Los Angeles International Trust and Estate Planning Forum May 6, 2022, co-presenter
- 'Global Families in Flux,' 14th Annual STEP Los Angeles International Trust and Estate Planning Forum May 5, 2022, co-presenter
- '5 Best Practices for World-Class Family Offices.' Family Office Association April 5, 2022, interview
- 'A US Tax Lawyer's Perspective on EU Tax Havens,' Yale University, the Euro Crisis (Political Science, Sociology, and Modern Greek Studies) Spring Semester March 17, 2022, visiting lecture
- 'Wine Calling: Strategies for investing in US wineries,' Withers presentation for select Italian clients January 27, 2022, co-presenter
- <u>'Supporting the Family Enterprise: Pre-emptive Planning to Address Threats to the Family Ecosystem</u>,' Family First Institute (FFI) Global Conference 2021 October 18, 2021, co-presenter
- '<u>Who Should Own and Operate a Family Office and Ideal Structures</u>,' Tamarind Learning Podcast Series -November 10, 2020, speaker
- '<u>Family Office Set-up, Structure, and Compliance</u>,' Tamarind Learning Podcast Series November 9, 2020, speaker
- 'Operating the Family Limited Partnership,' ABA Section of Real Property, Trust and Estate Law webinar, October 27, 2020, co-presenter
- 'Trust & Estate Law webinar: Operating the Family Limited Partnership,' webinar to ABA Section of Real Property -October 27, 2020, co-presenter
- '<u>Checklist 2020: Income tax planning for any outcome</u>,' Withersworldwide webinar October 21, 2020, copresenter
- '<u>Family Office Summit: Structuring a New Family Office in the US and Challenges in Advising Existing Multinational</u> <u>Families</u>,' webinar to STEP NY - October 20, 2020, co-presenter
- <u>Withers talks: families and family office | Ep 1 Structuring family offices for tax and investment benefits</u>, Withersworldwide podcast - August 27, 2020, speaker
- *'Family Governance: Generational Continuity through Risk Mitigation, ABA Section of Real Property,*' Trust & Estate Law's 32nd Annual CLE Conference May 14, 2020, co-presenter
- 'Tax and Estate Planning for the Family Business,' Columbia University Business School, Family Business Management - April 20, 2020, visiting lecture
- 'Planning for Investment into the United States,' ___ ALI CLE International Trust and Estate Planning 2019, Washington, D.C. - November 15, 2019, panelist
- 'Planning for the Business Owner: U.S. Clients Who Own Non-U.S. Business Interests,' ALI CLE International Trust and Estate Planning 2019, Washington, D.C. November 15, 2019, panelist
- 'Cross-Border Case Study,' STEP Wyoming International Estate Planning Conference September 21, 2019, copresenter
- 'Avoiding Fiduciary Litigation in the Age of Technological and Digital Transformation,' Robins Kaplan LLP Wealth Planning, Administration, and Disputes Group, The Future of the Fiduciary September 12, 2019, panelist

- 'Family Forum Stories from the Front Lines: Dynamic Estates,' New York State Bar Association, Family Governance Symposium - July 15, 2019, co-presenter
- 'Essentials of Family Offices for the Estate Planner A Primer on Functions, Structures, and Related Issues' at the 53rd Annual Heckerling Institute on Estate Planning by the University of Miami School of Law January 17, 2019, co-presenter
- *'Planning the Estate: Multijurisdictional Estate Planning with a Family Business,'* Columbia University Business School, Family Business Management November 13, 2018, visiting lecture
- 'Family Office Operations 2018: New Ideas and the Evolving Landscape of Taxation,' Citi Private Bank May 3, 2018, co-presenter
- 'Tax reform and the family office', Withers New York and Greenwich event June 2018, speaker
- '5th Annual Family Business School Conference-Family Office Panel,' Columbia Business School February 9, 2018, moderator
- 'US Tax Reform,' STEP Canada/STEP USA Webcast January 19, 2018, panelist
- 'Interactive round table discussion', STEP International Estate Planning Conference Wyoming September 15-16, 2017, moderator
- 'Greek Family Firms: Exploring the Logic and Dynamics of the International Shipping Enterprise' Yale University, The MacMillan Center, Hellenic Studies Program, with Elian Kulukundis, May 2017
- 'Encouraging Engaged Ownership through Legal Architecture,' International Association of Attorneys for Family-Held Enterprises ("AFHE"), Miami, FL, April 27. 2017

External publications

'Family Offices Risk Future Without Investment Policy Statements,' Family Capital - April 30, 2024, quoted '<u>Generational resilience through the integration of governance into structure</u>,' Essential Reads on Family Offices -December 2023, co-author

'Family Capital's 100 Influencers - Lawyers,' Family Capital - January 12, 2023, recognized

'Lacking structure, family offices fail to hire the right advisers,' Family Capital - November 8, 2022, quoted

'*Family offices prepare for a federal register of beneficial ownership in the US*,' Family Capital - November 3, 2022, quoted

'Family offices face regulatory hurdle with new transparency act,' Family Capital - February 8, 2022, quoted

'<u>3 Things Tax Pros Should Know About House's SALT Plan</u>,' Law360 Pulse - November 24, 2021, quoted

'How the \$1.75 trillion Build Back Better plan could impact Americans' taxes,' CNBC - November 24, 2021, quoted

'<u>The best US and East Coast tax and trust lawyers for high net worth individuals</u>,' Spears - September 29, 2021, featured

'Here Are the 21 People to Know When Starting a Family Office,' Business Insider - July 13, 2021, quoted

'Mexican legislative elections and the future of the tax reform,' Withers Insight - July 1, 2021, co-author

'Biden, tax, and how family offices will allocate their wealth,' Family Capital - April 27, 2020, quoted

⁽<u>Private client considerations: Understanding the impact of carried interest regulations on US family partnerships and</u> <u>family offices</u>, Withers Insight - March 16, 2021, co-author

'The Focus of the IRS Global High-Wealth Group,' Tax Notes - March 1, 2021, co-author

'<u>Carried interest in 2021: New guidance for tax on income associated with services provided to investment</u> <u>partnerships</u>,' Withers Insight - January 12, 2021, co-author

'<u>The Corporate Transparency Act: A new US federal reporting requirement for beneficial owners of US entities</u>,' Withers Insight - January 4, 2021, co-author

'State Tax Incentives Face Increased Scrutiny Amid COVID-12,' Law360 Tax Authority - October 30, 2020, quoted

"'There's a Lot of Money To Be Made;" IRS Targets Foreign Real Estate Investors,' The Real Deal - October 16, 2020, quoted

'<u>Generational resilience through the integration of governance into structure</u>,' The International Family Offices Journal, 17th ed. Published by Globe Law and Business Ltd. - October 1, 2020, co-author

"<u>The window for "easy" partnership amended returns for CARES Act benefits is closing</u>," Withers Insight - September 24, 2020, co-author

IRS targets tax compliance by non-U.S. owners of U.S. real estate, Withers Insight - September 24, 2020, co-author

'It takes a village, again: Applying a modern legal perspective with a view to enhancing resilience in family enterprises,'_ STEP Journal Volume 28 Issue 4 - August 28, 2020, co-author

'State CARES Act Decoupling Limits Benefits, Adds Complexity,' Law 360 - July 31, 2020, quoted

'STEP NY IRS Comment Letter,' STEP NY - July 13, 2020, co-author

'<u>An opportunity for U.S. real estate investors: Lower fair market values in 2020 might offer new opportunities for</u> reorganization of holding structures,' Withers Insight - June 4, 2020, co-author

'No, You Can't Deduct A Home Office,' Barron's - May 9, 2020, quoted

'Private client considerations: CARES Act expands taxpayers' ability to utilize net operating losses and excess business losses,' Withers Insight - April 16, 2020, co-author

'Private client considerations: Expanded tax deductions for your interest expense payments with the CARES Act,' Insight - April 8, 2020, co-author

'Private client considerations: Benefits to small businesses from the CARES Act,' Withers Insight - April 6, 2020, coauthor

'<u>Alternative investments should be reviewed to address coronavirus related issues</u>,' Withers Insight - March 31, 2020, co-author

'<u>US federal and state income tax compliance adjustments in the wake of the coronavirus pandemic</u>,' Withers Insight -March 30, 2020, co-author

'Tiered Structures for Family Office Operations: Integrating a Private Trust Company with a Family Office,' Probate & Property: An ABA Publication - September/October 2019, co-author

'Income Taxation of Trusts in the US: Stay Tuned for Controversy,' Trust Quarterly Review (a STEP publication) -September 2019, co-author

'How Wealth Accumulators Can Use Trusts To Avoid State Income Tax,' __ Forbes - July 22, 2019, quoted

'Global Law Firm Withers' Family Office Group Advises Ultra-Rich,' Bloomberg Law - June 25, 2019, featured

'Supreme Court finds North Carolina can't tax trust income,' Tax Notes - June 24, 2019, quoted

'Estate Planning for Owners of Closely Held Business Interests,' Tax Management Portfolio No. 809-4[^th^] - May 2019, cited

INC Trust Tax Row Could Fundamentally Alter Due Process Law, Law 360 Tax Authority - April 18, 2019, quoted

'North Carolina's position on trust questioned,' Tax Notes - April 17, 2019, quoted

'Supreme Court hears arguments on major state trust tax case,' Accounting Today - April 17, 2019, quoted

'Essentials of Family Offices for the Estate Planner - A Primer on Functions, Structures, and Related Issues,' University of Miami Heckerling Institute on Estate Planning - January 2019, co-author

'Post-Wayfair State Developments to Watch in 2019,' Law360 - January 1, 2019, quoted

<u>'Can You Get an Income Tax Break if You Own Multiple Homes in the US?</u> Mansion Global - September 20, 2018, quoted

'Family Offices: Business, Not Personal,' Wealthmanagement.com - June 11, 2018, quoted

'S Corporations vs. C Corporations In 2018,' TaxConnections - May 24, 2018, quoted

<u>'How 40 ambiguities (and outright errors) in the new tax law could cost you big money,'</u> Inc.com - March 13, 2018, quoted

'The "new" alternative minimum tax,' Withers article - February 13, 2018, co-author

<u>'Single family office operations 2018: Recent case law and coordination with legislative developments,</u> Withers article - February 12, 2018, co-author

'An obscure court case that will have a big affect on family offices,' Family Capital - February 8, 2018, quoted

'How the new federal and New York estate tax exemption could affect your estate plan,' Withers article - January 2018, co-author

'How the new federal and Connecticut estate and gift tax exemption could affect your estate plan,' Withers article - January 2018, co-author

'Why the US tax reforms are a headache for family offices,' Family Capital - January 30, 2018, quoted

'US tax reform - Single family offices and considerations for 2018,' - January 17, 2018, co-author

'How the tax code rewrite favors real estate over art,' The New York Times - January 12, 2018, quoted

'Tax changes affecting major real estate markets in the USA,' Withersworldwide.com - January, 2018, co-author

'15 tips for year-end planning in light of the GOP tax bill,' Withersworldwide.com - December 21, 2017, co-author

'Top federal tax regulations of 2017: Year-in-review,' Law 360 - December 18, 2017, quoted

'Effect of proposed US tax bill on family offices and investment vehicles,' Global Tax Weekly - November 30, 2017, co-author

'Update: Effect of proposed US House and Senate tax bills on family offices and investment vehicles,' - November 22, 2017, co-author

'New Year's resolutions - Revising partnership agreements as new audit rules take effect January 1, 2018,' Withersworldwide.com - November 22, 2017, co-author

'US Inbound Taxation: Senate Finance Committee tax reform plan would overturn recent Tax Court decision,' Withersworldwide.com - November 10, 2017, co-author

'Effect of proposed US tax bill on family offices and investment vehicles,' Withersworldwide.com - November 7, 2017, co-author

'Art market may lose 'driving force' as tax plan targets loophole,' Bloomberg Quint - November 3, 2017, quoted

'GOP Aims to Kill the Estate Tax: What it Means for You,' Fox Business Network - November 3, 2017, quoted

'Connecticut Legislature passes Budget Bill (Senate Bill 1502)', Withersworldwide.com - October 30, 2017, coauthor

'Richest Americans doubt they'll really win in Trump's tax plan,' Bloomberg Politics - September 29, 2017, quoted

'Tax Court holds that non-US persons are not subject to tax on gain from the sale of a US partnership interest which is engaged in a US business under certain circumstances', Withers article, August 2017, co-author

'How U.S. Persons Can Be Made Public by the UK Register,' Estate Planning - August 2017, co-author

'New York Banking Royalty's Heirs Are Unloading Art to Save the Family Estate,' Bloomberg, April 2017, quote

<u>'A Mediterranean comparison: Responding to the next steps in the implementation of FATCA and global data</u> <u>exchange</u>, Investment - October 2015, author

Admissions

State of Connecticut, 2003 State of New York, 2004

United States Tax Court, 2004

State of Wyoming, 2019

Education

Skidmore College, B.A.

University of Connecticut School of Business, M.B.A.

University of Connecticut School of Law, J.D. (Certificate in Tax)

Memberships

American College of Tax Counsel ("ACTC"), Fellow

Society of Trust and Estate Practitioners "STEP" (New York), Executive Committee, Chair of Communications 2019-2021

International Fiscal Association (Westchester, NY and Connecticut Region), Executive Committee

Skidmore College Annual Fund, President

Saint Barbara Greek Orthodox Church Endowment Fund, Chairman

Hellenic Bar Association of Connecticut

New York State Bar Association

Connecticut Bar Association

American Bar Association

Key dates

Year joined: 2006 Year became partner: 2014

View full profile online