CHOATE

Renat V. Lumpau

Counsel

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Renat Lumpau specializes in sophisticated tax and estate planning for U.S. and international clients. His advice covers all aspects of wealth management for high net worth clients, including designing comprehensive estate planning solutions to provide for future generations; implementing lifetime giving strategies to minimize gift, estate and generation-skipping transfer (GST) taxes; structuring and analyzing foreign trusts involving U.S. grantors and beneficiaries, and executing charitable planning strategies to meet philanthropic goals in a tax-efficient manner. Renat has written many widely-cited articles on several important tax and estate planning subjects that affect his clients, including the trust decanting technique.

Mr. Lumpau helps clients achieve their most important estate planning goals and resolve their most complicated tax issues. His clients include private equity and hedge fund principals, business owners, government officials, sports team owners, high net worth foreign nationals, and beneficiaries of wealth legacies. He is a frequent author on important estate planning subjects and has been named repeatedly as a *Massachusetts Super Lawyers Rising Star*. Mr. Lumpau is a member of the Society of Trust and Estate Practitioners (STEP) and of the Individual Tax and Private Client Committee of the International Bar Association.

EDUCATION

Harvard Law School
JD, 2009, *cum laude*
Articles Editor and Online Editor, *Journal of Law and Technology*

Harvard College
AB, 2003, *magna cum laude*

PRACTICE FOCUS

Wealth Management
Develop and implement advanced estate planning strategies to create lasting wealth and minimize taxes, and optimize existing structures to address clients' changing needs.

International Estate Planning
Advise on U.S. and cross-border estate planning for U.S. nationals living abroad and foreign nationals with U.S. family members, including income and transfer tax planning with foreign trusts, foreign investments in U.S. real estate and compliance with U.S. international tax rules.

Tax-Exempt Organizations
Represent public charities and private foundations in a broad spectrum of tax and compliance matters.

REPRESENTATIVE ENGAGEMENTS

- Designed creative solutions for modifying the terms of existing trusts, including trust decanting, out-of-court settlement agreements, and court reformations.
- Implemented gifts of carried interests in private equity funds at highly favorable valuations.

ADMISSIONS
Massachusetts

PRACTICE AREAS
Wealth Management

- Established a family office investment structure for an ultra high net worth client designed to pool assets of multiple entities.
- Helped a foreign national with U.S. family members to restructure several existing foreign trusts and implement new tax-efficient U.S. estate planning vehicles.
- Worked with members of a large multi-generational family to build and transfer wealth using private family investment funds.
- Regularly implement GRATs, QPRTs, sales to grantor trusts, split purchase trusts, and other tax-favored techniques.
- Obtained an IRS ruling allowing a client to make a substantial donation to a private foundation using a unique asset.
- Established "friend-of" organizations supporting charities in Asia and the Americas.
- Represented an affiliate of Community Rowing, Inc., the nation's premier non-profit rowing club, in obtaining tax exemption.

PUBLICATIONS AND PRESENTATIONS

Mr. Lumpau has presented at several wealth management and tax conferences in Massachusetts and nationally.

- "Limitations on Lobbying and Political Activities," *chapter co-author*, *Massachusetts Nonprofit Organizations,* MCLE New England, June 2013 and September 2018.
- "Ethical Issues in Trusts & Estates Practice," moderator, Boston Bar Association, June 2018.
- "Changing Trust Situs—When Does it Make Sense?," panelist, New England Estate Planning Conference, 2018.
- "Practical approaches to cross-border inheritance," panelist, IBA Private Client Conference, March 2018.
- "Practical Approaches to Cross-Border Inheritances*," speaker,* IBA Private Client Conference, March 2018.
- "Common-Law Decanting of Trusts: Lessons From Massachusetts," *co-author, Estate Planning Journal*, October 2017.
- "The Uniform Trust Decanting Act," *co-author, Trust & Estates,* January 2016.
- "Elkins: A Double-Edged Sword?," *co-author, Trusts & Estates*, February 2015.
- "Deductibility of Trust and Estate Expenses," *co-author, Trusts & Estates Magazine,* July 2014.
- "Decanting Without a Statute: The Lessons of *Kraft*," *co-author, Trusts & Estates Magazine*, February 2014.

- "Wildly Successful GRATs," *co-author, Financial Advisor Magazine*, January 2014.

PROFESSIONAL AND COMMUNITY INVOLVEMENT

Renat is currently a co-chair of the CLE committee, Trusts & Estates Section of the Boston Bar Association. He has previously served as the Reporter of a Subcommittee to Review the Uniform Trust Decanting Act for Enactment in Massachusetts.