

## Edward Renn

OF COUNSEL | [NEW YORK](#) [NEW HAVEN](#) [GREENWICH](#)  
[BOSTON](#)



EDWARD.RENN@WITHERSWORLDWIDE.COM



+1 203 974 0343

---

SECRETARY PHYLLIS TANESZIO



PHYLLIS.TANESZIO@WITHERSWORLDWIDE.COM



+1 203 974 0382



---

### Ed is of counsel in the private client and tax team.

He focuses on domestic and international private client matters. Ed provides legal advice on US and international estate planning, income maximization strategies, FLP and LLC planning, wealth preservation, business succession planning, international tax planning for entities and individuals, trust structures and estate administration.

Ed often uses sophisticated domestic and offshore insurance strategies to solve client problems. He is a frequent speaker and has co-authored several books on estate planning.

Ed is recognized in the 2025 edition of Best Lawyers® for Trusts and Estates Law.

---

## Talks

- 'All-Star Tax: Tax Issues Associated with the Purchase and Sale of a Residence,' *Surgent's Weekly Expert Hour Webinar Series* - October 16, 2024, speaker
- 'All-Star Tax: What Tax Practitioners Need to Know About Purchasing and Selling a Business,' *Surgent's Weekly Expert Hour Webinar Series* - August 14, 2024, speaker
- 'Summary and Analysis of the Inflation Reduction Act of 2022,' *Surgent's Weekly Expert Hour Webinar Series* - June 28, 2024, speaker

- 'Employee vs. Independent Contractor: Achieving Success in a Worker Classification Audit,' Surgent's Weekly Expert Hour Webinar Series - June 18, 2024, speaker
- 'Taxation of Partnership Distributions and Sales of Partnership Interests,' Surgent's Weekly Expert Hour Webinar Series - June 11, 2024, speaker
- 'Top Individual Tax Planning Strategies,' Surgent's Weekly Expert Hour Webinar Series - June 5, 2024, speaker
- 'Issues and Challenges Related to S Corporations and Partnerships,' Surgent Continuing Education Live Seminar - June 4, 2024, speaker
- 'Weekly Expert Hour,' Surgent's Weekly Expert Hour Webinar Series - May 23, 2024, speaker
- 'Weekly Expert Hour,' Surgent's Weekly Expert Hour Webinar Series - May 16, 2024, speaker
- 'All-Star Tax: Implementing the Corporate Transparency Act,' Surgent's Weekly Expert Hour Webinar Series - May 1, 2024, speaker
- 'Taxation of Partnership Distributions and Sales of Partnership Interests,' Surgent's Weekly Expert Hour Webinar Series - April 29, 2024, speaker
- 'Inflation Reduction Act's Changes to Auto and Energy Related Tax Credits,' Surgent's Weekly Expert Hour Webinar Series - April 17, 2024, speaker
- 'Business Tax Update,' Surgent's Weekly Expert Hour Webinar Series - November 29, 2023, speaker
- 'Top Business Tax Planning Strategies,' Surgent's Weekly Expert Hour Webinar Series - November 20, 2023, speaker
- 'Summary and Analysis of Inflation Reduction Act of 2022,' Surgent's Weekly Expert Hour Webinar Series - November 14, 2023, speaker
- 'Update on the SECURE 2.0 Act,' Surgent's Weekly Expert Hour Webinar Series - October 26, 2023, speaker
- 'Taxation of Partnership Distributions and Sales of Partnership Interests,' Surgent's Weekly Expert Hour Webinar Series - October 23, 2023, speaker
- 'Top Ten Questions from Partnership Clients Regarding the Section 754 Election,' Surgent's Weekly Expert Hour Webinar Series - October 19, 2023, speaker
- 'The Inflation Reduction Act's Changes to Auto and Energy-Related Tax Credits,' Surgent's Weekly Expert Hour Webinar Series - October 18, 2023, speaker
- 'IRS Whistleblowers,' Surgent's Weekly Expert Hour Webinar Series - August 31, 2023, speaker
- 'High Earners to Lose 401(k) Tax Break,' Surgent's Weekly Expert Hour Webinar Series - August 24, 2023, speaker
- 'The Section 754 Election and Related Adjustments to Inside Basis of Partnership Assets,' The All -Star Tax Series - August 2, 2023, speaker
- 'Tax Issues Related to Buying and Selling a Business,' The All Star Tax Series - July 26, 2023, speaker
- 'Loss Limitations,' Surgent's Weekly Expert Hour Webinar Series - June 14, 2023, speaker
- 'Estate Planning,' Surgent's Weekly Expert Hour Webinar Series - May 31, 2023, speaker
- 'Weekly Tax Update,' Surgent's Weekly Expert Hour Webinar Series - January 19, 2023, speaker
- 'Weekly Expert Update,' Surgent Knowfully Webinar Series - November 17, 2022, speaker
- 'Partnership Distributions and Sales,' Surgent Knowfully Webinar Series - November 3, 2022, speaker
- 'Top Ten Questions re: Section 754,' Surgent Knowfully Webinar Series - October 20, 2022, speaker
- 'Weekly Expert Update,' Surgent Knowfully Webinar Series - September 22, 2022, speaker
- 'Must-Know Rules Relating to IRAs and Qualified Plans for 2022,' Surgent Knowfully Webinar Series - September 12, 2022, speaker
- 'Weekly Expert Update,' Surgent Knowfully Webinar Series - August 11, 2022, speaker
- 'The American Families Plan Tax Compliance Agenda,' Surgent Accounting & Financial Education Expert Hour - May 27, 2021, speaker
- '[Checklist 2020: Moving forward.](#)' Withersworldwide webinar - November 10, 2020, co-presenter
- '[Checklist 2020: Planning for any outcome.](#)' Withersworldwide webinar - October 6, 2020, co-presenter
- 'Estate Planning Opportunities in a Low Interest, Rate and Value Environment,' Withers/Marcum Webinar - June 11, 2020, presenter

- 'Surgent Labor Law & the Cares Act: Navigating Employer Employee Conflicts in Times of Economic Distress,' Surgent Webinar - May 18, 2020, presenter
- 'Opportunity Zones: IRC Sec. 1400Z Two Years On,' South Carolina Association of CPAs webinar - May 15, 2020, presenter
- 'CARES Act Webinar,' Wealthmanagement.com - April 27, 2020, presenter
- 'CARES Act Webinar,' The All Star Tax Series - April 14, 2020, presenter
- 'CARES Act Webinar,' Surgent Webinar - April 8, 2020, presenter
- 'Annual Roundtable Even,' CEG Worldwide - March 12, 2020, speaker
- 'Don't get Capsized by the Blue Wave: Opportunities for Wealth Planning in the Face of Proposed Democratic Tax Policies,' 2020 Forum 400 - January 27, 2020, speaker
- 'Democratic Tax Policies and Planning with Life Insurance,' 2020 Forum 400 - January 25, 2020, speaker
- 'The SECURE Act and tax extenders: What you need to know now to help your clients,' The All Star Tax Series - January 13, 2020, panelist
- 'SECURE Act Panel,' Surgent Webinar - January 6, 2020, panelist
- 'SECURE Act Panel,' Surgent Webinar - December 30, 2019, panelist
- 'Update on Pass-Through Entities After Tax Reform: Corporations, Partnerships, and Limited Liability Companies (PTTR),' The All Star Tax Series - November 14, 2019, speaker
- 'Update on Pass-Through Entities After Tax Reform: Corporations, Partnerships, and Limited Liability Companies (PTTR),' The All Star Tax Series - November 6, 2019, speaker
- 'Tax Practitioner's Guide to Buying or Selling a Business (BYSB),' The All Star Tax Series - October 29, 2019, speaker
- 'Tax Practitioner's Guide to Buying or Selling a Business (BYSB),' The All Star Tax Series - October 23, 2019, speaker
- 'CEG Worldwide Roundtable,' CEG Worldwide - October 17, 2019, speaker
- 'Tax Practitioner's Guide to Buying or Selling a Business (BYSB),' The All Star Tax Series - October 15, 2019, speaker
- 'FSN NYC Mixer and QOZ Update,' YPO Financial Services - April 4, 2019, speaker
- 'Opportunity Zones - Investing with Purpose,' SVN Webinar - February 2019, speaker
- 'Private Placement Life Insurance Symposium,' New York, NY - June 2017, speaker
- 'Presentation to China Merchants Bank,' New York, NY - April 2017, speaker
- 'New First Financial Resources Sales and Marketing Symposium,' Laguna Beach, CA, - March 2017, speaker
- 'U.S. Taxation of Resident and Non-Resident Aliens Q & A,' - November 2016, speaker
- 'New First Financial Resources Board Meeting,' Amelia Island, FL - October 2016, speaker
- 'Latest Estate Planning Ideas and Strategies,' Webinar - October 2016, speaker
- 'Pacific Life Symposium,' - Huntington Beach, CA - September 2016, speaker
- 'How Businesses are Impacted by Gift and Estate Tax Regulations,' - Interview with Barron's - September 2016, speaker
- '2704 Regulations Webinar,' - August 2016, speaker
- 'Advanced Planning Symposium,' - New York, NY - July 2016, speaker
- 'U.S. Taxation of Resident and Non-resident Aliens Webinar,' - July 2016, speaker
- 'Sophisticated Estate Planning for Super High Net Worth Clients Webinar,' - July 2016, speaker
- Charter Financial Publishing Conference, Boston, MA, - October 2015
- Delaware Trust Conference, Wilmington, DE - October 2015
- Inc. Magazine Business Owner's Council, frequent presenter
- Surgent McCoy, frequent presenter
- 3rd Annual Creating an Exceptional Family Office, Boston, MA - September 2014
- 'Retirement Strategies for Wealth Business Owners,' Financial Advisors Magazine, Las Vegas, NV - April 2014
- 'Sourcing and Working with Super-Rich Inheritors,' Rothstein Kass, New York, NY - April 2014

- '2nd Annual Creating an Exceptional Family Office,' Boston, MA - October 2013.
- 'Life Insurance and Charitable Lead Annuity Trusts: Perfect Together!' Newport Beach, CA - March 2013
- 'Private Placement Life Insurance and Charitable Lead Annuity Trusts: Perfect Together!' New York, NY - January 2013
- 'Gift Planning Opportunities in 2012', IMI, Greenwich, CT - December 2012
- 'Planning Opportunities Using Preferred Partnerships', Boston Estate Planning Council, Boston, MA, November - 2012
- 'Estate Planning', Tax University, Rothstein Kass, New York, NY - October, 2012
- '2012 Gifting Strategies', Elite Wealth Management Conference, Boston, MA - October 2012
- 'Creating a Multi-Family Office Conference', New York, NY - May, 2012
- 'Sophisticated Estate Planning', Cromwell, CT - December 2011
- 'Sophisticated Estate Planning', Norwalk, CT - December 2011
- 'Sophisticated Estate Planning', Hamden, CT - December 2011
- 'Protecting the Principals: Estate Planning', Greenwich, CT - November 2011
- 'CBIA Family Business Program', Farmington, CT - October 2011
- 'Cultivating the Super Rich', Forbes/Private Wealth, New York, NY - October 2011
- 'Succession Planning for Business Continuity', Exit Planning Exchange Seminar, Stamford, CT - May 2011
- 'Unique Wealth Transfer Planning Opportunities for Fund Professionals in 2011 and 2012', Greenwich, CT - May 2011.
- 'Window of Opportunity: Saving Taxes in 2011-2012 and Providing for Certainty with Succession Planning', Greenwich, CT - May 2011
- 'Multi-Generational Wealth Planning', NY - March 2011 \_\_
- 'Estate and Wealth Planning in 2011', IvyPlus Event, New York, NY - March 2011
- 'Finding and Working with Affluent Physicians', New York, NY - November 2010
- 'End-of-the Year Power Moves', Speaker, Inc. Magazine, Wayne, NJ and New York, NY - October 2010
- 'Marketing Life Insurance to the Financial Elite', Presenter, New York, NY - October 2010
- 'Estate Freeze Techniques for Family Businesses', Presenter, Merrill Lynch, New York, NY - September 2010
- 'Create a Multi-Family Office Practice', Presenter, Private Wealth, Chicago - July 2010
- 'Tax Efficient Hedge Fund Investing', Family Office Association, Greenwich - July 2010
- 'Sourcing the Super-Rich for Life Insurance', Rothstein Kass, New York, NY - June 2010
- 'Business Succession Planning', Herald Bank, New York, NY - June 2010
- 'The Wealthy Family/Family Office Forum/PPLI', IMI, Greenwich - June 2010
- 'Estate Planning', CLE Presentation, Rothstein Kass, New York, NY - March 2010
- 'Trends in Family Office', Speaker, IvyPlus Event, New York, NY - March 2010
- 'International Aspects of Estate Planning', to the Lower Fairfield County Estate Planning Council - December 2009
- 'FLP Planning with GRATs and Defective Grantor Trusts', to financial professionals in Hong Kong and Singapore - May 2009
- 'Working with Family Offices', Connecticut Chapter of The Alliance for Alternative Asset Professionals - March 2009
- 'Wealth Planning for Hedge Fund Managers', to MARHedge World Wealth Summit, Bermuda - October 2006
- 'Family Offices and Trusts Tax Efficient Cross-Border Planning', to World Offshore Covention, Puerto Rico - October 2005
- 'Succession Planning for Family Offices', to Family Office Business Operations, New York - July 2005

## External publications

'IRS Overstates Abuse in Charity-Geared Trusts, Tax Advisers Say,' Bloomberg Tax - March 26, 2024, quoted

'Lawmakers question Biden budget proposals as tax experts plan ahead,' Accounting Today - March 21, 2024, quoted

'How rich parents pass on their businesses without giving up control – and save big on taxes,' Business Insider - February 14, 2024, quoted

'What is capital gains tax?' CNN Underscored - January 25, 2024, quoted

'Rich parents want to give to charity and leave more money to their kids. Here's how billionaire families do it.' Business Insider - January 23, 2024, quoted

'Long-Term Capital Gains Tax.' CNN Underscored - January 4, 2024, quoted

'Congress Has Little Time to Make Tax Changes This Year,' Accounting Today - November 27, 2023, quoted

'Advisors Are Key to Clients Benefiting From New IRS Rules, Attorney Says,' Financial Advisor - November 20, 2023, quoted

'After the Budget Deal, What's Next for the IRS?,' Accounting Today - June 28, 2023, quoted

'Tax Season So Far: More Service, Lower Refunds,' Accounting Today - February 2, 2023, quoted

'The Biggest Changes for 401(k) Retirement Savers,' Bloomberg News - January 10, 2023, quoted

'The IRS is Preparing for Tax Season. Expect Some Changes.' Barron's - December 29, 2022, quoted

'Ok, But Seriously. Is SECURE 2.0 Going to Pass?' Plan Sponsor - December 12, 2022, quoted

'Here's How to Maximize Your Wealth Over the Next Decade' Barron's - November 24, 2022, quoted

'What is Adjusted Gross Income? How to Calculate It in 2022,' U.S. News and World Report - November 10, 2022, quoted

'What the New IRS Rules Mean for Inherited IRAs,' Forbes Advisor - October 18, 2022, quoted

'More Audits Are on the Way for Taxpayers. How to Respond if You're Targeted,' Barron's - August 17, 2022, quoted

'3 Things State Tax Pros Should Know About the Inflation Act,' Law360 - August 12, 2022, quoted

'Build Back Better Born Again (Sort Of),' Accounting Today - August 2, 2022, quoted

'Hedge Fund and Private Equity Billionaires Say They Support Closing the Carried-interest Tax Loophole. But Behind Closed Doors, Fund Managers Worry What The Manchin-Schumer Deal Means for Their Liquidity,' Insider - July 29, 2022, quoted

'Biden's Tax Hike Proposals Take Aim at Wealthiest Americans. Here's What We Know,' Barron's - March 30, 2022, quoted

'What to know about filing a 2021 income tax return if you own a business,' CNBC - February 19, 2022, quoted

'IRS Having Difficulty Processing Power of Attorney Forms,' Accounting Today - January 20, 2022, quoted

'Opportunity Zones Face Bleak End of Year Deadline,' GlobalSt - December 17, 2021, quoted

'Proposed Tax Changes Focus on the Wealthy,' The New York Times - September 17, 2021, quoted

'Transformative Tax Proposals in Treasury's Green Book,' Accounting Today - June 22, 2021, quoted

'Biden's Capital Gains Tax Increase Proposals Make Tax Planning Tougher,' Accounting Today - June 10, 2021, quoted

'Big Tax Bills to Hit Even Modest Inheritances if Step-up in Basis Narrows,' Financial Planning - June 1, 2021, quoted

'Stepped-Up Basis Repeal Gets Tamer Treatment,' Tax Notes - June 1, 2021, quoted

'American Families Plan to directly impact America's wealthiest individuals,' Withers Insight - May 3, 2021, author

'Biden Calls for Raising Taxes on Capital Gains and Wealthy,' Accounting Today - April 29, 2021, quoted

'Biden's Next Plan Targets Like-Kind Exchanges, Stepped-Up Basis,' Tax Notes - April 29, 2021, quoted

'Advisors to the Wealthy Are Fielding a Frenzy of Calls From Clients Worried About Estate Planning and Taxes. Here's How They're Navigating the Chaos,' Insider - April 29, 2021, quoted

'New York is raising taxes for millionaires. Will other states follow?' CNBC - April 8, 2021, quoted

'New Limits on Exec Comp Tax Deductions Just the Beginning,' Agenda - March 29, 2021, quoted

'IRS Expands Unemployment Tax Exclusion to More Taxpayers,' Accounting Today - March 24, 2021, quoted

*'Relief Bill's 'Straightforward' Exec Comp Tweak Has Issues,'* Tax Notes - March 23, 2021, quoted

*'Accountants Often Advise Clients To File Taxes As Soon As They Can. Why That's Recently Changed,'* CNBC.com - March 16, 2021, quoted

*'3 Questions State Tax Pros Have About the Pandemic Relief Law,'* Law360 - March 16, 2021, quoted

*'Covid relief bill changes tax rules midseason. What to know about filing an amended return+Ad+Hoc+Reports%2fBD+Spend%2fHome+Page,'* CNBC.com - March 10, 2021, quoted

*'Rich Americans Bracing for Higher Taxes Await Biden's First Move,'* Bloomberg News - January 8, 2021, quoted

*'SALT Cap Compromise on the Table in Next Congress,'* Law360 Tax Authority - November 25, 2020, quoted

*'Making Financial Decisions When You Don't Have All the Facts,'* The New York Times - November 20, 2020, quoted

*'Retroactive Tax Hikes Seen as Unlikely Under Biden Administration,'* Tax Notes - November 11, 2020, quoted

*'Rich Americans Are Protecting Their Fortunes From a Possible Biden Win,'* Bloomberg - October 9, 2020, quoted

*'Game plan now for potential higher taxes,'* Accounting Today - August 20, 2020, quoted

*'No Written Plan Relief May Stymie Opportunity Zone Projects,'* Law360 - June 10, 2020, quoted

*'Make the Most of the July 15 Tax Deadline,'* Accounting Today - May 7, 2020, quoted

*'Lawmakers Urge IRS to Rethink Tax-Credit Rule Affecting Furloughed Workers,'* The Wall Street Journal - May 4, 2020, quoted

*'Inside The Federal Response To The Coronavirus Pandemic,'* Accounting Today - April 29, 2020, quoted

*'CARES Act waives RMDs and provides greater access to employee benefits in the wake of coronavirus,'* Withers Insight - April 1, 2020, co-author

*'The Relief Bill Will Send 90% of Americans Some Free Money. The Timeline Is Unclear,'* Barron's - March 27 2020, quoted

*'Planning opportunities during market volatility: Finding the silver lining,'* \_\_ Withers Insight - March 18, 2020

*'Conduit Trust Plans Likely Need Post-SECURE Act Tuneup,'* Law360 - March 13, 2020, co-author

*'SNAP: The stretch just broke - Time to revisit IRA and Qualified Plan Beneficiary Designations,'* Withers Insight - January 28, 2020, co-author

*'Hoping For a Smoother Tax Season,'* Accounting Today- January 2, 2020, quoted

*'Time Is Almost Up For Maximizing This Hot New Tax Play,'* CNBC - December 31, 2019, quoted

*'Qualifying QOZs,'* \_\_ Accounting Today - May 28, 2019, quoted

*'Brokers predict Opportunity Fund investment rush to the Bronx,'* Real Estate Weekly - February 27, 2019, quoted

*'Opportunity Zones Program Takes a Step Forward,'* Commercial Property Executive - February 18, 2019, quoted

*'Update on Connecticut estate and gift tax exemptions for 2019,'* Withers article - February 15, 2019, co-author

*'Window of opportunity with opportunity zones: Top 10 takeaways,'* Bloomberg BNA - November 15. 2018, co-author

*'How to maximize the increased transfer tax exemptions,'* Withers article - February 21, 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

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

<https://www.forbes.com/sites/russalanprince/2017/11/13/the-house-tax-proposal-some-key-implications-for-family-office/#323b8a3278bf>"Forbes" target="blank">'The House tax proposal: Some key implications for family office' - November 13, 2017, quoted

*'The booming business for tax specialists serving the super-rich and family offices,'* Forbes - October 26, 2017, quoted

*'How to transfer appreciating assets to heirs,'* Forbes - October 23, 2017, quoted

*'Three big mistakes many foreign nationals make coming to the United States,'* Forbes - October 16, 2017, quoted

'How foreign Chinese entrepreneurs coming to the US can avoid taxes on selling their companies,' Forbes - September 21, 2017, quoted

'Gain From the Value of a Good Valuation', Probate & Property Magazine - September/October 2014

'Seven Old Ideas, a New Idea and a Crummey Idea: A Review of the 2015 Greenbook's Estate and Gift Tax Provisions', Wealthmanagement.com - March 2014

'Giving That Gives Back', Private Wealth Magazine - May/June 2013

'Keeping What You Make', Private Wealth Magazine - March/April 2013

'The estate planning philosophy of the self-made ultra-affluent', Forbes - July 2011

'Window of Opportunity to Save on Taxes by Implementing Business Succession A Two-Year Window', Private Wealth Magazine - March/April 2011

'Planning For The Modern Family-A Flexible Multi-Generational Approach to Preserving Wealth While Providing For The Family', Private Wealth Magazine - May/June 2009

'FLP Care and Maintenance - Family Offices Are Well Suited For Administering Family Limited Partnerships', Private Wealth Magazine - December 2008/January 2009

'The Resurrection - How Holman Revived Section 2703 Arguments - long thought dead and buried - to defeat a family limited partnership', Trusts and Estates Magazine - October 2008

'Sharing the Wealth', Private Wealth Magazine - June/July 2008

'Protecting the Family Fortune', published 2008 by Campden Media

'Fortune's Fortress A Primer on Wealth Preservation for Hedge Fund Professionals', MARHedge Publication - 2007

'Passing the Baton-Succession Planning Among Ultra-High-Net-Worth Family Businesses', Families in Business - October 2007

'Beneficiary Withdrawal Powers in Grantor Trusts-A Crumm(e)y Idea?', Estate Planning - October 2007

'Section 2703-Keeping Buy/Sell Agreements Intact for Estate Planning and Succession Planning of Family Owned Businesses', Insights Magazine - Autumn 2007

'Eye of the Beholder', Private Wealth - August-September 2007

'Freeze Frame', Private Wealth - June-July 2007

'Intelligent Estate Planning for the Contractor The Business', Construction Accounting and Taxation - March/April 2007

'Defective Thinking', Financial Advisor Magazine - November 2006

'Intelligent Estate Planning for the Contractor The Client Picture', Construction Accounting and Taxation - October 2006

'Sabotaged Don't Let a Buy-Sell Agreement Blow Up an Estate Plan', Trusts & Estates Magazine - April 2006

'Estate Planning for the Contractor', Construction, Accounting and Taxation - April 2006

'Taking the Reins: Insights into the World of Ultra-Wealthy Inheritors', Private Wealth - 2014

'Advanced Estate Planning', Wealth Preservation for Physicians - January 2006

## Admissions

State of Connecticut, 1988

Registered Foreign Lawyer in the UK, 2002

Washington DC, 2003

State of New York, 2004

Commonwealth of Massachusetts, 2007

---

## Education

Syracuse University, B.A.

University of Connecticut School of Law with high honors, J.D.

---

## Languages

English

---

## Memberships

Society of Trust and Estate Practitioners (STEP)

Member, Financial Planning Association

District of Columbia Bar Association

Connecticut Bar Association

American Bar Association

New York Bar Association

---

## Key dates

Year joined: 1991

Year became partner: 1998

---

[View full profile online](#)