Fisher Broyles

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Office: Washington, DC

Practice Areas: Insurance; Tax; Trust & Estates

Bar Admissions: Maryland; DC; Virginia; United States Tax Court

Education: Georgetown University Law Center: LLM (Taxation) 1995; American University, Washington College of Law: 1992 (cum laude); University of Maryland: BS 1988

Experience: Holland & Knight; Patton Boggs (now Squire Patton Boggs)

Gal N. Kaufman serves as co-chair of the firm's Private Client Services Practice Group.

Gal N. Kaufman is highly experienced in the full range of private wealth services matters, including sophisticated tax analysis and planning; structured management arrangements for families, family businesses and family offices; and fiduciary and tax controversies. Mr. Kaufman also is well-versed in advising on issues related to captive insurance.

Representation of Business Owners and High-Net-Worth Families.
Mr. Kaufman has extensive experience representing business owners, with a special emphasis on tax-efficient strategies that enhance the ability of the business owner to maintain the business within the family; or if a sale of the business is the ultimate goal, strategies that maximize the after-tax proceeds to the business owner and the business owner's family. Mr. Kaufman also is well-versed in representing high-net- worth families and the varied legal and tax needs of such families.

International Estate Planning.
In the international realm, Mr. Kaufman advises clients outside the
U.S. with respect to pre-immigration planning, as well as representing U.S.-based clients with assets both inside and outside the U.S.

Captive Insurance Companies.
Mr. Kaufman represents captive management companies, including the country's largest "microcaptive" manager; captive insurance companies; and the owners of captives. He also advises business owners, their companies and captive insurance companies, handling all of the tax and legal aspects of the formation and administration of captive insurance companies, as well as exit strategies.

Representation of Fiduciaries in Dispute Resolution.
Mr. Kaufman assists corporate fiduciaries in potential disputes with the beneficiaries of trusts, with the primary goal of obtaining a resolution favorable to his clients while avoiding litigation whenever possible.

Family Office Services.
Mr. Kaufman works extensively with family offices to assist in the advising and the administration of complex plans for clients. He helps coordinate the valuable efforts of the clients' other advisors, including CPAs, financial advisors and insurance professionals. He also has experience leading the succession of the family hierarchy from generation to generation.

Prenuptial and Postnuptial Agreements, and Tax Planning in Connection with Divorce.
Mr. Kaufman advises clients on the tax, legal and practical aspects of prenuptial and postnuptial agreements. Many of the clients he advises in this regard are business owners and/or members of high net worth families.

Experience

Captive Insurance

- Served as counsel to a very successful captive management company with respect to its international group captive program
- Served as counsel to a business and its owner in structuring the ownership of multiple captives within the business owner's family, using multiple trusts to navigate the attribution rules applicable to certain captives
- Served as counsel to a boutique law firm, representing it in the creation and administration of multiple captive insurance companies, including the eventual exit strategy for one of the partners in the law firm who is retiring

Business Owners and High-Net-Worth Families

- Advised a Washington, D.C.-area government contractor who owned 100 percent of his company on a novel presale income tax planning technique designed to eliminate state income taxation on the eventual sale of the client's company

- Structured, through the use of limited liability companies (LLCs) and irrevocable trusts, a presale planning strategy that moved tens of millions of dollars of wealth outside of the client's estate, despite the client's gift/estate tax exemption having already been used

International Estate Planning

- Providing counsel to a nonresident alien individual who wants to bring tens of millions of dollars into the U.S. for the benefit of his resident alien wife and U.S. citizen daughter, using both trust planning and private placement life insurance

Family Office Services

- Advised a client in the establishment and administration of a single family office, including advising on the hiring of key personnel

Fiduciaries in Dispute Resolution

- Serves as counsel to one of the largest U.S. trust companies with respect to fiduciary litigation matters in Washington, D.C., Maryland and Virginia

Honors & Awards

- The Best Lawyers in America guide, Trusts and Estates, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025
- Top Money Adviser, Washingtonian Magazine, 2014, 2016, 2022

Publications

- Captive Insurance in the Middle Market, Holland & Knight Private Wealth Services Blog, August 1, 2018
- Takeaways From The Tax Court's First Micro-Captive Insurance Ruling, Taxnet Pro, November 2, 2017
- Takeaways from the Tax Court's First Micro-Captive Insurance Ruling, Holland & Knight Alert, October 6, 2017
- Benson Trust Dispute Heads Back to Court, Holland & Knight Private Wealth Services Blog, September 29, 2016

Speaking Engagements

- Captive Insurance for the Middle Market, Holland & Knight Program, July 26, 2018
- Captive Insurance for the Closely Held Business, Holland & Knight Program, June 27, 2018

- Founders' Meeting for Cayman Group Reinsurance Company, Oxford Risk Management Group, February 22-23, 2018
- Succession Planning for Government Contractors, Signature Estate & Investment Advisors, LLC (SEIA), November 8, 2017
- Taxation of their Group Captive, Oxford Risk Management Group's Advisor Summit, June 21, 2017

Memberships

- American University Washington College of Law, Dean's Advisory Council American Bar Association, Section on Real Property, Probate and Trust Law Maryland State Bar Association, Estates and Trusts Section
- District of Columbia Bar Association, Tax Section; Estate Planning Committee Washington, D.C., Estate Planning Council