

## Charles S. Kolstad

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Charles is a partner in the private client, tax and corporate teams.

He focuses his practice on international tax, corporate, and partnership matters. He assists clients in tax and corporate planning relating to the acquisition, disposition and restructuring of businesses, corporations and partnerships both domestically and internationally. Charles frequently advises foreign individuals moving to the U.S. on pre-immigration, income, gift and estate tax planning opportunities. Charles also focuses his practice on the cannabis industry/cannabusiness, crypto assets and block chain technology, and tax issues related to initial coin offerings (ICOs).

In addition, he advises DJs, actors and actresses, musicians, songwriters, producers, directors and financiers, both domestic and foreign, on a wide range of individual and corporate tax issues, specific to the entertainment industry. Charles has written several articles and given many presentations on entertainment tax issues.

He has advised over 200 clients with unreported foreign financial accounts, foreign trusts, and other foreign investments, on the filing of FBARs and other information returns, and whether participating in the IRS's various offshore voluntary disclosure programs is appropriate. Charles has written and lectured on the extensive information reporting requirements for U.S. taxpayers with international business operations.

Charles has extensive experience in representing clients during audits by the IRS or the California Franchise Tax Board, as well as in front of the IRS Appeals Office or IRS Collection.

Charles is recognized as a "key lawyer" by The Legal 500 US in 2020 in the area of international tax.

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SECRETARY **KATHY WHITE**

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### ADMISSIONS

■ New York 1980

■ California 1992

### PUBLICATIONS

*'Federal Banks Get OK to Provide Services for Crypto Assets.'* Bloomberg Law - August 20, 2020, co-author

*'Your lenders have called – What should you do now? Insights for US businesses navigating the impact of the coronavirus.'* Withers Insight - May 5, 2020, co-author

*'Coronavirus impact on US international tax compliance.'* Withers Insight - March 27, 2020, co-author

*'IRS enforcement efforts target taxes on cryptocurrency transactions.'* Accounting Today, September 9, 2019, co-author

*'Cryptocurrencies and the IRS: What you need to know.'* Withers Insight, August 06, 2019, co-author

'Death, disability and divorce – drafting agreements with trusts as parties in light of Han v. Hallberg,' Withers Insight, July 2, 2019

'A Royal Dilemma: Prince Harry and Meghan's Baby Liable for U.S. Taxes,' Wealthmanagement.com, May 8, 2019, quoted

'Withers Adds Trust, Int'l Tax Attys From Mitchell Silberberg,' February 2019, quoted

'Withers Expands LA Practice as 3 Local Attorneys Seek Global Reach,' The Recorder, February 2019, quoted

'Withers' US growth continues with addition of corporate, income tax and estate planning team in California,' Withers Insight, February 14, 2019, quoted

'ICOs and How Much Taxable Income They Generate,' Accounting Today, May 30, 2018

'United States Chapter, Getting the Deal Through Outsourcing,' Law Business Research Ltd, 2014

'Estate and Tax Guidance for Artists and Collectors,' Los Angeles Lawyer, 30th Annual Entertainment Law Issue, May 2014

'Time to Revisit Foreigner Investing in U.S. Real Estate,' Law360, November 22, 2013

'How the Health Care Act Affects the Taxation of Loan-Out Corporations,' Los Angeles Lawyer, 29th Annual Entertainment Law Issue, May 2013

'FATCA and NFFEs,' Economic Daily News (Taiwan), March 13, 2012

'The IRS' Amnesty Program for Foreign Account Holders: What You Need to Know,' The Wrap , August 8, 2011, author

'International Reporting Requirements for CPAs and Their Clients,' Accounting Today, March 24, 2011, author

'Comments on the Foreign Account Tax Compliance Act (FATCA),' American Bar Association, February 14, 2011, co-author

'Before You Say Yes and Move Abroad - Six Legal Issues to Consider,' Financier Worldwide - Global Reference Guide: Employment & Human Resources 2010, November 2010

'Tax Issues Associated with Carbon Trading Assets and the Impact of Proposed Legislation,' ABA Carbon Trading and Energy Finance Committee Newsletter, April 2010

'Section 181 Offers Incentives to Curb Runaway Productions,' Los Angeles Lawyer, 25th Annual Entertainment Law Issue, May 2009, co-author

'Unresolved Issues in the Income Forecast Method of Accounting,' Los Angeles Lawyer, 23rd Annual Entertainment Law Issue, May 2007, co-author

## MEMBERSHIPS

- Board of Directors, Temple Emanuel of Beverly Hills

## TALKS

'Tax and accounting toolbox for recording and touring artists and the attorneys that represent them,' EASL MBLC 2020 Conference: Music Industry 2020 (webinar) - November 6, 2020, presenter

'Been in the U.S. and Now Heading Overseas? How Will this Impact Your Estate & Tax Planning?' Los Angeles Inbound Wealth Planning Council

webinar - August 20, 2020, co-presenter

*'Tax and Estate Planning for US Persons with Foreign Assets,'* Los Angeles County Bar Association - August 4, 2020, co-presenter

*'How to set up a family office for success,'* Withers event, San Diego, CA - February 25, 2020, panelist

*'Family Office Operations 2020: New Ideas,'* Wealth management firm-hosted event - January 24, 2020, speaker

*PrimeGlobal Annual Tax Conference: Intellectual Property & TCJA 2017: What do you do now?,'* January 12, 2020, presenter

*Family Office Operations 2019: New Ideas, Large financial institution event, November 19, 2019, co-presenter*

*How IP Intersects with Employment, Estate and Bankruptcy Law, IP Without Borders: California Lawyers Association 44<sup>th</sup> Annual Intellectual Property Law Section Institute, November 18, 2019, co-presenter*

*'Family Office Operations 2019: New Ideas,' Large financial institution event - September 25, 2019, co-presenter*

*Working with the final GILTI regulations, STEP Los Angeles, September 10, 2019*

*Avicii & Non Doms, What Have We Learned, December 2018*

*It's a Mess: What Happens When You Don't Pay Attention When Your Clients Are Cross Borders, June 20, 2018*

*Section 951A - Global Intangible Low-Taxed Income ( GILTI) Webinar, April 24, 2018*

*Tax Planning for Disregarded Entities: Issues, Risks, and Opportunities Webinar, Spring 2018*

*Tax Treatment of Pre-2018 Accumulated Earnings Webinar, Winter 2018*

*Form 3520 Foreign Trust Reporting: Filing Deadlines, Requirements, and Liabilities Webinar, Fall 2017*

*Form 8865 Reporting of Foreign Partnership Income and Navigating Rules for Allocable Share of Foreign Income Webinar, August 3, 2017*

*Form 8865 - Reporting of Foreign Partnership Income, August 3, 2017, webinar*

*International Tax Forms and Reporting Requirements Webinar, Winter 2017*

*Fundamentals of Foreign Trust Administration Webinar, June 14, 2016*

*Form 8865: Reporting Foreign Partnership Income and Navigating Rules for Allocable Share of Foreign Income Webinar, December 1, 2015*

*Corporate Inversions: Liabilities and Expectations Webinar Spring 2015*

*State Taxation of Income From Foreign Affiliates, March 11, 2015, webinar*

*Fundamentals of Foreign Trust Administration, March 11, 2015, webinar*

*Engaging Accountants and Tax Attorneys in Multiple Jurisdictions, January 21, 2015*

*International Tax Forms and Reporting Requirements, January 7, 2015*

*Cross-Border Money Transfers: Key Requirements Every U.S.-Based Nonprofit Needs to Know, November 19, 2014*

*Fundamentals of Foreign Trust Administration, November 5, 2014, webinar*

*Form 8865: Reporting Foreign Partnership Income, September 23, 2014, webinar*

*Cross-Border Money Transfers: Key Requirements and Pitfalls Every U.S.-Based Nonprofit Needs to Know, September 13, 2014*

*Bitcoin: Legal Fee or Foe?, August 21, 2014*

*Pre-Immigration Tax Planning for Foreign Clients, July 7, 2014*

*International Information Reporting: CFCs, PFICs, FBARs & Beyond, May 29, 2014*

*State Taxation of Income From Foreign Affiliates, February 12, 2014*

*Engaging Accountants and Tax Attorneys in Various Jurisdictions, December 10, 2013*

*Legal Quick Hit: "Your Nonprofit Has Gone Global: Now What Are Your U.S. and Foreign Tax Compliance and Reporting Obligations?"; November 13, 2013*

*Form 8865 - Foreign Partnership Income, November 8, 2013, webinar*

## **EDUCATION**

University of Notre Dame, Law School, J.D. 1979  
Columbia University, M.B.A., 1978  
University of Villanova, B.S., Mathematics, cum laude, 1975

## **LANGUAGES**

ENGLISH

## **DATES**

JOINED: 2019  
PARTNER: 2019

## **RECOGNITION**

CSK 2020 Legal 500 US Leading Individual 2020

Los Angeles

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