DOWNEYBRAND

Silvio Reggiardo, III
Partner

621 Capitol Mall | 18th Floor
Sacramento, CA 95814

916.520.5374 | Direct
sreggiardo@downeybrand.com

Practice Areas

Corporate Law | Real Estate | Taxation | Wealth Transfer

Sil Reggiardo assists clients in structuring business transactions and wealth transfers.

Many of Sil's projects are tax sensitive. His clients include closely-held businesses and individuals. Sil is an adept communicator and has a natural ability to connect with his clients.

Sil constantly strives to improve. Nearly thirty years after graduating from law school, he received a graduate tax law degree. Before joining Downey Brand in 1990, Sil worked with the international accounting firm of Ernst & Young in San Francisco. He is a California CPA (inactive).

Sil has been a Downey Brand Partner since 1999.

Experience

Estate Planning and Trust Administration

- Advises clients in estate planning matters ranging from standard revocable trusts to complex estate freezes and multi-generational transfers. He structures wealth transfers designed to address valuation discounts, basis adjustments, and transfer tax exemptions.
- Helps clients administer estates and trusts. This can include preparing transfer documents and estate tax returns, making post-mortem asset allocations, and making tax elections.
- Clients often need to put matters before a court, not just for probates but also for contested trust administrations or the amendment of irrevocable trusts. Sil guides clients through that process, which often requires court appearances.
- Advises clients in structuring transactions and settlements in a tax-efficient manner. For example, he structured a settlement to produce a non-taxable basis recovery rather than a taxable gain, and structured a land improvement project to fit within certain tax-deferred like-kind exchange parking guidelines.

Tax Planning

- Advises clients regarding the tax effect of entity and real estate transactions.

Choice of Entity

- Clients often need advice regarding whether to form an entity for business operations and, if so, what type of entity to use (e.g., corporation, partnership or limited liability company). Sil advises clients regarding those decisions and, where applicable, regarding tax allocation provisions of joint venture agreements.

Outside General Counsel

- Serves as outside general counsel for clients running closely-held businesses that need general business law advice, agreements, correspondence and other documentation.

Professional & Community Service

- Certified Public Account, California (inactive)
- American College of Trust and Estate Counsel (ACTEC), Fellow
- American College of Tax Counsel (ACTC), Fellow
- Sacramento County Bar Association; Former President; Former Pro Bono Committee Chair; Former Tax Section Chair
- Sacramento Estate Planning Council, Former Board Member; Former Technical Forum Chair; Former Technical Developments Committee Chair
- California Lawyers Association, Estate Planning, Trust and Probate Section, Former Executive Committee Member, Chair of the Estate Planning and Legislation subcommittees
- Colorado State Bar, Member
- El Dorado Community Foundation, Planned Giving Committee Member
- University of California at Davis School of Law, Visiting Lecturer at Estate Planning and Taxation of Estate Planning, 2016-2018

Education

- E-LL.M., Taxation, New York University, 2012
- J.D., *cum laude*, University of California College of the Law, San Francisco (formerly University of California, Hastings College of the Law), 1987
- B.S., Finance, San Jose State University, 1984

Honors & Rankings

- AV Preeminent® Rating by Martindale-Hubbell®
- Best Lawyers® 2021 Tax Law “Lawyer of the Year” in Sacramento
- Best Lawyers in America©, Tax Law, 2018-2024
- California State Bar Certified Specialist, Estate Planning, Trust & Probate Law
- California State Bar Certified Specialist, Tax Law
- *Super Lawyers*, Northern California Super Lawyers, Estate Planning & Probate, 2004, 2006-2023
- *Sacramento Magazine*, Top Lawyer, Business/Corporate, Estate Planning & Probate, Tax Law, 2015-2023
- *Sacramento Business Journal*, Best of the Bar, 2017-2018
- American Jurisprudence Award
- Internship, Justice John E. Benson, California First District Court of Appeal
- Order of the Coif, 1987
- Thurston Society

Speaking Engagements / Events

- *So, it turns out the family business and its real estate will be owned by different people. Now what?*, Speaker, Capital Region Family Business Center Generations Conference, May 8, 2023
- *SECURE Act Planning for Retirement Plans in Trusts*, El Dorado Community Foundation, December 3, 2020
- *Partnership Basics II: Drafting Partnership Allocations*, Co-instructor, CalCPA Webcast Event, November 19, 2019
- *Embracing Change: Tax Law and Estate Planning*, Co-Presenter, El Dorado Community Foundation 2018 Professional Advisors Forum, May 24, 2018
- *Tax and Charitable Strategies for 2018*, Co-Presenter, Mercy Foundation, May 23, 2018
- *Death and Taxes are Certain, Divorce is Possible, and Business is Unpredictable - Are You Prepared?*, Co-Presenter, Capital Region Family Business Center's 2018 Annual Generations Conference, January 29-30, 2018
- *New Digital Assets Law and Potential New Tax Law Changes*, Co-presenter, Crocker Art Museum Estate Planning Seminar, August 3, 2017
- *Estate Planning After ATRA*, Presenter, El Dorado Community Foundation Professional Advisors Forum, May 21, 2015
- *After the Fiscal Cliff: Estate Planning for Real Estate*, Presenter , CalCPA Sacramento Chapter Real Estate Conference, 2014
- *Keeping the Family Farm in the Family - Part 3*, Downey Brand and Westmark Group Program, October 29, 2013

- *Keeping the Family Farm in the Family - Part 2*, Downey Brand and Westmark Group Program, May 16, 2013
- *Keeping the Family Farm in the Family - Part 1*, Downey Brand and Westmark Group Program, March 28, 2013

Publications

- *Valuation Discounts in Modern Estate Planning*, California Grocer, Issue 5, November 2018
- *Tax Law Uncertainty Should Not Delay Your Estate Planning*, Sacramento Business Journal, October 20, 2017
- *Family Farm and Ranch Business Succession*, Inside the Minds: Family and Business Succession Planning, 2016 Ed., Aspatore Books, April 2016
- *Avoiding Valuation Discounts to Preserve Income Tax Basis for the "Small" Estate*, Inside the Minds: Family and Business Succession Planning, 2014 Ed., Aspatore Books, February 2014
- *Special Needs Trusts Help Disabled Beneficiaries Think Charitably This Holiday Season*, Pathways, A Trust and Estate Newsletter from Downey Brand, Fall 2010
- *New Law Impacts No-Contest Clauses; Why Wills Matter: Estranged Father Inherits from Son He Never Met; Update Your Beneficiary Designations*, Pathways, A Trust and Estate Newsletter from Downey Brand, Spring 2009

Legal Alerts

- *Small Adjustments to Estate Plans Can Save Income Tax Without Triggering Estate Tax*, July 27, 2015

Blogs

- *Play It Again: No Contest Clauses Must Be Referenced In Each California Trust Amendment*, November 19, 2017