

Stephen Putnoki-Higgins

He/Him

PARTNER

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Office: Tampa



Personable, thorough and meticulous in his approach, Stephen is focused on protecting hard-earned family wealth through careful estate and tax planning.

Having an in-depth understanding of estate, tax, and trust planning matters, Steve focuses his practice on combining compassion and innovative strategies to meet the tax, estate planning, business planning, and estate administration needs of sophisticated individuals and their families.

Steve guides his clients in achieving their tax and non-tax goals, such as probate avoidance and the preservation of familial harmony. He regularly assists high-net worth clients and other individuals, including owners of closely-held businesses and other professionals, with transfer tax planning by utilizing cutting-edge strategies, like trust modification and decanting, dynastic trusts, self-settled domestic asset protection trusts, establishing private/family trust companies, gift-sales to grantor trusts, insurance trusts, grantor retained annuity trusts, and the like, to accomplish his clients' goals.

Steve is highly experienced in assisting fiduciaries and beneficiaries through all aspects of the estate administration process, including probate, contested estates, tax, and post-mortem estate planning matters. He regularly advises clients in income, estate, gift and generation-skipping transfer taxation

PRACTICES & INDUSTRIES

Income Tax
Nonprofit Organizations, Charitable Planning & Foundations
Tax, Trusts & Estates

ADMISSIONS

Connecticut
Florida
New York
West Virginia

EDUCATION

University of Connecticut, J.D., *with honors*, 2010
New York University, LL.M. in Taxation, 2011
University of Connecticut, B.A., 2007

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matters and all aspects of wealth transmission, including lifetime gifting strategies, estate and trust administration, charitable giving, and the management and succession of closely-held businesses.

In addition, Steve advises on matters regarding charitable giving and the formation of tax-exempt organizations and other nonprofit entities, in addition to advising on the compliance, structural, operational and governance-related matters his clients face when administering these entities.

EXPERIENCE

Prepared tax-efficient estate planning documents for high-net-worth couple where one spouse moved to Florida and obtained residency there for tax purposes while other spouse remained a resident in New York State for state tax purposes.

Assisted high-net-worth client with contested gift-sale of multiple entity interests to grantor trust in exchange for promissory note.

Assisted high-net-worth client with buyouts and consolidated sale to venture capital group of roughly a dozen fitness centers.

Obtained zero tax due ruling from Scandinavian tax authorities based on recommended treaty position with respect to the estate of a dual citizen who died while residing in Finland.

Prepared self-settled domestic asset protection trusts as part of strategy for reducing capital gains from sale of clients' interests in qualified small business stock.

Played significant role within team that's responsible for the drafting and enactment of the West Virginia Private Trust Company Act.

RECOGNITIONS

Selected to the *Best Lawyers: Ones to Watch[®] in America* list, 2024, 2025

Martindale-Hubbell[®], Platinum Client Champion, 2023

Super Lawyers Rising Star, Estate Planning and Probate, 2023

Avvo Clients' Choice Award, 2020-2021

PROFESSIONAL & CIVIC ACTIVITIES

New York Bar Association

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American Bar Association

- Real Property, Trust & Estate Law Section, Former Member
- Taxation Section, Former Member

Connecticut Bar Association

- Estates and Probate Section
- Tax Section

Florida Bar Association

- Real Property, Trust & Estate Law Section
- Tax Section
- Notary Public, State of Florida

NEWS

Higgins and Weintraub Discuss Advantages of West Virginia's Private Trust Company Act in *Tax Notes State*
10.07.2024

Best Lawyers in America Recognizes 32 Stinson Attorneys as "Ones to Watch"
08.17.2023

Steve Higgins Selected to 2023 Florida Rising Stars List
06.26.2023

Tampa Bay Business Journal, Local News Media Highlight Stinson's New Downtown Tampa Office
05.31.2023

Stinson Enters Southeast Region with Opening of Tampa Office
05.24.2023

SPEAKING ENGAGEMENTS

Presenter, "2016 Ullman Year in Review: Estate & Gift Tax Update," Fla. Bar Tax Section Annual Meeting, Amelia Island, Fla., July 2016

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PUBLICATIONS

"Almost Heaven: West Virginia Enters the Private Trust Company Fray," *Tax Notes State*, September 2024

"Morrissette II Case a Jagged Little Pill," *WealthManagement.com*, 2021

"IRS Rules Merged Trust Qualified as 'See-Through'," *WealthManagement.com*, September 2020

"Trustee-to-Trustee Transfer Didn't Disqualify IRA: PLR Clarifies Rules Concerning IRAs When Nonindividual Beneficiaries Are Involved," *WealthManagement.com*, November 2019

"CRUT Doesn't Qualify as Tax-Exempt Under IRC Section 501(c)(3): Organizational and Operational Tests Deemed Unmet," *WealthManagement.com*, September 2019

"Proceeds of ILIT Policy Not Included in Trustee-Beneficiary's Estate: No Incidents of Ownership Retained Post-Modification," *WealthManagement.com*, May 2019

"Estate's Heirs Liable for Unpaid Federal Estate Taxes," *WealthManagement.com*, April 2019

"Marital Trust Division a Non-Recognition Event, says IRS, but Transfer Tax Implications Abound," *WealthManagement.com*, September 12, 2018

"No Attorney's Fees After Estate Successfully Avoids Penalties," *WealthManagement.com*, May 2017

"Trust Didn't Qualify as a CRT, says IRS," *WealthManagement.com*, 2017

"Deductibility of Claims Against an Estate: A Recent Ninth Circuit Decision Determines that Post-Death Events are Relevant," *WealthManagement.com*, 2014

Co-Author, "Gift Planning With Formula Clauses," *Procter's Progeny to Wandry World (Part 2)*, 28 *Probate & Prop.* 2, at pp. 37-42, 2014

Co-Author, "Gift Planning With Formula Clauses," *Procter's Progeny to Wandry World (Part 1)*, 28 *Probate & Prop.* 1, at pp. 53-57, 2014

"Practical Gift Funding Issues When Planning with Hard-to-Value Assets," *Connecticut Bar Association Estates & Probate Newsletter*, May 2013