



Kenneth K. Bezozo

Senior Counsel

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PRACTICES Tax, Corporate Tax, Restructuring, Private Clients and Estate Planning, Family Wealth and Estate Planning, Tax Controversy, Private Equity

Ken Bezozo has extensive experience in representing companies and individuals in business planning and taxation matters including structurings, formations, operations, acquisitions, mergers, restructurings, dispositions, family business separations, bankruptcies and workouts. He also has substantial experience in handling all types of federal and state tax controversies and tax litigation.

Ken is a frequent speaker on business transactions and taxation law topics including business structurings and formations, mergers and acquisitions, restructurings and recapitalizations, federal taxation issues affecting businesses, state tax planning for business entities, taxation of bankruptcy and workout-related tax issues.

Selected Publications and Speeches

- "Taxation issues in Mergers & Acquisitions Transactions," speaker, CPAmerica Tax Conference, November 4, 2011.
 - "Tax Aspects of Bankruptcy, Troubled Debt Restructuring, and Getting the Most out of Insolvency," speaker, CPAmerica Tax Conference, November 9, 2010.
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QUALIFICATIONS

EDUCATION

- J.D., Benjamin N. Cardozo School of Law, 1980, *cum laude*
- LL.M., Taxation, New York University School of Law, 1981
- B.A., Syracuse University, 1977, *cum laude*

ADMISSIONS

- New York
 - Texas
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PROFESSIONAL AFFILIATIONS AND ENGAGEMENTS

- American Bar Association, Section of Taxation, Corporate Tax Committee, Section of Business Law
 - State Bar of New York, Taxation Section
 - State Bar of Texas, Section of Taxation
 - Former Chairperson, Corporate Tax Committee, State Bar of Texas
 - Former Chairperson - Section 108 Task Force, Bankruptcy Subcommittee of Corporate Tax Committee, American Bar Association
 - Former Vice Chairperson and Council Member, Tax Section, Dallas Bar Association
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SELECTED CLIENT REPRESENTATIONS

- Entity formations and tax efficient structurings.
 - Taxable and tax-free acquisitions, mergers, restructurings and dispositions.
 - Complex tax-free reorganizations, recapitalizations and workouts.
 - Roll-up of numerous business entities into a pre-IPO business unit.
 - Entity structurings and restructurings to minimize state franchise and sales and use tax liability.
 - Analyze complex federal and state tax issues in insolvency, bankruptcy and workout transactions.
 - Mr. Bezozo also has represented taxpayers in hundreds of federal and state tax controversies, including: Audits, appeals and tax hearings relating to audits, examinations, liens and levies, collection matters, etc.; Tax litigation at the state and federal levels, including with the Texas Comptroller, IRS District Counsel and the U.S. Department of Justice; Voluntary disclosures (including offshore voluntary disclosures under the IRS's OVDI program) of unreported income and property to the IRS and state tax authorities.
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AWARDS AND RECOGNITIONS

- Recognized in *New York Super Lawyers*, Thomson Reuters, 2014-2019
- Recognized as a Stand-out Lawyer, Acritas Stars, 2019-2021
- *Martindale Hubbell® Law Directory* with a Peer Review Rating of AV® Preeminent™
- Recognized in *Texas Super Lawyers*, Thomson Reuters, 2002-2005
- Named in *Euromoney Guide to the Leading U.S. Tax Lawyers*, Euromoney Institutional Investor PLC, 2003-2005