



Billy Abbott

Partner

Silicon Valley

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Billy Abbott advises clients on tax matters arising from private and public mergers and acquisitions, asset management funds, digital assets, complex cross-border structuring and more.

He represents a wide range of enterprises, including start-ups, large multinational corporations, financial institutions, private equity, real estate, and other investment funds, sovereign wealth and foreign pension funds, financial technology creators and investors, among others. A talented and versatile corporate tax lawyer, Billy is a trusted advisor to his clients who appreciate his collaborative approach, his broad and deep technical expertise and his ability to distill complex tax matters into clear and helpful guidance. Billy is also committed to pro bono efforts, primarily assisting non-profit organizations apply for tax exempt status and manage their corporate concerns in a range of fields, from education to criminal justice to supporting the LGBTQ+ community.

Experience

M&A Transactions

- Represents numerous private equity clients in portfolio company investments, acquisitions and dispositions
- Represents public and private companies in acquisitions of corporations, partnerships, LLCs and other businesses
- Represented CJ ENM in its acquisition of Endeavor Content
- Represented HID Global Corporation in numerous acquisitions including of Crossmatch and Mercury Security
- Represented DigitalGlobe in its US\$3.6 billion Sale to MDA

Admissions

Bar Admissions

California

New York

Education

Stanford University, J.D.: Senior Production Editor, Executive Board, *Stanford Law Review*

College of William and Mary, B.A., Government and Mathematics: *summa cum laude*

Asset Management

- Advises sovereign wealth funds and foreign pension funds on US tax matters relating to their investments into private equity and other investment funds
- Advises private equity and venture capital funds on fund structuring and other US tax matters for formation, secondary acquisitions and transfers and portfolio company management
- Advises on Qualified Opportunity Zone structuring and investment matters

Financial Technology and Emerging Companies

- Advises cutting-edge cryptocurrency and digital asset companies and investment funds on their US tax strategies
- Advises early stage companies and their investors on critical tax structuring concerns, including complex preferred stock offerings and qualified small business stock issues

Other Tax Matters

- Represented numerous companies and underwriters on listings with US and Hong Kong stock exchanges, including Tiger Brokers in their US\$183 million offering on Nasdaq and the underwriters for the US\$145 million listing by Shanghai HeartCare Medical Technology Corporation Limited on the HKSE
- Represented a leading US company in tax-related litigation before the European Commission

Professional Activities

Speaking Engagements

- “IRS Final Regulations on FIRPTA Exemption for Qualified Foreign Pension Funds,” Strafford Webinars (March 2023)
- “Blockchain and Beyond: The Interaction Between Distributed Ledger Technology and the Law”, Chapman Law School (January 2023)
- “Decentralized Automated Organizations (DAOs): Practical Applications and Legal Framework,” Practising Law Institute (November 2022)
- “Carried Interest After the TCJA: New Rules and Potential Solutions,” Oregon Tax Institute (September 2020)
- “Carried Interests After TCJA,” USC Gould School of Law 2019 Tax Institute (January 2019)

Author

- “The Anything Asset: The Tax Classification of Cryptocurrency, NFTs, DAOs and Other Digital Assets,” Chapman Law Review, Volume 26 (forthcoming May 2023)
- “How to Mitigate the Effects of DOMA on State Tax Filing,” State Tax Notes (August 1, 2010)

Co-Author

- “Decentralized Autonomous Organizations (DAOs): Overview,” Thomson Reuters Practical Law (November 29, 2022)
- “Calif. Tax on Asset Manager Fees Would Have Wide Reach,” Law360 (July 17, 2015)

Clerkships

- The Honorable Mary Ann Cohen, US Tax Court

Honors & Awards

- Recommended by *The Legal 500 US* in Tax