



Thomas M. Bounty

Curriculum Vitae

Thomas M. Bounty represents high net worth individuals and family offices in the design and implementation of sophisticated planning involving the use of domestic and international life insurance and annuities, while facilitating both legacy and charitable planning goals. Additionally, by drawing on decades of experience as an insurance executive, as well as his legal experience and training, Mr. Bounty is uniquely positioned to advise participants in the life insurance and annuity marketplace. He represents asset managers in the establishment of insurance dedicated funds for the private placement marketplace, counsels brokers about incorporating private placement life insurance and annuities into their practices, and advises insurance companies with regard to their policy-related documentation and other operational matters. Mr. Bounty also advises clients on corporate matters and transactions primarily in the field of financial services.

Mr. Bounty is a frequent speaker at continuing education forums and industry and family office conferences on the subject of private placement life insurance and annuities, with particular focus on the structure and tax treatment of investment vehicles utilized in the private placement life insurance and annuity realm.

Mr. Bounty began his legal career as a law clerk for the Chief Judge of the U.S. District Court, District of Connecticut, and then as an associate with the Hartford law firm of Shipman & Goodwin. After several years, he moved in-house and held several different positions within the internal legal departments of major insurance carriers, including Travelers, Aetna and Sun Life of Canada (U.S.). In 2002, Tom served as the in-house counsel and taxpayer representative with regard to PLR 200244001, which ultimately led to the issuance of Rev. Rul. 2003-91 and Rev. Rul. 2003-92. In these rulings, the IRS clarified the appropriate tax treatment of various investment structures used within private placement insurance products. Following those rulings, Mr. Bounty has focused his efforts exclusively on private placement variable insurance product development and transactions, serving as Managing Director of the Private client Group at MassMutual Financial Group (2004-2012) and Vice President, Private Banking Solutions with Zurich American Life Insurance Company (2013).

Education

University of Connecticut, School of Law (J.D. with highest honors, 1982)

Keene State College (B.A. *magna cum laude*, American Studies, 1979)

Professional Affiliations and Honors

American Bar Association

- *Business Law Section*
- *Taxation Section*

State Bar of Connecticut (1982)

(*not admitted to The State Bar of Texas*)

Professional Publication

"Due process: Preclusion of Nonparties," Student Paper of Distinction, University of Connecticut, School of Law (January 1982)

Professional Presentations (Selected)

“How to Structure an Investment using a PPLI Policy to Achieve the Desired Results,” IIR and IBC 5th Annual Event (Europe): Private Placement Life Insurance (PPLI) and Annuities (PPVA) (London, England; May 2014)

“Private Placement Life Insurance: Income and Estate Tax Planning for Wealthy Families,” American Law Institute – American Bar Association Section of Real Property, Trust & Estate Law (e-CPE Course/Webinar; February 2014)

“Anatomy of a Deal,” IIR 11th Annual Event: Alternative Investing Through Life Insurance and Annuities (Washington, DC; June 2013)

“Private Placement Life Insurance,” Opal Financial Group Annual Event: Family Office & Private Wealth Management Forum (July 2011)

“Is There an Increased Interest in PPVAs?,” IIR 9th Annual Event: Alternative Investing Through Life Insurance and Annuities (Chicago, Illinois; June 2011)

“Alternative Investing Through Life Insurance,” Opal Financial Group 15th Annual Event: Alternative Investing Summit (Laguna Niguel, Dana Point, California; December 2010)

“IIR 8th Annual Event: Alternative Investing Through Life Insurance and Annuities (2010) (Chairperson and Speaker) (Chicago, Illinois; June 2010)

“Evaluating the Future of Investor Control: What Can We Expect from the IRS Next?,” IIR 7th Annual Event: Alternative Investing Through Life Insurance and Annuities (Miami, Florida; February 2009) (Co-Chairperson and Speaker)

“Lessons from the Field: Protecting your Clients from Diversification Failures and Investor Control,” IIR 6th Annual Event: Alternative Investing through Life Insurance and Annuities (Miami, Florida; February 2008)

“Investor Control In Depth: analysis with Case Examples,” IIR 5th Annual Event: Alternative Investing through Life Insurance and Annuities (Miami, Florida; February 2007)

“Trends and Developments in Private Placement Life Insurance: Industry Update and Progress Report,” IIR 4th Annual Event: Hedge Fund Investing through Life Insurance and Annuities (Coconut Grove, Florida; February 2006)

“Buyer/Seller Roundtable: Expanding Sales Opportunities for PPLI,” IBC 3rd Annual National event: Hedge Fund Investing through Life Insurance and Annuities (New York, New York; June 2005)

Contact Information

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