

C. Wells Hall, III

Partner

301 S. College Street
23rd Floor
Charlotte, NC 28202

T 704.417.3206
F 704.377.4814

wells.hall@nelsonmullins.com



Wells advises clients on the federal, state, and multi-state tax aspects of acquisitions, reorganizations, restructuring of business entities, and private equity transactions, and estate and gift tax planning in connection with such transactions.

Experience

The following is a selected sampling of matters and is provided for informational purposes only. Past success does not indicate the likelihood of success in any future matter.

Experience

- Handled tax structuring and planning for significant transactions involving pass-through entities, including merger and acquisition transactions when an S corporation or LLC is the target. Much of his legal experience has been involved in the finance, healthcare, and real estate sectors.
- Advised sponsors of real estate investment funds, including limited partnerships, limited liability companies, real estate investment trusts, UPREITs, and combined fund structures on complex tax and structure matters.
- Advised entrepreneurs, startups, and venture capital investors on structure, choice of entity, and qualification for qualified small business stock treatment under Section 1202 of Internal Revenue Code.
- Represented taxpayers before the Internal Revenue Service, the North Carolina Department of Revenue, the North Carolina Employment Security Commission, and Tax Commissions of multiple states in individual and corporate tax audits and appeals.
- Participated in preparation of comments by the ABA Section of Taxation regarding the need for published guidance and proposed regulations with respect to the scope of a specified service trade or business within the meaning of new section 199A and proposed Treasury Regulations under Section 1411 of the Internal Revenue Code (net investment income tax).

Recognitions

Education

Duke University School of Law, JD
(1973)

- Editor in Chief, Duke Legal Research Program

North Carolina State University, BS,
with honors (1970)

- Dean's List
- Phi Beta Kappa

Admissions

North Carolina

South Carolina

Supreme Court of the United States

U.S. Court of Appeals for the District of
Columbia Circuit

U.S. Court of Appeals for the Second
Circuit

U.S. Court of Appeals for the Fourth Circuit

U.S. Court of Federal Claims

U.S. District Court for the Middle District of
North Carolina

U.S. District Court for the Western District
of North Carolina

U.S. Tax Court

The bar rules of some states require that the standards for an attorney's inclusion in certain public accolades or recognitions be provided. When such accolades or recognitions are listed, a hyperlink is provided that leads to a description of the respective selection methodology.

- [The Best Lawyers in America®](#), Tax Law (2017–2026); Trusts and Estates (2017–2020)
- Life Achievement and Service Award Recipient, North Carolina Bar Association Tax Section (2023)
- [Chambers USA: America's Leading Lawyers for Business](#) Tax – North Carolina (2020–2025)
- [Business North Carolina Magazine Legal Elite](#)— Tax and Estates (2012, 2014, 2015, 2021, 2024)
- [Martindale-Hubbell® AV Preeminent®, Peer Rated for Highest Level of Professional Excellence; Distinguished, Peer Rated for High Professional Achievement](#)(AV rated since 1985)
- [N.C. Pro Bono Honor Society](#)— N.C. Pro Bono Resource Center (2017–2020)
- [North Carolina Super Lawyers](#)— Tax (2006–2020)
- Janet Spragens Pro Bono Award, American Bar Association Section of Taxation (2017)

Professional Activities

- American Bar Association, Section of Taxation, Chair (2022–2023), Chair-Elect (2021–2022) Vice Chair, Pro Bono and Outreach (2013–2016), Member of Council (2007–2010); Chair, Special Projects Committee (2006–2008); Chair, S Corporation Committee (1996–1998)
- American College of Tax Counsel, President (2018–2020), Vice President (2018), Secretary/Treasurer (2017–2018), Regent (2013–2016)
- American College of Trust and Estate Counsel, North Carolina State Chair (1997–2002), Regent (2002–2005)
- American College of LLC and Partnership Attorneys, Founding Fellow (2021)
- American Tax Policy Institute, Trustee (2018–present)
- North Carolina Bar Association; Chair, Young Lawyers Division (1984–1985); Chair, Tax Section (1986–1988); Board of Governors (1989–1992); Chair, Joint Subcommittee of the Taxation and Business Law Sections to draft the 1999 Revised North Carolina Limited Liability Company Act
- One of original drafters of the North Carolina S Corporation Income Tax Act, and the Model S Corporation Income Tax Act endorsed by the American Bar Association and the Multi-State Tax Commission (1987)
- Member of drafting committee for the original enactment and subsequent revision of the North Carolina Limited Liability Company Act (1993, 1999, 2013)
- Columnist, *Journal of Passthrough Entities*, Walters Kluwer

Practice Areas

[Executive Compensation, ERISA, Employee Benefits](#)

[Opportunity Zones](#)

[Real Estate Investment Trusts](#)

[State & Local Tax](#)

[Tax Controversy](#)

Industries

[Private Wealth Services](#)

[Banking & Financial Services](#)

CCH

- Editorial Board, *Journal of Business Entities*, Thomas Reuters (2000–2016)
- Editorial Board, *Journal of Multi-State Taxation and Incentives*, Thomson Reuters (2000–2012)
- Chair, National Association of State Bar Tax Sections (1990–1991)
- Board of Advisors, Planning Committee, J. Nelson Young Tax Institute (1981–present)
- Chair, Southeast Region IRS/Bar Liaison Committee (1989–1990)
- Chair, Young Lawyers Division, Mecklenburg County Bar (1982–1983)

Community

- President, North Carolina 4–H Development Fund, Inc. (2009–2010); Board of Directors (2006–present); Vice President (2007–2008)
- Board of Directors, North Carolina FFA Foundation, Inc. (2015–present)
- Board of Directors, Opera Carolina, Charlotte, North Carolina (2003–2012); Chair (2007–2009), Endowment Board (2009–present)
- Board of Visitors, Duke University School of Law (2007–present)
- Advisory Board, Duke Law School Low Income Taxpayer Clinic (2006–2008)
- Greater Charlotte Heart Ball, American Heart Association, Charlotte Chapter, Member of Executive Committee, Co–Chair, Auction Committee; Co–Chair, Charlotte Heart Society Patron Committee (2005–2012)

Articles & Speeches**Insights**

[QSBS Gets a Makeover: Key Changes Under the OBBBA](#)- Author (August 5, 2025)

[Nelson Mullins Tax Report – IRS Finalizes Look-Through Rule for Domestically Controlled REITs](#)- Contributing Author (May 13, 2024)

[Nelson Mullins Tax Report – IRS Releases Proposed Regulations on 1% Tax on Stock Buybacks under IRA](#)- Co-Author (April 19, 2024)

PLI Corporate Practice Series: Structuring Mergers Acquisitions and Private Equity Recaps When the Target is an S Corporation - Co-Author (2022)

[21% and Rising – What Business Owners Should Consider When Considering Higher Tax Rates](#), *Bloomberg Tax*- Co-Author (July 9, 2021)

PLI Corporate Practice Series: The Road Between Subchapter C And Subchapter S – It May Be A Well-Traveled Two-Way Thoroughfare, But It Isn't Free Of Potholes And Obstacles - Co-Author (2021)

[21% and Rising: What Tax Pros Should Consider with Higher Rates](#), *Accounting Today*- Co-Author (July 2, 2021)

[American Rescue Plan Act of 2021- Co-Author \(March 18, 2021\)](#)

[North Carolina Conforms Definition of Apportionable Income to Multistate Tax Commission UDITPA Model- Co-Author \(March 18, 2021\)](#)

[Nelson Mullins Tax Report: Coronavirus Response and Relief Act- Co-Author \(Jan. 4, 2021\)](#)

PLI Corporate Practice Series: Planning for Real Estate Professionals and Investors Under the Net Investment Income Tax and the Self-Employment Tax - Author (2021)

PLI Corporate Practice Series: Acquisitions and Dispositions of Interests of Closely Held Corporations - Author (2020)

[North Carolina Governor Signs Bill Addressing IRS Conformity and Other Significant Changes to North Carolina Tax Law- Co-Author \(July 6, 2020\)](#)

[Treasury Releases Relief for Opportunity Funds Affected by COVID-19- Co-Author \(June 8, 2020\)](#)

[IRS Says 'No Sale' on Transfer of LLC Interest From Subtrust to Deemed Owner Under Section 678- Co-Author \(June 5, 2020\)](#)

[Treasury Releases Corrections to Final Qualified Opportunity Zone Regulations- Co-Author \(May 12, 2020\)](#)

[IRS Announces Position on Deduction of Business Expenses Associated With PPP Loan Forgiveness- Co-Author \(May 4, 2020\)](#)

[Treasury Releases Guidance for Taxpayers Seeking to Take Advantage of CARES Act Provisions Relaxing Interest Deduction Limitations and Providing Full Expensing of Qualified Improvement Property- Co-Author \(April 28, 2020\)](#)

[IRS Announces Relief for BBA Partnerships to File Amended Tax Returns in 2018 and 2019- Co-Author \(April 17, 2020\)](#)

[Treasury Releases Relief Guidance for REMICS and Investor Trusts Holding Mortgage Loans Entitled to Coronavirus-Related Forbearance Programs- Co-Author \(April 17, 2020\)](#)

[Tax Provisions of the Coronavirus Aid, Relief, and Economic Security Act- Co-Author \(March 30, 2020\)](#)

[Employer Tax Credits Available Under The Families First Act- Co-Author \(March 23, 2020\)](#)

[Tax Report – Qualified Opportunity Zones: Final Regulations Released- Co-Author \(January 9, 2020\)](#)

[Tax Report — Treasury Department Publishes Foreign Tax Credit Guidance, Includes GILTI Relief for R&D Expenses- Co-Author \(December 11, 2019\)](#)

[U.S. Supreme Court Limits North Carolina's Attempt to Tax Undistributed Income of Non-Resident Trust Based on In-State Residence of a Contingent Trust Beneficiary- Co-Author \(June 25, 2019\)](#)

[Tax Report – Qualified Opportunity Zones Guidance: Second Set of Proposed Regulations Released- Co-Author \(May 21, 2019\)](#)

[Updates on Implementation of New Partnership Audit Regime- Co-Author \(February 18, 2019\)](#)

Events/Speaking Engagements

Effective Strategies for the Sale of a Business Owned by an S Corporation - Speaker (November 7, 2025)

Mergers & Acquisitions of Closely-Held S and C Corporations in Private Equity, Up-C, and Domestic and Cross Border SPAC Transactions, 84th Annual NYU Institute on Federal Taxation - Speaker (Oct. 24 and Nov. 21, 2025)

State Income Taxation of Trusts - Due Process of Law After North Carolina Department of Revenue v. Kaestner, 83rd Annual NYU School of Professional Studies Institute on Federal Taxation - Presenter (Oct. 22 and Nov. 25, 2024)

Mergers and Acquisitions of Closely-Held S and C Corporations in Private Equity, Up-C, and Domestic and Cross Border SPAC Transactions, 83rd Annual NYU School of Professional Studies Institute on Federal Taxation - Presenter (Oct. 21 and Nov. 24, 2024)

2024 NCBA Corporate Counsel Section CLE Program , *Forewarned is Forearmed: Tax Considerations in M&A for In-House Counsel*- Presenter (April 17, 2024)

Mergers and Acquisitions of Closely-Held S and C Corporations in Private Equity, Up-C, and Domestic and Cross Border SPAC Transactions, 82nd Annual NYU School of Professional Studies Institute on Federal Taxation - Presenter (Oct. 26 and Nov. 16, 2023)

Mergers and Acquisitions of S and C Corporations in Private Equity and SPAC Transactions, 2023 CBIZ MHM Tax Conference - Presenter (July 13, 2023)

Structuring Mergers, Acquisitions, and Private Equity Recaps When the Target is an S Corporation, 81st Annual NYU School of Professional Studies Institute on Federal Taxation - Presenter (Oct. 27 and Nov. 18, 2022)

Ethical Issues - Tax Opinion Procedures and Policies - A Discussion, 2022 UNC Tax Summit - Co-Presenter (Oct. 28, 2022)

Ethical Issues - Tax Opinion Procedures and Policies - A Discussion, SC Bar Association - Co-Presenter (June 18, 2022)

[FinTech and Tax Implications](#), *FinTech University Series*- Presenter (April 5, 2022)

Structuring Mergers, Acquisitions, and Private Equity Recaps When the Target is an S Corporation (or Other Closely Held Business), 80th Annual NYU School of Professional Studies Institute on Federal Taxation Webcast - Presenter (November 18, 2021)

Entity Planning in Times of Tax Uncertainty, 70th Annual Tulane Tax Institute - Presenter (November 17, 2021)

[Special Purpose Acquisition Companies \(SPACs\) Webinar](#)(April 27, 2021)

Structuring Mergers, Acquisitions, and Private Equity Recaps When the Target is an S Corporation, 79th Annual NYU School of Professional Studies Institute on Federal Taxation Webcast - Presenter (November 19, 2020)

The Alphabet Soup of "ACE," "PHC," and "PSC" - The Accumulated Earnings Tax, the Personal Holding Company Tax, and the Personal Service Corporate Rules After the 2017 Tax Act, 69th Annual Tulane Tax Institute Webcast - Presenter (November 18, 2020)

Merger & Acquisition and Other Corporate Transactions After Tax Reform, 81st Annual Symposium, ncaCPA Webcast - Presenter (November 16, 2020)

20th Annual Oregon Tax Institute Webcast: Don't Forget the Acronyms "AET," "PHC," and "PSC" — The Accumulated Earnings Tax, the Personal Holding Company Tax, and the Personal Service Corporation Rules After the 2017 Tax Act - Speaker (September 15, 2020)

[NYU School of Professional Studies Tax Conference: Structuring Mergers, Acquisitions, and Private Equity Recaps When the Target is an S Corporation](#)- Speaker (July 24, 2020)

The Road Between Subchapter C and Subchapter S – It May Be a Well-Traveled Two-Way Thoroughfare, But It Isn't Free of Potholes and Obstacles , *NYU 78th Institute Federal Taxation*- Presenter (October 24 and November 14, 2019)

The Alphabet Soup of "ACE", "PHCs," and "PSCs": Accumulated Earnings Tax, Personal Holding Companies and Personal Service Corporations , *Southern Federal Tax Institute*- Speaker (October 22, 2019)

Distributions and Liquidations of S Corporations , *New York University Summer Institute*- Speaker (July 26, 2019)

Mergers, Acquisitions and Other Corporate Reorganizations After Tax Reform , *University of Virginia*- Speaker (June 6, 2019)

Acquisitions and Dispositions of Interests in Closely Held Corporations , *NYU 77th Institute on Federal Taxation*-Co-Presenter (October 25 and November 15, 2018)

[Wells Hall to Present at NYU School of Professional Studies Tax Conference](#)- Presenter (July 27, 2018)

[Choice of Entity and Business Tax Planning under the 2017 Tax Act](#)- Speaker (April 26, 2018)

[Council on State Taxation Southeast Regional State Tax Seminar](#), *"Federal Tax Reform – Deciphering the State Tax Implications"*- Speaker (April 10, 2018)

Business Tax Planning During a Time of Tax System Instability , *60th Annual Tulane Tax Institute*- Presenter (November 29, 2017)

Estate Planning For Owners of Closely-Held Businesses , *2017 76th Annual NYU Institute on Federal Taxation*-Presenter (November 16, 2017)

Estate Planning For Owners of Closely-Held Businesses , *2017 76th Annual NYU Institute on Federal Taxation*-Presenter (October 26, 2017)

Mergers and Acquisitions of Closely-Held Businesses , *NYU Summer Institute in Taxation – Wealth Planning for High Net Worth Individuals and Owners of Closely Held Corporations*- Presenter (July 27, 2017)

Tax Issues Arising In Connection With Dividends and Redemptions by Closely Held Corporations , *The Florida Tax Institute*- Presenter (March 30, 2017)

Tax Issues Arising In Connection With Dividends and Redemptions by Closely Held Corporations , *The 51st Annual Southern Federal Tax Institute*- Speaker (September 20, 2016)

Alerts

[IRS Process for Withdrawing Employee Retention Credit Claims](#), Additional Nelson Mullins Alerts (November 16, 2023)

[Nelson Mullins Tax Report – Proposed Regulations on Information Reporting for Digital Asset Sales and Exchanges](#), Additional Nelson Mullins Alerts (September 7, 2023)

[Treasury and IRS Release Guidance on Advanced Energy Project Credits, Direct Payment, and Transferability of Investment Tax Credits](#), Additional Nelson Mullins Alerts (June 21, 2023)

[Nelson Mullins Tax Report – Senate Passes Inflation Reduction Act](#), Additional Nelson Mullins Alerts (August 10, 2022)

[Why Section 1202 and QSBS is So Important to Startup Founders, Employees, and Investors](#), Additional Nelson Mullins Alerts (October 7, 2021)

Blogs

[IRS Proposes Retroactive Withdrawal of Look-Through Rule for Domestically Controlled REITs](#), Tax Reports - Co-Author (October 22, 2025)

[Notice 2025-42 Eliminates 5% Safe Harbor for Most New Solar and Wind Tax Credit Projects](#), Tax Reports - Co-Author (August 19, 2025)

[Significant Tax Provisions of the One Big Beautiful Bill Act](#), Tax Reports - Co-Author (July 17, 2025)

[IRS Issues Final Regulations on Information Reporting by Brokers Regularly Providing Services Affecting Digital Asset Transactions](#), Tax Reports - Author (January 22, 2025)

[IRS Issues Final Regulations on Information Reporting by Brokers Regularly Providing Services Affecting Digital Asset Transactions](#), The Vault - Author (January 22, 2025)

[IRS Issues Final Regulations Under Section 367\(b\) on Anti-Abuse Rule for Triangular Reorganizations and Inbound Nonrecognition \("Killer B"\) Transactions](#), Tax Reports - Co-Author (July 22, 2024)

[IRS Releases Final Regulations on 1% Tax on Stock Buybacks Under IRA](#), Tax Reports - Co-Author (July 9, 2024)

[Moore v. United States -Mandatory Repatriation Tax Found Constitutional](#), Tax Reports - Co-Author (June 28, 2024)

[Nelson Mullins Tax Report – President Biden Signs Inflation Reduction Act Into Law](#) , Tax Reports - Co-Author (August 17, 2022)

[House Ways and Means Committee Proposed Tax Changes Impacting High-Net Worth and High-Income Individuals](#), The Estate Planning & Probate Litigation Blog - Co-Author (September 22, 2021)

[American Rescue Plan Act of 2021](#), Tax Reports - Co-Author (March 18, 2021)

[North Carolina Conforms Definition of Apportionable Income to Multistate Tax Commission UDITPA Model](#), Tax Reports - Co-Author (Jan. 8, 2021)

[Nelson Mullins Tax Report: Coronavirus Response and Relief Act](#), Tax Reports - Co-Author (Jan. 4, 2021)

[North Carolina Governor Signs Bill Addressing IRS Conformity and Other Significant Changes to North Carolina Tax Law](#), Tax Reports - Co-Author (July 6, 2020)

[Treasury Releases Relief for Opportunity Funds Affected by COVID-19](#), Tax Reports - Co-Author (June 8, 2020)

[IRS Says 'No Sale' on Transfer of LLC Interest From Subtrust to Deemed Owner Under Section 678](#), Tax Reports - Co-Author (June 5, 2020)

[Treasury Releases Corrections to Final Qualified Opportunity Zone Regulations](#), Tax Reports - Co-Author (May 12, 2020)

[IRS Announces Position on Deduction of Business Expenses Associated With PPP Loan Forgiveness](#), Tax Reports - Co-Author (May 4, 2020)

[Treasury Releases Guidance for Taxpayers Seeking to Take Advantage of CARES Act Provisions Relaxing Interest Deduction Limitations and Providing Full Expensing of Qualified Improvement Property](#), Tax Reports - Co-Author (April 28, 2020)

[IRS Announces Relief for BBA Partnerships to File Amended Tax Returns in 2018 and 2019](#), Tax Reports - Co-Author (April 17, 2020)

[Treasury Releases Relief Guidance for REMICS and Investor Trusts Holding Mortgage Loans Entitled to Coronavirus-Related Forbearance Programs](#), Tax Reports - Co-Author (April 17, 2020)

[Treasury Extends Deadline for Filing and Payment of 2019 Income Tax Returns](#), Tax Reports - Co-Author (March 30, 2020)

[Employer Tax Credits Available Under The Families First Act](#), Tax Reports - Co-Author (March 23, 2020)

[Tax Report – Qualified Opportunity Zones: Final Regulations Released](#), Tax Reports - Author (January 9, 2020)

[Tax Report — Treasury Department Publishes Foreign Tax Credit Guidance, Includes GILTI Relief for R&D Expenses](#), Tax Reports - Co-Author (December 11, 2019)

[U.S. Supreme Court Limits North Carolina’s Attempt to Tax Undistributed Income of Non-Resident Trust Based on In-State Residence of a Contingent Trust Beneficiary](#), Tax Reports - Author (June 25, 2019)

[Tax Report – Qualified Opportunity Zones Guidance: Second Set of Proposed Regulations Released](#), Tax Reports - Author (May 21, 2019)

[Updates on Implementation of New Partnership Audit Regime](#), Tax Reports - Author (February 18, 2019)