Attorney Liability for Fraudulent Transfers by State

2026 State Chart

State	Act	Under the state's act	Aiding and abetting	Civil conspiracy	When the lawyer holds the money	Authority
Alabama	UVTA, Ala. Code §§ 8-9B-1 to 8-9B-16 (UFTA, §§ 8-9A-1 to -12, for transfers before 2019)	No. The act reaches only the debtor's own transfer; the court refused to extend it to a third party who controlled the debtor's assets (Folmar, 2000)	No appellate decision located	No, for a count that rests on the act (Folmar, 2000). Alabama recognizes damages for a conspiracy to defraud arising from a fraudulent conveyance, but every party held liable received or controlled the property (Johns, 2001)	No appellate decision located	Folmar & Associates LLP v. Holberg, 776 So. 2d 112; Johns v. A.T. Stephens Enterprises, Inc., 815 So. 2d 511 (Ala. 2001); first appeal, 757 So. 2d 416; Ala. Code §§ 8-9B-1 to 8-9B-16; Ala. Code §§ 8-9A-7, 8-9A-8
Alaska	No uniform act; AS 34.40.010 to 34.40.130 (a conveyance made to defraud creditors is void); AS 34.40.110 (self-settled trusts)	No. The statute only voids the conveyance and gives no damages remedy (Summers, 1993)	Barred by statute for a trust carrying an Alaska transfer restriction, against the trustee and anyone who prepared or funded the trust (AS 34.40.110(e), 1998; no court has construed it). Otherwise no appellate decision located	Yes, as the court stated the rule: a judgment creditor who proves actual fraud and an inadequate statutory remedy may recover damages from a participant in the scheme (Summers, 1993; the defendant was a grantee). Barred by statute for a qualifying Alaska trust (AS 34.40.110(e))	No appellate decision located	Summers v. Hagen, 852 P.2d 1165; Merdes & Merdes, P.C. v. Leisnoi, Inc., 410 P.3d 398; AS 34.40.010 to 34.40.130; AS 34.40.110(e) (added as (f) by SB 354 § 21, ch. 105 SLA 1998; amended SB 344 § 10, ch. 82 SLA 2004)
Arizona	UFTA, A.R.S. §§ 44-1001 to 44-1010 (1990)	No. Every remedy in the act runs against the transferee or the transferred asset, and the catch-all supplies no aiding-and-abetting claim (Warne Investments v. Higgins, 2008); the damages claim against a helper lives outside the act, in conspiracy (McElhanon, 1985)	No appellate decision located on a claim for a fraudulent transfer; the act itself supplies none (Warne Investments v. Higgins, 2008)	Yes, against the debtor's lawyer: a jury verdict the Supreme Court approved (McElhanon, 1985, approved 1986). The creditor must hold a judgment, prove actual fraud, and show the act's remedies inadequate; drafting alone is not enough	No appellate decision located	McElhanon v. Hing, 151 Ariz. 386, 728 P.2d 256 (App. 1985), aff'd in part and vacated in part on other grounds, 151 Ariz. 403, 728 P.2d 273; Warne Investments, Ltd. v. Higgins, 219 Ariz. 186, 195 P.3d 645; Moore v. Browning, 203 Ariz. 102, 50 P.3d 852; A.R.S. §§ 44-1007, 44-1008
Arkansas	UVTA, Ark. Code Ann. §§ 4-59-201 to 4-59-213 (UFTA 1987; conformed to the UVTA 2017)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Ark. Code Ann. §§ 4-59-207, 4-59-208

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California	UVTA, Cal. Civ. Code §§ 3439 to 3439.14 (2016); Civ. Code § 1714.10 (court order required before a conspiracy claim against a lawyer is pleaded)	No direct claim. A stranger to the transfer is neither the debtor nor the person for whose benefit it was made (Optronic, 2025), and recovery under the act runs only against the transferee classes (§ 3439.08(b)(2)); a conspiracy or aiding claim may still be pleaded on the act	Yes, at the pleading stage, against the debtor's son who signed the deeds as attorney-in-fact and received nothing (Aghaian, 2020; Berger, 2019). The underlying fraud must be pleaded with particularity	Yes, at the pleading stage (Berger, 2019; Optronic, 2025). Against the debtor's lawyer the claim must first clear § 1714.10, and a claim aimed only at litigation conduct fails under the litigation privilege and the anti-SLAPP statute (Optional Capital, 2017); a claim aimed at the transfer itself does not (Aghaian, 2020)	No appellate decision located	Optronic Technologies, Inc. v. Celestron Acquisition, LLC, 108 Cal. App. 5th 770; Aghaian v. Minassian, 59 Cal. App. 5th 447; Berger v. Varum, 35 Cal. App. 5th 1013; Optional Capital, Inc. v. Akin Gump Strauss Hauer & Feld LLP, 18 Cal. App. 5th 95; Chen v. Berenjian, 33 Cal. App. 5th 811; Cal. Civ. Code §§ 3439.07, 3439.08 (Stats. 2015, ch. 44 (SB 161), eff. Jan. 1, 2016); Cal. Civ. Code § 1714.10
Colorado	UFTA, C.R.S. §§ 38-8-101 to 38-8-112 (1991); §§ 38-8-105, -108 and -109 reworded on UVTA lines by SB 25-133 for claims filed on or after Aug. 6, 2025	Yes, by statute: a judgment for one and one-half the asset's value or the claim, whichever is less, against a person other than the debtor who acts with an actual intent to hinder, delay, or defraud (C.R.S. § 38-8-108(1)(c), added 2014). No decision applies it to an adviser	No appellate decision located	Yes. A transfer that violates the act is a legal wrong that supports a conspiracy claim, no lien required, with damages independent of the act (Double Oak, 2003). The defendants were the debtor's alter egos and the transferee	No appellate decision located	Double Oak Construction, L.L.C. v. Cornerstone Development International, L.L.C., 97 P.3d 140, 146–49 (Colo. App. 2003), overruled on other grounds by L.H.M. Corp., TCD v. Martinez, 2021 CO 78; C.R.S. § 38-8-108(1)(c); C.R.S. §§ 38-8-109, 38-8-111
Connecticut	UFTA, Conn. Gen. Stat. §§ 52-552a to 52-552l (1991)	Federal court's reading only (Nastro, D. Conn. 2003): a damages claim against the debtor's lawyer and firm for preparing the trust documents was dismissed, on Connecticut's policy against lawyer liability to third parties. No Connecticut appellate decision	Federal court's reading only (Nastro, D. Conn. 2003), on the same ground. No Connecticut appellate decision	Yes, where the lawyer lied to the creditor: a jury verdict against the debtor's lawyer, reinstated with its damages (Chapman Lumber, 2008). The wrong was fraud, and Connecticut recognizes no independent conspiracy tort	No appellate decision located	Chapman Lumber, Inc. v. Tager, 288 Conn. 69, 952 A.2d 1; Nastro v. D'Onofrio, 263 F. Supp. 2d 446; Litchfield Asset Management Corp. v. Howell, 70 Conn. App. 133, 799 A.2d 298, cert. denied, 261 Conn. 911; Robinson v. Coughlin, 266 Conn. 1; Scholz v. Epstein, 341 Conn. 1; Conn. Gen. Stat. §§ 52-552h, 52-552i

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Delaware	UFTA, 6 Del. C. §§ 1301 to 1311 (1996); § 1307(c), the adviser safe harbor (1999)	No, by statute: a creditor has no right to relief against a trustee, attorney or other adviser who has not acted in bad faith, and good faith is presumed from counseling or effecting a transfer (§ 1307(c)). No court has applied it, and the Third Circuit questioned its continued validity (Crystallex, 2018)	No, at the trial level: the Court of Chancery refuses the claim (Edgewater, 2010; Ortiz, 2025). The proper defendants are the transferor, the transferees, and the person for whose benefit the transfer was made (§ 1308(b)(1))	No, at the trial level: the act creates no cause of action for conspiring to commit a fraudulent transfer (Edgewater, 2010), and a conspiracy cannot be predicated on a fraudulent transfer (Quadrant, Del. Ch. 2014; Fringer, 2018). No Delaware Supreme Court decision	No appellate decision located	Quadrant Structured Products Co. v. Vertin, 102 A.3d 155, 203; Fringer v. Kersey Homes, Inc.; Edgewater Growth Capital Partners, L.P. v. H.I.G. Capital, Inc., 2010 WL 720150; Ortiz v. Ortiz, C.A. No. 2024-0692-CDW (Del. Ch. Mar. 31, 2025); Trenwick America Litigation Trust v. Ernst & Young, L.L.P., 906 A.2d 168 (Del. Ch. 2006), aff'd sub nom. Trenwick Am. Litig. Tr. v. Billett, 931 A.2d 438 (Del. 2007); Crystallex International Corp. v. Petróleos de Venezuela, S.A., 879 F.3d 79; 6 Del. C. § 1307 (70 Del. Laws, c. 434; § 1307(c) added 72 Del. Laws, c. 226); 6 Del. C. § 1308
Florida	UFTA (FUFTA), Fla. Stat. §§ 726.101 to 726.112 (1987)	No. Chapter 726 creates no cause of action against a person who assisted a transfer but never received the property (Freeman, 2004)	No. The certified question was answered in the negative, the answer confined to chapter 726 (Freeman, 2004); the Fifth District had reached the same result under § 222.30 and chapter 726 (BankFirst, 2003)	Open. The Supreme Court reserved the common-law question (Freeman, 2004, n.4) and no later Florida appellate decision has answered it; in 2003 two district courts sent conspiracy counts against advisers out for want of a statutory cause of action (BankFirst; Danzas Taiwan)	Control decides it, not handling: a bank that kept the debtor's account and sent the money out by wire was a non-transferee (Freeman, 2004). Under § 550, a lawyer whose trust account receives the money is the initial transferee unless he proves both lack of control and good faith (Harwell, 11th Cir. 2010)	Freeman v. First Union National Bank, 865 So. 2d 1272; BankFirst v. UBS Paine Webber, Inc., 842 So. 2d 155; Danzas Taiwan, Ltd. v. Freeman, 868 So. 2d 537; Hansard Construction Corp. v. Rite Aid of Florida, Inc., 783 So. 2d 307; McCalla v. E.C. Kenyon Construction Co., 183 So. 3d 1192; SE Property Holdings, LLC v. Welch, 65 F.4th 1335; Martinez v. Hutton (In re Harwell), 628 F.3d 1312; Fla. Stat. § 726.108; Fla. Stat. § 726.109; Fla. Stat. § 222.30
Georgia	UVTA, O.C.G.A. §§ 18-2-70 to 18-2-85 (July 1, 2015)	No appellate decision located	No appellate decision located	Undecided for a non-transferee adviser. The one decision against a lawyer was brought by a woman he had represented, over her own property, and it affirmed a denial of summary judgment (Both v. Frantz, 2006)	No appellate decision located	Both v. Frantz, 278 Ga. App. 556, 629 S.E.2d 427; O.C.G.A. §§ 18-2-70, 18-2-77, 18-2-78
Hawaii	UFTA, HRS §§ 651C-1 to 651C-10 (1985)	No appellate decision located	No appellate decision located	Undecided for a non-transferee. Conspiracy to make a fraudulent transfer is a jury claim that carries punitive damages, decided against transferees on clear and convincing proof (Kekona v. Bornemann, 2015)	No appellate decision located	Kekona v. Bornemann, 135 Haw. 254, 349 P.3d 361 (2015), vacating in part 130 Haw. 58, 305 P.3d 474; Kekona v. Abastillas, 113 Haw. 174, 150 P.3d 823; HRS §§ 651C-7, 651C-8
Idaho	UVTA, Idaho Code §§ 55-910 et seq. (2015)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Idaho Code §§ 55-916, 55-917

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Illinois	UFTA, 740 ILCS 160/1 et seq. (1989)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	740 ILCS 160/8, 160/9
Indiana	Ind. Code ch. 32-18-2 (fraudulent transfers)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Ind. Code §§ 32-18-2-17, 32-18-2-18
Iowa	UVTA, Iowa Code ch. 684 (2016)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Iowa Code §§ 684.7, 684.8
Kansas	UFTA, K.S.A. 33-201 to 33-212 (1999)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	K.S.A. 33-207, 33-208
Kentucky	UVTA, KRS ch. 378A (Jan. 1, 2016)	Undecided under the current act. Before 2016, federal courts reading the repealed statutes held the creditor had no claim against a non-transferee (GATX, E.D. Ky. 2012; CNH Capital, 6th Cir. 2014, unpublished); the 2016 act added the beneficiary clause those decisions relied on	Undecided under the current act. A federal court reading the repealed statutes found no aiding-and-abetting claim (Corporex, E.D. Ky. 2015)	Undecided under the current act. A federal court reading the repealed statutes called it "legally impossible" for a non-transferee to conspire in a fraudulent conveyance (GATX, E.D. Ky. 2012)	No appellate decision located	GATX Corp. v. Addington, 879 F. Supp. 2d 633; CNH Capital America LLC v. Hunt Tractor, Inc., 568 F. App'x 461 (6th Cir. 2014); Bank of America, N.A. v. Corporex Cos., 99 F. Supp. 3d 708; KRS 378A.070, 378A.080
Louisiana	No uniform act; the revocatory action, La. Civ. Code arts. 2036 to 2043	No appellate decision located. The revocatory action annuls the debtor's act and carries no damages remedy	No appellate decision located	No appellate decision located	No appellate decision located	La. Civ. Code arts. 2036 to 2043
Maine	UFTA, 14 M.R.S. §§ 3571 to 3582 (1985), with a non-uniform double-damages remedy at § 3578(1)(C)(3)	No, on a federal court's reading (Prawer, D. Me. 1993). The statute that made a knowing helper liable in double damages, applied to a debtor's own lawyer in 1986 (Northeast Bank v. Murphy), was repealed effective July 16, 1986 and never replaced	No, on a federal court's reading: a fraudulent transfer is not a tort (Prawer, D. Me. 1993). The defendants were accountants	No, on the same federal reading (Prawer, D. Me. 1993)	No appellate decision located	FDIC v. S. Prawer & Co., 829 F. Supp. 453; Northeast Bank of Lewiston & Auburn v. Murphy, 512 A.2d 344; Meridian Medical Systems, LLC v. Epix Marketing Group, LLC, 2021 ME 24; 14 M.R.S. §§ 3578, 3579; 14 M.R.S. § 3155
Maryland	UFCA, Md. Code, Com. Law §§ 15-201 to 15-214 (neither the UFTA nor the UVTA)	No appellate decision located. The act provides no money judgment against anyone	No appellate decision located	No appellate decision located. A bankruptcy court dismissed a conspiracy claim against an escrow company and the lawyer who advised the debtor, because a conspirator must be a party to the transfer as transferor or transferee (In re Minh Vu Hoang, Bankr. D. Md. 2012)	No appellate decision located	In re Minh Vu Hoang (Rosen v. Gemini Title & Escrow, LLC), No. 05-21078-TJC, Adv. No. 09-00853, 2012 WL 195316; Md. Code, Com. Law §§ 15-209, 15-210
Massachusetts	UFTA, Mass. Gen. Laws ch. 109A (1996)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Mass. Gen. Laws ch. 109A, §§ 8, 9
Michigan	UVTA, MCL 566.31 to 566.45 (2017)	No appellate decision located. Recovery under the act is available only against the listed transferees (MCL 566.38(2)(b))	No appellate decision located	No appellate decision located	No appellate decision located	MCL 566.37, 566.38

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Minnesota	UVTA, Minn. Stat. §§ 513.41 to 513.51 (2015)	No appellate decision located. Recovery under the act is available only against the listed transferees (§ 513.48(b)(2))	Split, with no precedential decision. A nonprecedential 2014 appeal reinstated the claim against a law firm at the pleading stage, and the creditor then lost at trial (Janssen); a federal court predicts the claim is not cognizable (ASI v. Aquawood, D. Minn. 2022)	Trial-level decisions only. The same nonprecedential appeal reinstated a conspiracy count against the firm (Janssen, 2014); a federal court let a conspiracy count against transferees proceed (Producers Livestock, D. Minn. 2024). No decision reaches a non-transferee	No decision located under the state act	Janssen v. Lommen, Abdo, Cole, King & Stageberg, P.A., No. A14-0452 (Minn. Ct. App. Dec. 22, 2014) (nonprecedential), rev. denied (Minn. Mar. 17, 2015); later appeal No. A23-0856 (Minn. Ct. App. Mar. 18, 2024); ASI, Inc. v. Aquawood, LLC, No. 19-763, 2022 WL 980398; Producers Livestock Credit Corp. v. Revier Brand Group, LLC, No. 24-56 (DWF/JFD); Minn. Stat. §§ 513.47, 513.48
Mississippi	UFTA, Miss. Code Ann. §§ 15-3-101 to 15-3-121 (2006)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Miss. Code Ann. §§ 15-3-111, 15-3-113
Missouri	UFTA, Mo. Rev. Stat. §§ 428.005 to 428.059 (1992)	No. The act's remedies are equitable and include no damages suit against a third party who did not receive the property (Lewellen, Mo. App. 2019; the defendant was the debtor's insurer)	No appellate decision located	No, absent a valid lien (Lewellen, Mo. App. 2019); the court refused an absolute bar	No appellate decision located	Lewellen v. Universal Underwriters Insurance Co., 574 S.W.3d 251; Mo. Rev. Stat. §§ 428.039, 428.044
Montana	UFTA, Mont. Code Ann. §§ 31-2-326 to 31-2-342 (1991)	No appellate decision located. A federal court applying Montana law followed the majority rule that liability for a fraudulent transfer does not reach a third party who received none of the property (Magten, D. Del. 2007)	No appellate decision located. A federal court applying Montana law rejected aiding-and-abetting and conspiracy claims against the law firm that represented both parties to the transfer, because the firm received none of the property (Magten, D. Del. 2007)	No appellate decision located. A federal court applying Montana law refused conspiracy liability against a non-transferee (Magten, D. Del. 2007)	No appellate decision located	Magten Asset Management Corp. v. Paul Hastings Janofsky & Walker LLP, No. Civ.A.04-1256-JJF, 2007 WL 129003; Mont. Code Ann. §§ 31-2-339, 31-2-340
Nebraska	UVTA, Neb. Rev. Stat. §§ 36-801 to 36-815 (2019)	No appellate decision located. Recovery under the act is available only against the listed transferees (§ 36-809(b)(2))	No appellate decision located	No appellate decision located	No appellate decision located	Neb. Rev. Stat. §§ 36-808, 36-809
Nevada	UFTA, NRS 112.140 to 112.250 (1987)	No. The act gives the creditor "an equitable right to the property" and no damages claim against a non-transferee (Cadle v. Woods & Erickson, 2015, en banc; the defendant was an asset-protection law firm)	No (Cadle, 2015)	No, because the act supplies only equitable remedies; the not-a-tort rationale does not apply in Nevada (Cadle, 2015)	No appellate decision located	The Cadle Co. v. Woods & Erickson, LLP, 131 Nev. 114, 345 P.3d 1049 (2015); NRS 112.210, 112.220
New Hampshire	UFTA, RSA ch. 545-A (1988)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	RSA 545-A:7, 545-A:8
New Jersey	UVTA, N.J.S.A. 25:2-20 to 25:2-34 (2021; UFTA from 1989)	No claim on the act's own text: its money judgment runs only to the first transferee or the person for whose benefit the transfer was made (N.J.S.A. 25:2-30(b)(1)), and no decision has tested the catch-all. The Supreme Court located the lawyer's exposure in common-law conspiracy riding on a violation of the act (Gandi, 2005)	No appellate decision located; New Jersey's answer runs through conspiracy	Yes, at the pleading stage, against the debtor's attorney: a creditor may sue one who assists a fraudulent transfer for conspiracy to violate the act (Gandi, 2005). The creditor must prove the agreement and knowledge elements and every element of the underlying transfer claim	No appellate decision located	Banco Popular North America v. Gandi, 184 N.J. 161, 876 A.2d 253; LoBiondo v. Schwartz, 199 N.J. 62; N.J.S.A. 25:2-29, 25:2-30, 25:2-32

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New Mexico	UVTA, NMSA 1978 §§ 56-10-14 to 56-10-25 (2015)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	NMSA 1978 §§ 56-10-21, 56-10-22 (H.B. 85, 52nd Leg., 1st Sess. (2015))
New York	UVTA, N.Y. Debt. & Cred. Law §§ 270 to 281 (Apr. 4, 2020)	No, decided under the former act: no money-damages remedy against parties who were neither transferees nor beneficiaries (Porco, 1990). The 2020 act keeps that limit (§ 277(b)(1)(i)) and adds a catch-all (§ 276(a)(3)(iii)) that no appellate decision has construed on the point	No, unless the defendant was a transferee or benefited (Berisha, 1st Dep't 2023, applying Porco)	No (Porco, 1990); the defendants had no dominion or control over the assets and took no benefit	A law firm's own fee is reachable: whether a $75,000 fee paid by an insolvent debtor was a fraudulent conveyance under former DCL §§ 273 and 275 was a triable issue (Joel v. Weber, 1993)	FDIC v. Porco, 75 N.Y.2d 840, 552 N.E.2d 158; Matter of Berisha v. 4042 E. Tremont Cafe Corp., 220 A.D.3d 608, 199 N.Y.S.3d 38; Joel v. Weber, 197 A.D.2d 396, 602 N.Y.S.2d 383; N.Y. Debt. & Cred. Law §§ 276, 277
North Carolina	UVTA, N.C. Gen. Stat. §§ 39-23.1 to 39-23.12 (2015)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	Fox v. Wilson, 85 N.C. App. 292, 354 S.E.2d 737 (1987); N.C. Gen. Stat. §§ 39-23.7, 39-23.8
North Dakota	UVTA, N.D.C.C. ch. 13-02.1	No, by implication: a law firm could be liable only as a first transferee under the act (PHI Financial, 2016); the catch-all is untested and no common-law theory was reached	No appellate decision located	No appellate decision located	Split on the facts: money the firm passed through its trust account on the debtor's instruction did not make it the first transferee, but the $115,000 it kept as fees did (PHI Financial, 2016), applying the bankruptcy conduit test to the state act	PHI Financial Services, Inc. v. Johnston Law Office, P.C., 2016 ND 20, 874 N.W.2d 910; N.D.C.C. §§ 13-02.1-07, 13-02.1-08
Ohio	UFTA, Ohio Rev. Code §§ 1336.01 to 1336.11 (1990)	No. Chapter 1336 applies only to the transferor and the transferee of the funds (Magnum Steel, 9th Dist. 2015; a law firm and two attorneys who only advised). The judgment section also reaches the person for whose benefit the transfer was made (§ 1336.08(B)(1))	No common-law claim: the Supreme Court declined to recognize aiding-and-abetting liability under the circumstances of the case (DeVries Dairy, 2012). A statutory damages action survives where the assisted conduct is a crime (R.C. 2307.60; Jacobson, 2016)	Open. An appellate court with the question before it assumed the answer and disposed of the claim on the evidence (Magnum Steel, 2015)	No appellate decision located	Magnum Steel & Trading, L.L.C. v. Roderick Linton Belfance, L.L.P., 2015-Ohio-3450; DeVries Dairy, L.L.C. v. White Eagle Cooperative Assn., Inc., 132 Ohio St. 3d 516, 2012-Ohio-3828; Jacobson v. Kaforey, 149 Ohio St. 3d 398, 2016-Ohio-8434; Collins v. National City Bank, 2003-Ohio-6893; Ohio Rev. Code § 1336.07; Ohio Rev. Code § 1336.08; Ohio Rev. Code § 2307.60
Oklahoma	UFTA, 24 O.S. §§ 112 to 123 (1986)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	24 O.S. §§ 119, 120
Oregon	UVTA, ORS 95.200 to 95.310 (2023)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	ORS 95.260, 95.270, 95.310
Pennsylvania	UVTA, 12 Pa.C.S. §§ 5101 to 5114 (2018; PUFTA from 1993)	No appellate decision located. The money judgment runs to the first transferee or the person for whose benefit the transfer was made (§ 5108(b)(1)(i))	No appellate decision located	No appellate decision located	No decision holds a lawyer a transferee. The one law-firm case ended for the firm because the debtors received reasonably equivalent value for the fees (Trizechahn, Pa. Super. 2023)	Trizechahn Gateway LLC v. Schnader Harrison Segal & Lewis LLP, 2023 PA Super 249, 305 A.3d 1107; 12 Pa.C.S. §§ 5107, 5108

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Rhode Island	UVTA, R.I. Gen. Laws §§ 6-16-1 to 6-16-12 (2018)	No appellate decision located	No appellate decision located	No appellate decision located	Yes, as first transferee: the debtor's own attorney took a quitclaim deed for inadequate consideration and answered for a $30,000 judgment measured by the creditors' claim (Nisenzon, 1997)	Nisenzon v. Sadowski, 689 A.2d 1037; Toste Farm Corp. v. Hadbury, Inc., 798 A.2d 901; R.I. Gen. Laws §§ 6-16-7, 6-16-8
South Carolina	No uniform act; the Statute of Elizabeth, S.C. Code Ann. § 27-23-10	No appellate decision located. The statute voids the conveyance and has no remedies section, though courts award the creditor its debt against the taker (Future Group, 1996)	Undecided for a non-transferee adviser. The nearest decisions involve a transferee bank (Future Group, 1996) and a lawyer whose claim failed for want of actual knowledge (Gordon v. Busbee, 2012)	Undecided for a non-transferee. A creditor's conspiracy claim was decided on the evidence against a transferee (Future Group, 1996); the elements were restated in 2021 (Paradis)	No appellate decision located	Future Group, II v. Nationsbank, 324 S.C. 89, 478 S.E.2d 45; Paradis v. Charleston County School District, 433 S.C. 562; Gordon v. Busbee, 397 S.C. 119; S.C. Code Ann. § 27-23-10
South Dakota	UFTA, SDCL ch. 54-8A (1987)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	SDCL §§ 54-8A-7, 54-8A-8
Tennessee	UFTA, Tenn. Code Ann. §§ 66-3-301 to 66-3-313	No appellate decision located	No appellate decision located	Undecided for a non-transferee. The one conspiracy verdict ran against transferees and was never reviewed (Sanford, 2010); a 2015 decision rejected the claim against a non-transferee trustee for want of a wrongful act of her own (Taylor v. George)	No appellate decision located	Sanford v. Waugh & Co., 328 S.W.3d 836; Taylor v. George; Tenn. Code Ann. §§ 66-3-308, 66-3-309
Texas	UFTA, Tex. Bus. & Com. Code §§ 24.001 to 24.013	No appellate decision holds the act reaches a helper. The money judgment runs to the first transferee or the person for whose benefit the transfer was made (§ 24.009(b))	No appellate decision located	Yes, for a judgment creditor with a lien (Stonecipher, 1979). A lawyer can be exposed for knowingly drafting documents to put assets beyond a judgment creditor (Essex Crane, 2012), within the attorney-immunity test (Cantey Hanger, 2015)	No appellate decision located	Estate of Stonecipher v. Estate of Butts, 591 S.W.2d 806 (Tex. 1979); second appeal, 686 S.W.2d 101; Essex Crane Rental Corp. v. Carter, 371 S.W.3d 366; Cantey Hanger, LLP v. Byrd, 467 S.W.3d 477; Tex. Bus. & Com. Code §§ 24.008, 24.009
Utah	UVTA, Utah Code § 25-6-101 et seq.	No appellate decision located	No appellate decision located	No appellate decision located	Trial-level only. A district court held a law firm cannot exercise dominion or control over trust-account funds and is no transferee; the appellate affirmance was vacated as moot (Timothy v. Pia, 2019 UT 69)	Timothy v. Pia, Anderson, Dorius, Reynard & Moss, 2018 UT App 31, 424 P.3d 937, vacated as moot, 2019 UT 69, 456 P.3d 731; Utah Code §§ 25-6-303, 25-6-304
Vermont	UVTA, 9 V.S.A. §§ 2285 to 2299 (2017; UFTA from 1996)	No appellate decision located	No appellate decision located	No, for a creditor without a lien, decided in 1853 against a transferee and never revisited (Hall v. Eaton, 25 Vt. 458)	No appellate decision located	Hall v. Eaton, 25 Vt. 458; Adler v. Fenton, 65 U.S. (24 How.) 407; 9 V.S.A. §§ 2291, 2292, 2299 (1995, No. 179 (Adj. Sess.), § 14; 2017, No. 20, § 1)
Virginia	No uniform act; Va. Code §§ 55.1-400, 55.1-401	No. The statute only voids the conveyance and imposes no liability on the participants (La Bella Dona, 2017)	No appellate decision located; the same reasoning forecloses it	No. A fraudulent conveyance is not a wrong from which liability can pass to others, in common-law or statutory business conspiracy (La Bella Dona, 2017; the defendants included the debtors' own law firm)	No appellate decision located	La Bella Dona Skin Care, Inc. v. Belle Femme Enterprises, LLC, 294 Va. 243, 805 S.E.2d 399; Kubli v. Westwood Buildings, L.P., Record Nos. 191413, 191414; Va. Code §§ 55.1-400, 55.1-401

State	Act	Under the state's act	Aiding and abetting	Civil conspiracy	When the lawyer holds the money	Authority
Washington	UVTA, ch. 19.40 RCW (2017)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	RCW 19.40.071, 19.40.081
West Virginia	UFTA, W. Va. Code §§ 40-1A-1 to 40-1A-15 (1986)	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	W. Va. Code §§ 40-1A-7, 40-1A-8
Wisconsin	Uniform Voidable Transactions Law, Wis. Stat. ch. 242 (2023; UFTA from 1987)	No. The money judgment runs only against transferee-side persons (§ 242.08(2)(am), (bm)), and the catch-all opens the chapter to no punitive damages (C & A Investments, 2010)	No appellate decision located	Yes, at the pleading stage. A complaint alleging a conspiracy to make fraudulent conveyances stated a claim against a co-conspirator bank without deciding whether the bank received any conveyance, with damages independent of the act (Dalton v. Meister, 1976); particularity is now required	No appellate decision located	C & A Investments v. Kelly, 2010 WI App 151, 330 Wis. 2d 223, 792 N.W.2d 644; Dalton v. Meister, 71 Wis. 2d 504, 239 N.W.2d 9; Miller Compressing Co. v. Busby; Wis. Stat. §§ 242.07, 242.08
Wyoming	UFTA, W.S. §§ 34-14-201 to 34-14-212	No appellate decision located	No appellate decision located	No appellate decision located	No appellate decision located	W.S. §§ 34-14-208, 34-14-209

The chart answers three questions for each state. The first is whether the state's fraudulent transfer act itself gives a claim against a lawyer who received nothing. The second is whether the state allows a claim against that lawyer for aiding and abetting or civil conspiracy. The third is when a lawyer who holds the money becomes a transferee. Each cell names the decision or statute behind it.

"Under the state's act" means a claim for damages or other relief that the state's fraudulent transfer statute itself gives against a person who assisted the transfer and never received the property. Some cells rest on a federal court's reading of the state's law; they appear where no appellate decision of that state answers the question. The PDF adds each state's act, the twelve federal circuits' tests, and the sources for every row.

In most states, a creditor cannot sue the lawyer who helped a debtor make a fraudulent transfer unless the lawyer ended up with some of the property.

The fraudulent transfer act, which nearly every state has adopted in one form or another, lets a creditor undo the transfer and recover from the person who received the property. It gives no damages claim against someone who received nothing.

A lawyer who advised the transfer and drafted the documents but took nothing is not a defendant the statute names. Florida's Supreme Court said so in Freeman v. First Union, and every other state court to consider the question has agreed. Only Colorado's statute reaches someone who received nothing, in a clause no court has applied to a lawyer.

The creditor's other route is a claim for civil conspiracy or aiding and abetting, on proof that the lawyer knowingly joined a transfer made to defraud. Eight states allow that claim, each on its own conditions. Eight have refused it. The rest have not decided, Florida among them. The chart below gives each state's answer and the decision behind it.

Where the claim is allowed, the lawyers who lost, or were sent to trial, had all done something beyond advising and drafting.

- One took the debtor's stock as security for his own fees.
- One took a deed to the property.
- Two filed agreed judgments that carried out the transfer.
- One told the creditor's lawyer there was equity in property the debtor no longer owned.
- One paid a $500,000 settlement out of his trust account the day it arrived, with a judgment outstanding.

No court anywhere has held a lawyer liable to a creditor for advice or drafting alone.

Money in the lawyer's trust account is the hardest case. Under the state acts and in most federal circuits, a lawyer who passes the money through on the debtor's instructions is a conduit, not a transferee. In the Eleventh Circuit, which covers Florida, the lawyer is the transferee unless the lawyer proves both a lack of control over the money and good faith.

Everywhere, a fee kept out of the money is a transfer to the lawyer, tested on value and good faith.

Whether the transfer is also a crime, and whether the lawyer can be prosecuted for it, is a separate question, answered state by state on the criminal liability page.

Cases Against Lawyers

The table lists the court decisions, state and federal, in which a lawyer was pursued over a debtor's transfer or bankruptcy: what the lawyer did, the theory, and how each case ended.

Case	State and year	What the lawyer did	Theory	Outcome
Cadle v. Woods & Erickson	Nevada, 2015	Created an asset protection trust and entities the debtor then funded	Conspiracy, aiding and abetting, concert of action	No claim against a non-transferee; judgment for the firm affirmed en banc
Magnum Steel v. Roderick Linton Belfance	Ohio, 2015	Advised that any sale be at fair market value; was paid fees for the defense	The act, conspiracy, aiding and abetting	The act reaches only transferor and transferee; fees bona fide; conspiracy failed on the evidence
Nastro v. D'Onofrio	Connecticut (federal court), 2003	Prepared the documents creating an offshore trust	Damages under the act; aiding a fraudulent transfer	Count dismissed on the pleadings
Optional Capital v. Akin Gump	California, 2017	Represented the transferee in the litigation and a mediation	Conspiracy, aiding and abetting	Claims struck under the anti-SLAPP statute; litigation privilege
Janssen v. Lommen Abdo	Minnesota, 2014 and 2024 (nonprecedential)	Drafted the entity and transfer papers mid-trial; took $500,000 in mortgages for fees	The act, conspiracy, aiding and abetting	Reinstated at the pleading stage; creditor lost at trial
Both v. Frantz	Georgia, 2006	Drafted powers of attorney and formed the partnership that took the property of the woman he represented	Fraudulent conveyance and conspiracy, brought by that woman	Denial of summary judgment affirmed
La Bella Dona v. Belle Femme	Virginia, 2017	Took a note secured by the debtor's assets, foreclosed, bought at its own auction, and sold to the family's new company	Common-law and statutory conspiracy; avoidance	Conspiracy counts dismissed; the conveyance count against the firm as recipient sent back for trial
McElhanon v. Hing	Arizona, 1985, approved 1986	Prepared the stock sale the day after the judgment and kept the certificates as security for his fees	Conspiracy to commit a fraudulent conveyance	$286,120 verdict upheld
Nisenzon v. Sadowski	Rhode Island, 1997	Took the property by quitclaim deed for a consideration the court disbelieved	Fraudulent transfer; fraud	$30,000 judgment affirmed against him as first transferee
Essex Crane v. Carter	Texas, 2012	After the creditor's judgments, drafted the assignment and agreed judgments for the son's new company and filed them	Conspiracy; attorney immunity claimed	Summary judgment for the lawyers reversed; fact issues
Banco Popular v. Gandi	New Jersey, 2005	Assisted the transfer and issued an opinion letter to the lender	Conspiracy to violate the act; fraud; negligence	Conspiracy count reinstated at the pleading stage; opinion-letter claims went forward
Chapman Lumber v. Tager	Connecticut, 2008	Advised the debtor to take his name off the deeds, then negotiated a note and mortgage on property the debtor no longer owned	Fraud	$55,500 verdict reinstated with exemplary damages
Joel v. Weber	New York, 1993	Took a $75,000 fee from an insolvent payor	Fraudulent conveyance of the fee; aiding and abetting	Triable issue on the fee
PHI Financial v. Johnston Law Office	North Dakota, 2016	Passed $20,400 through its trust account on instruction and kept $150,000 as fees	The act; first transferee	Conduit as to the pass-through; $115,000 of the fees voided
Timothy v. Pia, Anderson	Utah, 2019 (trial-level ruling; appeal vacated)	Held $50,000 of the debtors' money in its trust account	The act; transferee	Trial court held it no transferee; the appellate affirmance was vacated as moot
Trizechahn Gateway v. Schnader Harrison	Pennsylvania, 2023	Was paid fees by the debtors to handle their appeal	The act; the fee transfers	Judgment for the firm; reasonably equivalent value
In re Harwell	Eleventh Circuit, 2010	Took $500,000 of the debtor's settlement into his trust account and paid it out the same day	Section 550, initial transferee	Summary judgment for the lawyer reversed; lost on good faith on remand

Case	State and year	What the lawyer did	Theory	Outcome
In re Cargo Transportation Services	Bankruptcy court, Florida, 2013	Took six $5,000 payments into trust, paid its approved fee, and remitted the balance	Section 550, preference	Mere conduit acting in good faith
In re Coutee	Fifth Circuit, 1993	Deposited the debtors' judgment proceeds in its trust account and paid their bank loan	Section 550, preference	Initial transferee was the bank; the firm was not
Southmark v. Schulte Roth & Zabel	Fifth Circuit, 2000 (unpublished)	Took a fee traced to an avoided $3,000,000 transfer	Section 550(b)(1), subsequent transferee	Fee recovered; the firm knew facts making the transfer recoverable
In re Bressman	Third Circuit, 2003	Three firms took $392,218.57 in fees paid by the debtor's wife	Sections 549 and 550(b)(1)	Firms kept the fees; good faith and no knowledge
Rajala v. Spencer Fane	Tenth Circuit, 2020	Firms were paid from the proceeds of an avoided transfer	Section 550, transferee	Not transferees of the property transferred; complaints dismissed
Klein v. King & King & Jones	Tenth Circuit, 2014 (unpublished)	Took a $25,000 defense fee wired from the debtor's account	Utah act, read with section 550	Initial transferee; lost on reasonably equivalent value
In re Bella Vista by Paramont (Farrar)	Ninth Circuit, 2013 (unpublished)	Debtor's own counsel, paid from debtor funds	Section 550, initial transferee	Held the initial transferee; no credible argument otherwise
DuVoisin v. Kennerly	Federal district court, Tennessee, 1990	Held the debtor's money in its escrow account under written instructions	Sections 547, 548, and 550	Transferee; good faith failed; liability limited to $359,101.60
Boyer v. Carlton, Fields	Seventh Circuit, 1996	Received $125,000 of the debtor's money and deducted a $14,000 fee	Section 542 turnover	Transferee of the fee only; ordered to turn over the whole $125,000 as possessor
In re Belmonte	Second Circuit, 2019	Received $59,432 of the debtor's money	Section 550	Ordered to remit; no conduit argument made
United States v. Webster	Seventh Circuit, 1997	Incorporated the debtors' bar, backdated the stock certificates, and drafted false schedules	18 U.S.C. § 152(1), aiding and abetting	Conviction affirmed
United States v. Ledée	First Circuit, 2014	Drafted the deed nine months before the petition and signed it as president of the corporation	§ 152(7) and § 371	Conviction and 36-month sentence affirmed
United States v. Kowalski	Seventh Circuit, 2024	Concealed about $357,000 of her brother's money in her own trust account	§ 152(1)	Guilty plea; 37-month sentence affirmed
United States v. Gellene	Seventh Circuit, 1999	Filed sworn declarations omitting his firm's ties to the senior creditor	§ 152(3)	Conviction affirmed; 15 months
United States v. Knight	Eighth Circuit, 2015	Advised forming an entity and ran about $1.2 million through his trust account	§§ 152(7), 152(3), 371; aiding and abetting	New trial on every count affirmed; indictment then dismissed

The federal transferee question, circuit by circuit

Who is the initial transferee under 11 U.S.C. section 550(a)(1) when a lawyer or escrow agent holds the money, in each regional circuit.

Circuit	Test for the initial transferee	Good faith an element of escaping that status	Controlling decisions	Lawyer application
First	No circuit-level test located	Not decided	Max Sugarman Funeral Home v. A.D.B. Investors, 926 F.2d 1248 (1st Cir. 1991) (applies § 550(a)(1) and (b)(1); states no test)	None located
Second	Mere conduit: a commercial entity that channels funds under its contract, in the ordinary course of its business, is not the initial transferee	No; good faith is the § 550(b)(1) defense for subsequent transferees	Christy v. Alexander & Alexander (In re Finley, Kumble), 130 F.3d 52, 57–58 (2d Cir. 1997)	None at circuit level on a trust account. A law firm was ordered to remit $59,432 under § 550 with no conduit argument made (In re Belmonte, 931 F.3d 147 (2d Cir. 2019))
Third	No circuit-level test located; bankruptcy courts in the circuit apply dominion and control	Not decided	In re Resorts Int'l, 181 F.3d 505 (3d Cir. 1999) states no § 550 test	Wasserman v. Bressman (In re Bressman), 327 F.3d 229 (3d Cir. 2003): three law firms kept $392,218.57 of fees under § 550(b)(1); a trustee's warning letter created no knowledge and no duty to investigate; a § 549 post-petition case; transferee status never litigated
Fourth	Legal dominion and control, exercised	No, as an element of transferee status. A recipient who asks to be excused as a mere conduit must have acted in good faith (In re Harbour, 845 F.2d 1254, 1258 (4th Cir. 1988))	Bowers v. Atlanta Motor Speedway (In re Southeast Hotel Props.), 99 F.3d 151, 156 (4th Cir. 1996); Grayson Consulting v. Wachovia (In re Derivium Capital), 716 F.3d 355, 362 (4th Cir. 2013)	None located
Fifth	Legal dominion or control (later cases say dominion and control)	No; good faith is the § 550(b)(1) defense for subsequent transferees	Sec. First Nat'l Bank v. Brunson (In re Coutee), 984 F.2d 138, 140–41 (5th Cir. 1993); Whitlock v. Lowe, 945 F.3d 943 (5th Cir. 2019)	Coutee: a law firm's trust account that received the debtors' settlement was not the initial transferee; the firm had no legal right to use the money as its own. Southmark v. Schulte Roth & Zabel (5th Cir. 2001, unpublished): a firm's fee traced to an avoided $3,000,000 transfer was clawed back because the firm "knew facts that would lead a reasonable person to believe" the transfer was recoverable ($882,587.30 after rehearing)
Sixth	Dominion (legal authority over the funds, not possession); recent cases style it dominion and control	No; good faith is the § 550(b)(1) defense for later transferees and the § 548(c) defense for an initial transferee of a fraudulent transfer	First Nat'l Bank of Barnesville v. Rafoth (In re Baker & Getty), 974 F.2d 712, 722 (6th Cir. 1992); Meoli v. Huntington Nat'l Bank, 848 F.3d 716, 725–26 (6th Cir. 2017)	None at circuit level. DuVoisin v. Kennerly (E.D. Tenn. 1990–91, unreviewed): a law firm's escrow account made it a mediate transferee of a fraudulent transfer and the initial transferee of a preference; its good-faith defense failed because a partner knew or should have known; judgment reduced to $359,101.60; decided before the circuit adopted the dominion test
Seventh	Dominion: the right to put the money to one's own purposes	No; an initial transferee has no § 550(b) defense, and the court rejected the treat-every-recipient-as-a-transferee-then-excuse structure	Bonded Fin. Servs. v. European Am. Bank, 838 F.2d 890, 893–94 (7th Cir. 1988)	Boyer v. Carlton, Fields (In re USA Diversified Prods.), 100 F.3d 53 (7th Cir. 1996): a law firm was a transferee of the $14,000 fee it deducted, not of the balance, and was made to turn over the whole $125,000 as a possessor under § 542 without regard to dominion
Eighth	Dominion and control	No; good faith is the § 550(b) defense confined to recovery under § 550(a)(2)	Luker v. Reeves (In re Reeves), 65 F.3d 670, 676 (8th Cir. 1995); Sarachek v. Luana Sav. Bank, 859 F.3d 599, 604–05 (8th Cir. 2017)	None located. A payment routed through the debtor's lawyer as escrow agent is not immune from recovery as a preference (In re Interior Wood Prods., 986 F.2d 228, 231 (8th Cir. 1993)); the lawyer was not a party

Circuit	Test for the initial transferee	Good faith an element of escaping that status	Controlling decisions	Lawyer application
Ninth	Dominion only; the control test expressly declined, and a district court applying the Eleventh Circuit's test was reversed (Zazzali, 2017, unpublished)	No; the trustee's recovery from an initial transferee is absolute, and good faith lives in § 550(b) and (e)	Danning v. Miller (In re Bullion Reserve), 922 F.2d 544, 547 (9th Cir. 1991); In re Incomnet, 463 F.3d 1064, 1069–71 (9th Cir. 2006); In re Walldesign, 872 F.3d 954 (9th Cir. 2017)	Elliott v. Glushon, 390 F.2d 514 (9th Cir. 1967): counsel and escrow holder who received nothing not liable, under the former Bankruptcy Act. Farrar v. Warda & Yonano (In re Bella Vista by Paramont), 549 F. App'x 648 (9th Cir. 2013) (unpublished): the debtor's own counsel, paid from debtor funds, held the initial transferee in one sentence, the firm having advanced no credible argument otherwise
Tenth	Dominion and control: control over the funds and the right to put them to one's own purpose	No; the trustee may always recover from the initial transferee regardless of good faith, value, or lack of knowledge (Rupp)	Rupp v. Markgraf, 95 F.3d 936, 938 (10th Cir. 1996); Bailey v. Big Sky Motors (In re Ogden), 314 F.3d 1190, 1202, 1204 (10th Cir. 2002)	Ogden: a title-insurance agency that held $396,000 in a segregated trust file and released it on a false representation was a financial conduit, not a transferee. Rajala v. Spencer Fane, 964 F.3d 958 (10th Cir. 2020): law firms paid from the proceeds of an avoided transfer were not transferees of the property transferred. Klein v. King & King & Jones, 571 F. App'x 702 (10th Cir. 2014) (unpublished, Utah UFTA by analogy): a firm that received a $25,000 criminal-defense fee in two wires from the debtor's own account was the initial transferee and lost on reasonably equivalent value, good faith conceded
Eleventh	Control test: the first recipient is the initial transferee under the statute's literal terms, and mere-conduit status is an equitable exception that requires proof of no control and of good faith	Yes, expressly held (Harwell, 628 F.3d at 1322–23 & n.10); most circuits apply a dominion test in which good faith plays no part	Nordberg v. Societe Generale (In re Chase & Sanborn), 848 F.2d 1196, 1199 (11th Cir. 1988); Martinez v. Hutton (In re Harwell), 628 F.3d 1312 (11th Cir. 2010); Menotte v. United States (In re Custom Contractors), 745 F.3d 1342 (11th Cir. 2014)	Harwell: $500,000 of a debtor's settlement passed into and out of the lawyer's trust account the same day; the lawyer was the initial transferee under the statute's language, summary judgment for him was reversed, and on remand the bankruptcy court found he had not acted in good faith. Hyman v. Bast Amron (In re Cargo Transp. Servs.), 502 B.R. 875 (Bankr. M.D. Fla. 2013): a firm that took six $5,000 payments into its trust account, paid its court-approved fee, and remitted the balance was a mere conduit acting in good faith
D.C.	No circuit-level test located	Not decided	In re Subpoena Duces Tecum Served on the OCC, 156 F.3d 1279 (D.C. Cir. 1998) recites § 550(a)(1) only in an underlying suit	None located

Sources

The record behind each row of the chart, state by state: the statutes as published on the state's own legislature or code site (or, where a state publishes only through a commercial host, the source named), the decisions read in full, and the federal statutes. Where a cell states that nothing was located, the code chapters enumerated are named.

Alabama

Ala. Code §§ 8-9B-1 to 8-9B-16 (Uniform Voidable Transactions Act, transfers on or after Jan. 1, 2019; § 8-9B-16)
Ala. Code §§ 8-9A-7, 8-9A-8 (Alabama Uniform Fraudulent Transfer Act, 1989; transfers before 2019)
Folmar & Associates LLP v. Holberg, 776 So. 2d 112 (Ala. 2000)
Johns v. A.T. Stephens Enterprises, Inc., 815 So. 2d 511 (Ala. 2001); first appeal, 757 So. 2d 416 (Ala. 2000)

Alaska

AS 34.40.010 to 34.40.130 (fraudulent conveyances)
AS 34.40.110(e) (added as (f) by SB 354 § 21, ch. 105 SLA 1998; amended SB 344 § 10, ch. 82 SLA 2004)
Summers v. Hagen, 852 P.2d 1165 (Alaska 1993)
Merdes & Merdes, P.C. v. Leisnoi, Inc., 410 P.3d 398 (Alaska 2017)

Arizona

A.R.S. §§ 44-1007, 44-1008 (Uniform Fraudulent Transfer Act, 1990)
McElhanon v. Hing, 151 Ariz. 386, 728 P.2d 256 (App. 1985), aff'd in part and vacated in part on other grounds, 151 Ariz. 403, 728 P.2d 273 (1986)
Warne Investments, Ltd. v. Higgins, 219 Ariz. 186, 195 P.3d 645 (App. 2008)
Moore v. Browning, 203 Ariz. 102, 50 P.3d 852 (App. 2002)

Arkansas

Ark. Code Ann. §§ 4-59-207, 4-59-208 (Acts 1987, No. 967; conformed to the UVTA by Act 2017, No. 1086, eff. Aug. 1, 2017)

California

Cal. Civ. Code §§ 3439.07, 3439.08 (Stats. 2015, ch. 44 (SB 161), eff. Jan. 1, 2016)
Cal. Civ. Code § 1714.10
Optronic Technologies, Inc. v. Celestron Acquisition, LLC, 108 Cal. App. 5th 770 (2025)
Aghaian v. Minassian, 59 Cal. App. 5th 447 (2020)
Berger v. Varum, 35 Cal. App. 5th 1013 (2019)
Optional Capital, Inc. v. Akin Gump Strauss Hauer & Feld LLP, 18 Cal. App. 5th 95 (2017)
Chen v. Berenjian, 33 Cal. App. 5th 811 (2019)

Colorado

C.R.S. § 38-8-108(1)(c) (L. 2014, HB 14-1302; L. 2025, SB 25-133, eff. Aug. 6, 2025)
C.R.S. §§ 38-8-109, 38-8-111 (L. 1991)
Double Oak Construction, L.L.C. v. Cornerstone Development International, L.L.C., 97 P.3d 140, 146–49 (Colo. App. 2003), overruled on other grounds by L.H.M. Corp., TCD v. Martinez, 2021 CO 78

Connecticut

Conn. Gen. Stat. §§ 52-552h, 52-552i (P.A. 91-297, §§ 8, 9; § 52-552i amended P.A. 17-50, § 1)
Chapman Lumber, Inc. v. Tager, 288 Conn. 69, 952 A.2d 1 (2008)
Nastro v. D'Onofrio, 263 F. Supp. 2d 446 (D. Conn. 2003)
Litchfield Asset Management Corp. v. Howell, 70 Conn. App. 133, 799 A.2d 298, cert. denied, 261 Conn. 911 (2002)
Robinson v. Coughlin, 266 Conn. 1 (2003)
Scholz v. Epstein, 341 Conn. 1 (2021)

Delaware

6 Del. C. § 1307 (70 Del. Laws, c. 434; § 1307(c) added 72 Del. Laws, c. 226)
6 Del. C. § 1308(b)
Quadrant Structured Products Co. v. Vertin, 102 A.3d 155, 203 (Del. Ch. 2014)
Fringer v. Kersey Homes, Inc. (Del. Ch. June 25, 2018)
Edgewater Growth Capital Partners, L.P. v. H.I.G. Capital, Inc., 2010 WL 720150 (Del. Ch. Mar. 3, 2010)
Ortiz v. Ortiz, C.A. No. 2024-0692-CDW (Del. Ch. Mar. 31, 2025) (magistrate's report)
Trenwick America Litigation Trust v. Ernst & Young, L.L.P., 906 A.2d 168 (Del. Ch. 2006), aff'd sub nom. Trenwick Am. Litig. Tr. v. Billett, 931 A.2d 438 (Del. 2007) (table)
Crystallex International Corp. v. Petróleos de Venezuela, S.A., 879 F.3d 79 (3d Cir. 2018)

Florida

Fla. Stat. § 726.108 (s. 8, ch. 87-79)
Fla. Stat. § 726.109 (s. 9, ch. 87-79; s. 2, ch. 2013-189)
Fla. Stat. § 222.30
Freeman v. First Union National Bank, 865 So. 2d 1272 (Fla. 2004)
BankFirst v. UBS Paine Webber, Inc., 842 So. 2d 155 (Fla. 5th DCA 2003)
Danzas Taiwan, Ltd. v. Freeman, 868 So. 2d 537 (Fla. 3d DCA 2003)
Hansard Construction Corp. v. Rite Aid of Florida, Inc., 783 So. 2d 307 (Fla. 4th DCA 2001)
McCalla v. E.C. Kenyon Construction Co., 183 So. 3d 1192 (Fla. 1st DCA 2016)
SE Property Holdings, LLC v. Welch, 65 F.4th 1335 (11th Cir. 2023)
Martinez v. Hutton (In re Harwell), 628 F.3d 1312 (11th Cir. 2010)

Georgia

O.C.G.A. §§ 18-2-70, 18-2-77, 18-2-78 (Ga. L. 2015, p. 996, eff. July 1, 2015)
Both v. Frantz, 278 Ga. App. 556, 629 S.E.2d 427 (2006)

Hawaii

HRS §§ 651C-7, 651C-8 (L 1985, c 216)
Kekona v. Bornemann, 135 Haw. 254, 349 P.3d 361 (2015), vacating in part 130 Haw. 58, 305 P.3d 474 (App. 2013)
Kekona v. Abastillas, 113 Haw. 174, 150 P.3d 823 (2006)

Idaho

Idaho Code §§ 55-916, 55-917 (1987, ch. 202; 2015, ch. 342)

Illinois

740 ILCS 160/8, 160/9 (P.A. 86-814)

Indiana

Ind. Code §§ 32-18-2-17, 32-18-2-18 (P.L.2-2002, SEC.3; § 18 amended P.L.61-2017, SEC.16)

Iowa

Iowa Code §§ 684.7, 684.8 (2016 Acts, ch 1040, eff. July 1, 2016)

Kansas

K.S.A. 33-207, 33-208 (L. 1998, ch. 13, eff. Jan. 1, 1999)

Kentucky

KRS 378A.070, 378A.080 (S.B. 204, 2015 Ky. Acts ch. 37, eff. Jan. 1, 2016; repealing KRS 378.010, 378.020)

GATX Corp. v. Addington, 879 F. Supp. 2d 633 (E.D. Ky. 2012)

CNH Capital America LLC v. Hunt Tractor, Inc., 568 F. App'x 461 (6th Cir. 2014) (unpublished)

Bank of America, N.A. v. Corporex Cos., 99 F. Supp. 3d 708 (E.D. Ky. 2015)

Louisiana

La. Civ. Code arts. 2036 to 2043 (Acts 1984, No. 331, § 1, eff. Jan. 1, 1985; art. 2036 amended Acts 2003, No. 552; Acts 2004, No. 447)

Maine

14 M.R.S. §§ 3578, 3579 (PL 1985, c. 641; PL 1991, c. 114)

14 M.R.S. § 3155 (repealed by PL 1985, c. 641, § 2, eff. July 16, 1986)

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Maryland

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Massachusetts

Mass. Gen. Laws ch. 109A, §§ 8, 9 (St. 1996, c. 157)

Michigan

MCL 566.37, 566.38 (1998 PA 434; 2016 PA 552, eff. Apr. 10, 2017)

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A cell reading that no appellate decision was located states the result of a search of that state's appellate decisions and the federal courts sitting in it as of September 2026; it is not a holding. A federal court's reading of a state's law is marked as such. The opinions cited here are available on alperlaw.com.