

Representative Matters: Tax: Individual

- Advised and represented numerous individuals as to available options to come into compliance with reporting requirements for US persons with foreign accounts/holdings and assisting these persons with making submissions to the Internal Revenue Service ("IRS") under various versions of the IRS OVDP (offshore voluntary disclosure programs) as well as more lenient IRS streamlined offshore procedures.
- Assisted both individuals and entities with making domestic voluntary disclosures under both IRS and state programs/procedures.
- Represented and advised multiple taxpayers as to renunciation of US citizenship and impact of so-called exit tax as covered expatriates.
- Represented personal representative of decedent's estate in US Tax Court following estate tax examination with unresolved issue and achieved favorable resolution/settlement with IRS Appeals.
- Assisted family with inherited ranch land in selling property through Section 1031 like kind exchange and obtaining deferral of capital gains tax (both federal and state) of close to quarter of a million dollars.
- Worked with numerous wealthy non-resident non-citizens as to structuring investments in US real estate to minimize impact of federal taxes.
- Assisted US beneficiary of foreign trust, which was part of a multi-layer planning structure created by parent, to migrate the trust to the US, minimizing adverse tax consequences and future administration expenses and dealing with compliance problems arising from prior administration of trust.
- Advised foreign nationals on pre-immigration tax planning, including making non-taxable transfers to U.S. beneficiaries through complex structures and shedding foreign holding companies and other foreign assets that would create significant adverse US compliance burdens for parents and children upon parents' immigration.
- Advised foreign parent of US child on options for structuring transfer of complex and extensive business holdings to US dynasty trust for child so as to minimize or eliminate burdensome tax compliance issues for child and significantly reduce child's potential US tax exposure.