

Contact**Houston**

1200 Smith Street, Suite 1400
Houston, Texas 77002-4310
Tel: 713.658.1818
Fax: 713.658.2553

Atlanta

191 Peachtree Street, N.E.,
Forty-Sixth Floor
Atlanta, Georgia 30303
Tel: 404.659.1410
Fax: 404.659.1852

Philadelphia

300 Conshohocken State Road
Suite 570
West Conshohocken, PA 19428
Tel: 610.772.2300
Fax: 610.772.2305

San Antonio

112 East Pecan Street, Suite
1450
San Antonio, Texas 78205
Tel: 210.253.8383
Fax: 210.253.8384

International**International**

A well-planned tax strategy is essential for navigating the complexities of today's global business environment. Chamberlain Hrdlicka is known for our deep tax and legal experience and comprehensive understanding of U.S. international tax laws. We are highly skilled in offering bespoke solutions to clients with intricate cross-border tax planning needs. We represent a diverse range of domestic and international clients, from high-net-worth multinational families, cross-border individuals, investors, private equity funds, and multinational companies. Chamberlain Hrdlicka offers strategic guidance on tax planning in a wide range of industries with a focus on minimizing tax liabilities across jurisdictions.

In addition to our tax planning experience, we provide robust cross-border corporate, legal business support and counsel to clients operating internationally. Our team is proficient at resolving tax controversies; planning for cross border corporate and legal operations, addressing complex international issues; and defending taxpayers in international, state, and local tax audits. We also offer strong representation in government investigations, aiming to protect our clients' interests throughout every phase of tax compliance and dispute resolution.

Related PracticesInternational Tax

Chamberlain Hrdlicka was founded on its tax practice and the firm's expertise in this area served as a foundation for our subsequent growth. The strength in this field, coupled with the addition of key attorneys with diverse cross-border experience, created at Chamberlain Hrdlicka a robust international tax practice that has unmatched capabilities.

Our team has worked with various types of businesses operating in a wide range of countries on tax-related issues. Our international tax planning experience includes representation of multinational corporate clients operating in the international area in connection with cross-border transactions, in-bound transactions for foreign entities, out-bound transactions for U.S. entities and general tax advice in connection with U.S. entities' operations abroad. Specifically, we've been successful in:

- Minimizing tax costs on international operations by optimizing the use of the foreign tax credit and international tax treaties; and
- Capitalizing on tax deferral opportunities for foreign corporations and decreasing effective tax rates that apply under foreign tax laws in order to create deferral opportunities.

International, *Continued*

Additionally, our international tax team works with individuals and families in a wide range of tax planning activities. Foreign individuals often enlist our aid with tax planning involving foreign and domestic trusts. We also help clients in pre-immigration tax planning to minimize the impact of income, estate, and gift taxes. And if tax controversies arise, we then combine our international tax knowledge with our tax controversy capabilities to defend tax reporting positions involving international issues.

Immigration

Within Chamberlain Hrdlickas international practice group, our immigration team has considerable experience handling the entire spectrum of immigration matters for individuals, families, and businesses both in the U.S. and abroad. Our immigration attorneys have represented clients in all parts of the United States and in more than 100 countries.

Weve represented companies and non-profit organizations both in the U.S. and abroad in obtaining U.S. immigrant and non-immigrant visas through the employment, business, and investment categories, as well as in U.S. citizenship matters. Additional expertise includes employment cases, labor certifications, and consular work.

For individuals, weve handled a wide range of immigration matters including visa processing, naturalizations, and defense of removal (deportation) cases. And with support from the Tax Planning group, have assisted in pre-immigration tax planning.

While the constant change in U.S. immigration laws presents challenges for many in this area of work, our immigration attorneys are at the forefront of this rapidly changing field of law. As members of the American Immigration Lawyers Association and founding members of IMMLAW, Chamberlains immigration team actively participates in the exchange of ideas and information in emerging areas so that our clients can benefit from the most innovative techniques in the ever-changing immigration environment.

As part of our immigration practice, we also assist EB-5 regional centers around the country to prepare for audits, document their lawful sources of investment funds, and respond to data requests from regulatory authorities. We work to defend these government-approved entities against accusations of fraud and abuse, and counsel them to ensure they are in compliance with the EB-5 laws and regulations set forth by the Department of Homeland Securitys U.S. Citizenship and Immigration Services (USCIS) and Securities and Exchange Commission (SEC).

Cross-Border Finance & Investment

Modern-day realities require many businesses to operate far beyond their countries of origin. For many companies, international expansion of some form is necessary to compete in the global marketplace. Chamberlain Hrdlickas international finance and investment team assists clients in all international activities to help them maximize the opportunities that exist in cross-border business. Providing outbound planning for U.S. based organizations, inbound planning for foreign organizations, and cross-border business support and counsel, our attorneys serve as trusted advisors to clients as they take their business to the international level.

Operating with support from both the Corporate, Securities & Finance group and the Tax team, our attorneys work with U.S. companies and advise them on how to best structure an interest or participation in a foreign venture or investment. We also advise foreign clients on ways to structure their investments and business ventures in the United States.

International, Continued

Our attorneys have participated in a broad range of international negotiated transactions, representing clients in the U.S., Latin America, Europe, and Asia. In each of these regions, we've assisted in the planning, structuring, negotiating, and implementing of joint ventures, mergers, acquisitions, divestitures, commercial lending transactions, trade, financing, and contract matters.

What sets Chamberlain Hrdlicka apart in this field are the diverse backgrounds of our international practice attorneys. Each attorney's unique expertise enables the team to collectively address the challenges of cross-cultural financial matters and develop solutions customized for each client's needs.

