

## 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 Tax

### International Tax

#### Overview

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.

#### Capabilities

- Cross-border mergers and acquisitions.
- Establishing, acquiring, and/or disposing of entities in non-U.S. countries.
- Inbound investments into U.S. real estate.
- Structuring international joint ventures and restructuring multinational groups, with a specialty in closely-held companies.
- Private wealth, family office, and cross-border tax planning for multinational families, with cutting edge, private lettering requests with the Internal Revenue Service.
- Advise on treaty issues, foreign tax credits, and withholding taxes.
- Advise on cross-border leasing, licensing, and investing.
- Advise on international tax implications of cross-border intellectual property.
- Provide guidance on the application and compliance with the Foreign Account Tax Compliance Act (FATCA).
- Assist clients working with their CPAs and tax return preparers on the best U.S. international tax compliance strategies regarding the wide range of U.S. federal laws that impose information reporting on international transactions.

## International Tax, Continued

- Assist with international real estate acquisitions and developments outside the U.S., including joint ventures.
- Advise international artists, athletes, and entertainers on their cross-border flows of income, including concerts, royalty income, and services performed per treaties.
- Advise individuals on pre-immigration tax planning, prior to moving to the U.S.
- Advise individuals who want to renounce U.S. citizenship or otherwise abandon their lawful permanent residency (e.g., green card status; expatriation taxation).

### Why Chamberlain Hrdlicka?

Our team of dual-licensed attorneys offers both domestic and international legal insights essential for navigating complex cross-border tax issues, along with bilingual proficiency in drafting and negotiating business transactions. We also work with the clients team of Spanish-speaking advisors and client groups advising on all international tax planning matters.

With a strong emphasis on Latin American inbound and outbound tax planning, we leverage our position as a border state to Mexico to provide insight and bespoke international tax solutions to clients in the region. Additionally, our firms leadership role with ITAMs International Executive Tax Program in Mexico (along with the University of San Diego, School of Law) underscores our commitment to staying at the forefront of international tax developments. Our team helps our clients benefit from the latest developments in the law, can implement sound and legally defensible international tax strategies, and stay current on constant changes of U.S. and Treaty partners tax law. This blend of experience, geographic advantage, and educational collaboration positions Chamberlain Hrdlicka to deliver significant value to our clients.

### Key Contacts

Co-Team Leaders:

- Sébastien N. Chain
- Patrick W. Martin

