

# SPECIAL U.S. TAX COUNSEL IN CONNECTION WITH THE REDOMESTICATION OF A U.S. COMPANY

Hodgson Russ acts as special U.S. tax counsel for a U.S. publicly traded company in connection with the redomestication of the company from the United States to a Caribbean jurisdiction. Our services include providing the U.S. tax disclosure language for the company and its shareholders in various SEC documents, tax structuring advice to provide for nonrecognition treatment to U.S. and foreign shareholders in the redomestication (Code Sections 368, 367), and minimizing the potential adverse effect of the U.S. anti-inversion tax rules (Code Section 7874) and the interaction of the anti-inversion rules with the U.S. real estate (FIRPTA) tax rules applicable to foreign shareholders.

## **Attorneys**

Thomas Nelson

## **Practices & Industries**

Business Tax

International Tax

International-U.S. Cross-Border