

## U.S. TAX AND CORPORATE COUNSEL TO BUSINESS WITH BARBADOS-DOMICILED OWNER

Hodgson Russ acts as general U.S. tax counsel and corporate counsel to a business enterprise whose principal owner is domiciled in Barbados, which also involves family trusts owning shares for estate planning and creditor protection purposes, and whose business operations are divided between Barbados, the U.S. and Canada. Our services to this client include tax advice for structuring for ownership of intellectual property rights, structuring of business operations for payments from the U.S. to qualify for benefits under the U.S.-Canada Tax Treaty, planning for U.S. estate tax protection for foreign owners, and transfer pricing and other general U.S. tax advice.

## Attorneys

Thomas Nelson

## Practices & Industries

Canada-U.S. Cross-Border
International Tax
International-U.S. Cross-Border

