



INTERNATIONAL TAX ADVISORY AND SERVICES

JOHN ANTHONY CASTRO, J.D., LL.M. (TAX)

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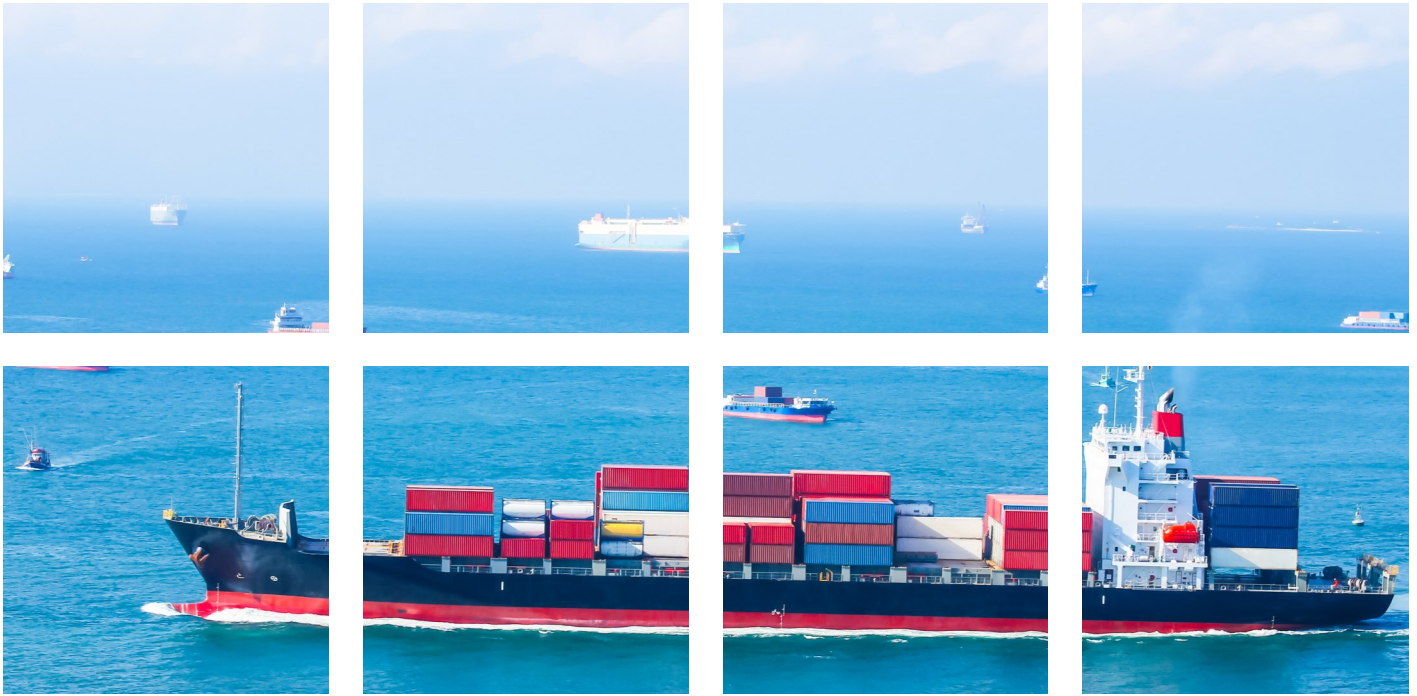
Qualified Tax Counsel for International Tax Matters

If you are a U.S. person with income, investments, or operations abroad, or if you are a non-U.S. person with income, investments, or operations in the U.S., John Anthony Castro understands that you are confronted with an array of international tax issues. Mr. Castro provides a full spectrum of tax services for his international tax clientele.

Given the complexity of today's international marketplace, sophisticated cross-border tax planning is of paramount importance. Governments worldwide are aggressively pursuing additional revenue, and crises-related restructurings pose new and difficult challenges for tax planning and dispute resolution. Mr. Castro understands the business and legal intricacies of international taxation and has an unmatched ability to design, implement, and defend international tax planning and structures.

Mr. Castro is consistently ranked as one of the most highly recognized and recommended experts for international tax matters in the U.S. He is in touch with changing tax laws, practices, and dispute resolution techniques around the globe and can help design, implement, and defend tax strategies for international operations and transactions.





International Tax Advisory and Services

Services Tailored to Your Goals and Values

Mr. Castro has strategic alliances with tax firms around the globe.

He provides clients with an unparalleled level of service and insight into the most challenging and complex of cross-border investments and transactions. Peers and clients alike recognize his talent for creative and innovative cross-border tax planning strategies. Mr. Castro enjoys a reputation for being committed to international services of the highest quality; focusing on practical business concerns and working with the time constraints of clients. He takes great pride in his ability to get transactions closed on schedule.

A few of his many strengths include, but are certainly not limited to:

- U.S. Investment in Foreign Countries (Outbound Investments)
- Foreign Investment in the U.S. (Inbound Investments)
- Subpart F Anti-Deferral and Controlled Foreign Company Rules
- Foreign Tax Credit Maximization and Substantiation
- Legal Avoidance of U.S. and Foreign Withholding Tax
- Cross-Border Acquisitions, Dispositions, Restructurings, and Joint Ventures
- Bilateral Tax Treaties
- International Tax Controversies

What follows is a more in-depth look at both the traditional and innovative cross-border tax services that Mr. Castro can offer you.



Mr. Castro advises domestic and foreign individuals and entities on the local, state, and federal tax laws applicable to conducting business in the United States and abroad.

International Tax Services

Mr. Castro is prepared to develop and analyze international tax planning strategies and transactions, international tax consequences of cross-border acquisitions and dispositions of businesses, dual consolidated losses, the maximum utilization and substantiation of foreign tax credits, Subpart F taxation, transfer pricing, VAT, the PFIC rules, sourcing of income, foreign individual domicile planning to avoid U.S. residency, and the FIRPTA rules.

Mr. Castro advises domestic and foreign individuals and entities on the local, state, and federal tax laws applicable to conducting business in the United States and abroad. From multinational companies with worldwide operations to small companies with foreign income or investments, he is prepared to serve as lead or associate tax counsel.

In planning for international tax matters, Mr. Castro has gained extensive knowledge of the laws of various foreign jurisdictions, including treaty and non-treaty countries in developed and emerging markets. He has extensive knowledge in pre-immigration tax planning and outbound expatriation, including drafting and structuring foreign and domestic trusts and worldwide tax compliance.

These are just some of the areas that Mr. Castro can help with:

- Advise U.S. taxpayers on acquiring foreign entities and structuring their foreign operations.
- Counsel clients regarding the establishment of U.S. entities and the acquisition of U.S. corporations, partnerships, and business assets by foreign companies.
- Advise sponsors and managers of U.S. and non-U.S. investment funds regarding both domestic and foreign tax issues.
- Advise on international transfer pricing.
- Assist with treaty issues, foreign tax credits, and withholding taxes.
- Assist in cross-border leasing, licensing and investing.

Structuring International Transactions, Operations, and Investments

If you are planning a cross-border transaction, operation, or investment, you must deal with a daunting array of U.S. tax rules. The structure you choose will have both immediate and long-term tax consequences, some of which are direct and obvious while others are indirect and hidden. Your choice of entities can be critical to your success and the “check-the-box” rules offer considerable planning opportunities in an international context. The international context also magnifies the importance of careful planning for corporate reorganizations because you not only must comply with the complex corporate reorganization rules, but you also must address outbound transfer, disposition, and other special rules.

Structuring international transactions, operations, and investments is an active segment of Mr. Castro’s practice. He advises taxpayers on tax-efficient structuring of cross-border investments, including beneficially structuring foreign subsidiary financing while retaining the interest deductions for U.S. tax purposes, transferring intangibles offshore, structuring cascading royalty arrangements, optimum use of tax treaties, foreign tax credits, tax deferral, and entity classifications. He also advises companies with established international operations on the tax aspects of cross-border reorganizations, as well as the year-by-year management of international tax exposures.

Mr. Castro works with clients on business structures for startups as well as expanding current operations for multinationals. This includes structuring cross-border distribution and purchase arrangements with a view to effectively manage worldwide taxation. He can advise on structures of sales and manufacturing operations in foreign countries to maximize the beneficial tax use of losses and to minimize taxation of transfers of assets outside the United States. He also advises foreign clientele on structuring their U.S. real estate investments to minimize withholding tax.

In addition, Mr. Castro structures operations to maximize opportunities for deferral of U.S. tax on foreign earnings. He can structure operations throughout the world, with a particular emphasis on Ireland and the Netherlands as well



Mr. Castro can structure operations throughout the world, with a particular emphasis on Ireland and the Netherlands as well as Canada, Mexico, Brazil, and Bermuda.



Mr. Castro is on the cutting edge of new tax planning ideas around the world.

In addition, he stays current with changes in the law and new opportunities around the world through frequent communication with foreign partner firms.

as Canada, Mexico, Brazil, and Bermuda. He can structure operations anywhere in the world.

He advises clients about the special tax rules that apply to multinational businesses operating abroad, including:

- The U.S. “Subpart F” and Similar Non-U.S.-Controlled Foreign Company Rules
- Foreign Tax Credits
- Tax Treaties
- Passive Foreign Investment Company Rules
- Intercompany Transfer Pricing
- Rules Limiting Deductions for Foreign Losses
- Foreign Currency Rules
- Stock and Asset Transfers
- Outbound Business Restructuring Rules

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If you are planning an international transaction, operation, or investment, Mr. Castro can:

- Advise on choice of entity issues.
- Help choose the most tax-efficient foreign situs consistent with your business needs.
- Prepare corporate, trust, or partnership documents and form the entity.
- Review foreign tax credit status and design credit-optimization strategies.
- Obtain advance rulings to ensure approval by relevant tax authorities.
- Aid with restructuring as business considerations or foreign tax rules change.
- Work to ensure that acquisitions, dispositions, and expansions are achieved in the most tax-efficient manner.

Restructuring Foreign Operations

As a result of changes in business climates, Mr. Castro is prepared to advise on matters concerning the restructuring of existing foreign operations with a particular focus on tax planning. This can involve sizing-down a business, changing the country of operation, restructuring operations to avoid having a U.S. trade or business or a permanent establishment under an applicable tax treaty, structuring foreign entities to avoid CFC status, structuring contract manufacturer arrangements for Subpart F purposes, planning for corporate inversion (expatriation) using the substantial business activities exception under section 7874, deferring the branch profits tax for a foreign corporation's U.S. branch through the use of asset loans, or converting to a pass-through entity to obtain tax benefits for foreign losses.

To meet client objectives, Mr. Castro can obtain tax rulings and work with other counsel to obtain all necessary rulings and clearances where he does not have his own office.

Effective Management of Worldwide Effective Tax Rate

Mr. Castro advises clients on ways to effectively manage their worldwide effective tax rates to the extent possible under applicable laws. Techniques include leveraging foreign subsidiaries to reduce foreign taxes, revamping intercompany pricing and royalty payments, contract manufacturing and other principal structures, cross-border leasing transactions and increasing low-taxed foreign source income to utilize excess foreign tax credits. In this regard, He can work with clients to develop capital structures and treasury management strategies that fit a company's non-tax business needs as well as its tax planning objectives.

Special Purpose Foreign Entities

Mr. Castro also advises clients on ways to utilize funds in foreign affiliates while minimizing U.S. and foreign taxation. His advice includes the organization of special purpose foreign entities, such as finance entities in tax-favored jurisdictions like Luxembourg, currency trading and hedging



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Mr. Castro's advice includes the organization of special purpose foreign entities, such as finance entities in tax-favored jurisdictions like Luxembourg.

centers, central warehouse and distribution facilities and headquarter-type offices, and back-office facilities in different geographic locations worldwide. He also work extensively on international financing matters, including international leasing transactions (*e.g.*, cross-border leasing of aircraft and large machinery), international financing transactions (*e.g.*, parallel loans, securities loans, back-to-back loans, Japanese four-sided Kagonuke loans and Samurai bonds) and various other planning ideas for moving funds across borders with minimal cost and maximum flexibility.

Advising on Withholding Tax Matters

If you are a foreign corporation or individual investing in the United States or a U.S. company making payments to foreign persons, chances are the recently-issued U.S. nonresident alien withholding regulations affect you. These new rules are voluminous and complex, and the consequences for failure to comply with their substantive or documentation requirements may be harsh. The withholding rules cannot be considered in a vacuum; you also need to understand how they interact with tax treaty provisions and with various anti-abuse rules, such as the "conduit" regulations.

If you are a foreign corporation or individual investing in the United States, Mr. Castro can help you understand the rules, structure your investments to minimize or even eliminate withholding tax, fully benefit from the portfolio interest exception, utilize finance subsidiaries in treaty-favored jurisdictions to attract global investors, and satisfy the complicated documentation requirements. If you are a U.S. withholding agent, he can help you comply with your withholding obligations and avoid liability.

- Analyze how the withholding rules apply to your facts.
- Structure your investments so as to eliminate or minimize withholding.
- Analyze how treaties impact your withholding obligations.
- Determine whether and how the conduit rules may affect your withholding obligations.

- Ensure that you comply with relevant regulation requirements.
- Negotiate Qualified Intermediary agreement with the IRS on your behalf.

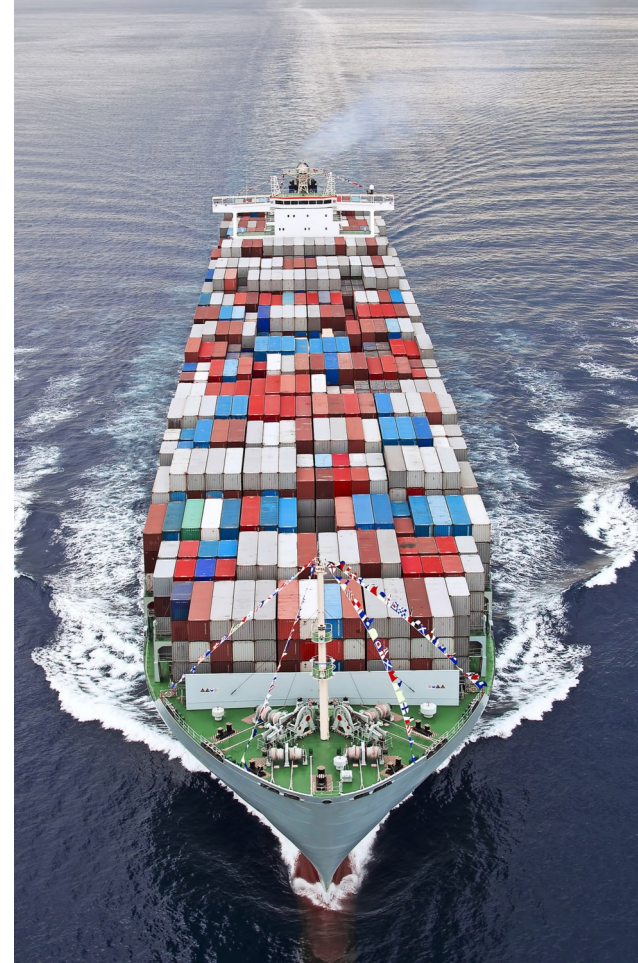
Structuring and Evaluating Financial Products

Companies involved in financial products (on the development side or as potential purchasers) know that such products, designed correctly, can provide competitive returns and aid in risk management while also providing creative solutions to a variety of tax concerns. This has made financial products an area of dynamic growth, particularly in the international setting where their value is frequently enhanced through the use of hybrid entities and hybrid transactions (*i.e.*, entities and transactions that are characterized differently for U.S. and foreign tax purposes), as well as through the use of a variety of notional principal contracts, sale-repurchase “repos” agreements, and other features. With the growth in this area, however, has come intense IRS and legislative scrutiny, thereby placing a premium on ensuring that the financial product is carefully designed from the outset.

Mr. Castro can assist clients in designing tax-advantaged financial products and in evaluating financial products designed by others. These products can be used for cross-border financing and achieve the U.S. tax benefits desired by the parties. He is also mindful of his duty to say “no” to ideas that do not work. Mr. Castro knows that cautioning clients against strategies that do not work is as important as helping them devise strategies that do.

If you are structuring or evaluating cross-border financial products, here are some of the ways that Mr. Castro can help:

- Evaluate existing financial product designs to determine whether they will accomplish U.S. tax objectives.
- Advise on alternative designs to maximize US tax benefits and the likelihood of achieving them.
- Prepare relevant transaction documents (*e.g.*, partnership agreement, swap agreement and



Mr. Castro has extensive in-depth knowledge regarding intercompany pricing issues in the United States, Europe, and Asia from both a planning standpoint and defense standpoint when there is a controversy with the relevant taxing authority.



Mr. Castro has reviewed scores of multi-million dollar transfer pricing cases and can counsel at every stage of the proceeding: IRS examination, Competent Authority, IRS Appeals, litigation, and the APA process.

confirmation, etc.).

- Prepare and file documents to organize appropriate U.S. entities (*e.g.*, LLC formation).
- Advise on the applicability of tax shelter registration, disclosure, and list maintenance requirements.

Trade, Custom Duties, and Value Added Tax

With regard to trade, custom duties, and value added tax matters, Mr. Castro can:

- Assist with customs planning in making an effort to maximize cost savings and identify potential claims.
- Assist with international VAT planning in relation to sales structures.
- Provide VAT advice regarding supply of goods and services.
- Advise on compliance with indirect tax obligations and transactions.

Maximizing and Substantiating Foreign Tax Credits

U.S. taxpayers concerned about avoiding double taxation and seeking to minimize their worldwide tax liability must be prepared to navigate a labyrinth of foreign tax credit rules in the Internal Revenue Code. The old challenges remain: determining which foreign levies qualify for the U.S. tax credit, which person is entitled to the credit, and the mechanics of calculating and applying the credit. Nowadays, however, taxpayers must also contend with IRS demands for substantiation and payment above and beyond what has been required historically. This makes it even more important to have tax counsel who knows both the written rules and IRS enforcement practice.

Mr. Castro has a wealth of knowledge and experience dealing with foreign tax credit qualification and substantiation issues. He has helped many taxpayers, and can help you, to structure operations to make the most of the foreign tax credit rules on a prospective basis, or to

defend your entitlement to foreign tax credits previously claimed.

He has advised taxpayers on utilizing the title passage rule to permit the full utilization of excess foreign tax credits and foreign E&P planning to increase the amount of indirect foreign tax credits associated with dividend distributions.

To make sure you get the most out of the foreign tax credit rules, Mr. Castro can:

- Evaluate which taxpayer, and which foreign levies, will qualify for the U.S. tax credit.
- Guide you through the “basket” characterization and calculation rules.
- Devise appropriate strategies to maximize your credits and to access excess credits.
- Advise you of the type of substantiation issues likely to arise.
- Defend your entitlement to claimed foreign tax credits at all stages of proceedings.
- Invoke Competent Authority assistance to support the creditability of a foreign tax and your entitlement to the credit.

Foreign Acquisitions and Dispositions

Mr. Castro can structure and negotiate acquisitions and dispositions of foreign companies; planning for the most tax-efficient structures from both U.S. and international business and tax viewpoints.

Issues may include stock versus asset purchases, whether to make a section 338 election to treat a stock transactions as an asset transaction, synthetic 338 “check-and-sell” arrangements, whether to effectuate a pre-sale income repatriation through a section 956 U.S. Property Investment to acquire indirect foreign tax credits, whether the acquired entity should be structured as a first-tier U.S.-owned foreign subsidiary or a lower-tier foreign-owned subsidiary, whether to utilize a leveraged holding company for an acquisition to reduce foreign taxes and maximize cash flow flexibility, and business entity choice.



Mr. Castro can structure and negotiate acquisitions and dispositions of foreign companies, planning for the most tax-efficient structures from both U.S. and international business and tax viewpoints.



Understanding and working with these treaties requires experience, because notwithstanding efforts to conform to a model, U.S. treaties differ from each other in important, often subtle, respects.

Interpreting Tax Treaties

The large and growing U.S. tax treaty network makes it likely that your company is entitled to benefits under one or more of the 50-plus U.S. tax treaties. Understanding and working with these treaties requires experience, because notwithstanding efforts to conform to a model, U.S. treaties differ from each other in important, often subtle, respects. And even seemingly simple questions common to all treaties, such as who is entitled to treaty benefits, can give rise to contentious and potentially costly disagreements with the IRS. In fact, some tax treaties do not limit who is entitled to its benefits, which further facilitates planning.

Mr. Castro covers both substantive legal issues and the administrative aspects of securing treaty benefits by filing appropriate forms or working with U.S. and foreign government officials. Mr. Castro is thoroughly familiar with all U.S. tax treaties currently in effect, and he works to ensure that his clients' concerns are brought to the government's attention during the treaty negotiation and re-negotiation processes through his alliance with reputable lobbying firms in Washington, DC.

If you are operating in a foreign jurisdiction within the U.S. tax treaty network, Mr. Castro can help:

- Ensure your eligibility for treaty benefits.
- Structure your operations to maximize the value of treaty benefits.
- Restructure your existing operations to avoid having a taxable permanent establishment.
- Advise on treaty interpretation and the applicability of treaty provisions to your transaction.
- Ensure that you satisfy any filing or information reporting requirements necessary to take advantage of treaty benefits.
- Invoke the Competent Authority process under a treaty.
- Make your concerns or the concerns of your industry known to the government officials who are negotiating or renegotiating a particular

Competent Authority Cases

The Competent Authority process is designed to help taxpayers like you avoid, or at least minimize, international double taxation, and to provide other forms of assistance to U.S. and foreign taxpayers in an international context. Many taxpayers are unfamiliar with the Competent Authority mechanism and do not understand on a practical level how the process works or how taxpayers can benefit from it.

Mr. Castro understands the Competent Authority process, knows the players, and can use the process to benefit his clients. He can work with the Competent Authorities around the globe, including Belgium, Canada, Germany, Japan, Mexico, the United Kingdom and, of course, the United States, to secure treaty benefits and to minimize double taxation for his clients.

If you are faced with the prospect of international double taxation, are concerned that the United States or a foreign country is imposing tax in a manner inconsistent with an income tax treaty, or need government assistance to obtain documents, Mr. Castro can help:

- Advise on prior experiences with the Competent Authority of the relevant country and the best strategy for obtaining the requested relief.
- Prepare written Competent Authority request for assistance, tailored to your situation and the formal (and informal) requirements of the relevant Authority.
- Meet with the appropriate U.S. and/or foreign government personnel to promote timely and favorable action on the Competent Authority request.
- Draft proposed Competent Authority ruling or agreement.

Intercompany Transfer Pricing

If your company has cross-border dealings with a related party, you probably know that transfer pricing enforcement is a high-profile and big-dollar audit priority for U.S. and foreign taxing authorities. Section 482 of the Internal



Mr. Castro can work with the Competent Authorities around the globe, including Belgium, Canada, Germany, Japan, Mexico, the United Kingdom and, of course, the United States, to secure treaty benefits and to minimize double taxation for clients.



If you are a foreign corporation or individual investing in the United States, Mr. Castro can help you understand the rules, structure your investments to eliminate or minimize withholding tax, and satisfy the complicated documentation requirements.

Revenue Code gives the IRS broad discretion to reallocate income by second-guessing your transfer prices and can make it challenging for taxpayers to overcome such adjustments.

Mr. Castro has extensive in-depth knowledge regarding intercompany pricing issues in the United States, Europe, and Asia from both a planning standpoint and defense standpoint when there is a controversy with the relevant taxing authority. He can provide multinational clients with advice concerning transfers of intangibles to foreign affiliates, services and intercompany transfer pricing matters, and can obtain advance pricing agreements in various jurisdictions. If intercompany pricing issues are raised by a taxing authority, he can defend clients at all stages of the administrative process. Mr. Castro's approach is to seek favorable settlements at the administrative level and to avoid litigation if possible. He can prepare detailed pricing reports, which require economic analyses and industry experts, as well as develop strategies to best present his client's position and the case to the taxing authority (and, if necessary, in court) in collaboration with senior economists and pricing specialists.

Mr. Castro can minimize the expense and burden of your transfer pricing disputes with the IRS. He has reviewed scores of multi-million dollar transfer pricing cases and can counsel at every stage of the proceeding: IRS examination, Competent Authority, IRS Appeals, litigation, and the APA process.

Mr. Castro can assist U.S. multinationals as well as multinationals based in major North American and European countries, Japan, and tax haven jurisdictions in nearly any industry, including, but not limited to, banking and financial products, pharmaceuticals, electronics, telecommunications, batteries, bearings, motorcycles, medical equipment, biotechnology, crude oil, oil field services, luxury items, industrial equipment, automotive components, fertilizer, and steel. The intercompany transfers have involved, either alone or in combination, the manufacture and/or distribution of tangible goods, the development, sale and/or licensing of intangibles, the incidental and/or regular provision of related-party services, and the making of loans.

Mr. Castro also helps clients in legislative and regulatory matters relating to section 482. He can counsel industry trade associations on potential application of proposed regulations and legislation, including preparation of comments and testimony and meetings with government officials. He also has extensive knowledge of and experience with section 6662 transfer pricing penalty protection documentation, as well as with the preparation of cost-sharing agreements for international groups.

If your company is facing an IRS transfer pricing adjustment, or if you want to minimize the likelihood of a transfer pricing adjustment in the future, Mr. Castro can help:

- Evaluate your transfer pricing exposure and advise on minimizing future exposure.
- Determine an appropriate transfer price or royalty rate for tangible and intangible property.
- Determine ownership of intangibles and establish research and development cost-share arrangements.
- Defend your transfer prices against adjustment and avoid double taxation through the Competent Authority process.
- Defend “at cost” administrative services and interest-free advances.
- Prepare Section 6662 transfer pricing reports.
- Pursue legislative and regulatory solutions to transfer pricing issues.
- Negotiate an advance pricing agreement with the IRS and foreign tax authorities.

Knowledge and Quality in Work Product

Mr. Castro has the knowledge, experience, and technical skills to advise, plan, and execute strategies on every aspect of international taxation.

With his worldwide network of foreign tax experts in every emerging and developed country around the world, you can enjoy the convenience of having centralized management and coordination of all of your worldwide tax planning and compliance matters.



Mr. Castro assists clients in designing tax-advantaged financial products and in evaluating financial products designed by others.



Mr. Castro has prepared and implemented countless estate plans for individuals, multigenerational families, and international clients using a broad range of sophisticated strategies and techniques, from traditional to esoteric.

Private Individual Client Services

Private Individual Tax Planning. Mr. Castro can substantially reduce your federal and state income tax liabilities. By structuring his clients' personal and business affairs in both a financially advantageous and tax-efficient manner, Mr. Castro's clients enjoy significantly lower effective federal income tax rates on their income, and, in some cases, his clients may legally avoid state taxation on capital gain through the use of properly structured Wyoming Incomplete Non-Grantor (WING) Trusts.

Mr. Castro provides private individual tax planning services in the following areas:

- International Income Tax Planning for Non-Residents with U.S.-Source Income
- International Income Tax Planning for U.S. Taxpayers' Foreign-Source Investment Income
- AMT Planning
- Offshore Tax Compliance (FATCA and FBAR)
- Planning for the Sale of a Closely-Held Company
- Inheritance Tax Planning
- Charitable Gift Planning
- Maximizing Tax Credits
- Deduction-Maximizing LLCs
- Retirement Tax Planning
- Roth IRAs for Children
- Tax-Efficient Saving for Children's College Education
- Stretch IRA Planning

Individual Expatriation Tax Planning. For U.S. citizens contemplating renunciation of their citizenship and certain long-term residents relinquishing their green cards, the U.S. may impose an "Exit Tax," which treats the individual as though they sold all of their worldwide assets in order to subject all of their built-in gain to U.S. taxation.

Thankfully, not all expatriates are covered by this general

rule. “Covered expatriates” are those that meet one of three tests: a five-year average federal income tax liability test, net worth test, or fail to certify compliance prior to expatriation. Even then, only built-in gain over a set threshold is subject to taxation.

Mr. Castro works with clients to plan for the minimization or complete avoidance of this tax through proper planning.

Some of the advanced options include retroactive income tax treaty elections, prospective income and net-worth reduction planning with irrevocable trusts, and an irrevocable tax-deferral election with letters of credit.

Multinational Estate Planning

International Estate Planning for Non-Citizens. For non-U.S. citizens that are current or former long-term residents of the U.S., estate planning is a multidisciplinary practice that requires knowledge of international tax, tax treaties, international conflict of laws principles, and foreign tax and estate planning law.

The U.S. federal income tax is imposed on the worldwide income of U.S. citizens as well as individuals residing in the U.S. regardless of immigration status. The U.S. estate tax, however, is imposed on the worldwide assets of U.S. domiciliaries as well as the U.S.-situated assets of non-domiciliaries. The difference between residency and domicile is a significant. For example, a non-U.S. citizen can reside in the United States for decades without ever being considered a U.S. domiciliary. Likewise, a non-U.S. citizen can reside in the United States for a single year and be deemed a U.S. domiciliary. In other words, proper planning will control the determination. Mr. Castro has the knowledge and experience that your complex estate requires.

Estate, Gift, and Generation-Skipping Transfer Tax Planning. For clients with taxable estates, Mr. Castro utilizes the most sophisticated planning methods to significantly reduce and manage your expected estate tax burden.

Most estates contain significantly valuable yet illiquid



For non-U.S. citizens that are current or former long-term residents of the U.S., estate planning is a multidisciplinary practice that requires knowledge of international tax, tax treaties, international conflict of laws principles, and foreign tax and estate planning law.



While Mr. Castro works on transferring the value of your estate to the next generation, he simultaneously works on ensuring that you remain in control of all your wealth during your lifetime.

assets, such as closely-held business interests and real estate, which means there will likely not be enough actual cash available for your family to pay the immediately resulting estate tax liability.

Some of the advanced options available for reducing and managing your family's estate tax burden are trust-owned life insurance, "Graegin" loans to provide liquidity to the estate, and a special election to defer estate taxation for 5 years followed by a 10-year installment plan.

Wealth Transfer Services. Mr. Castro assists high-net-worth clients to attain and maintain their financial and wealth planning goals through sophisticated wealth transfer arrangements.

He continually works with families and their advisors to devise and implement comprehensive plans that match and adjust to each family's distinct attributes.

Mr. Castro understands that wealth is built, protected, and transferred through a team effort. Therefore, he encourage each client to assemble a team of professionals who will collaboratively design and implement a plan that balances the current and future needs of the estate.

Some of the advanced wealth transfer devices available are an intentionally defective grantor dynasty trust for multi-generational planning, short-term zeroed-out grantor retained annuity trusts for rapidly appreciating assets, and captive insurance companies to extract up to \$1.2m each year from a closely-held family business on a tax-free basis.

Business Succession Planning. While Mr. Castro works on transferring the value of your estate to the next generation, he simultaneously works on ensuring that you remain in control of all your wealth during your lifetime.

By utilizing the tax-free nature of business restructurings, Mr. Castro can reorganize the capital structure of your closely-held family business in order to shift the value of your business to the next generation without sacrificing your control over the company.

Private Company Services. Mr. Castro represents privately and closely held companies in all aspects of their business operations.

Mr. Castro guides family business owners through the entire life cycle of their company, from entity formation, financing and corporate governance issues to tax planning, transfer of wealth and business succession planning.

His priority is to manage your business objectives alongside your personal goals to create a seamless plan that accomplishes both.

Domestic and Offshore Asset Protection. For business owners and professionals, the risk of lawsuits, malpractice, and personal liability is a daily concern. Corporate stock is always subject to potential seizure for personal liabilities. For clients in states where a “charging order” is the only remedy for a creditor, a tax-free Type F Reorganization coupled with a highly customized LLC Operating Agreement will suffice. For client in states where a “charging order” is not the sole remedy, creditors may foreclose on the LLC interest and effectively seize your company.

For these reasons, Mr. Castro works with clients to fireproof their wealth. By settling a domestic or offshore asset protection trust, clients can have “peace of mind” knowing that their personal assets will never be subject to judicial seizure.

Offshore Tax Compliance. Mr. Castro counsels individuals on the unique tax consequences associated with their foreign investments.

If engaged prior to the investment, he can counsel on how to properly structure and report the investment to minimize the associated tax obligations while complying with current tax laws, such as FATCA and FBAR. If engaged after the investment, he can restructure and resolve all compliance issues associated with the investment.

Offshore Private Placement Life Insurance. Private Placement Life Insurance is a sophisticated tax product that is essentially an investment portfolio inside of a life insurance policy. By building an investment portfolio inside of an insurance policy in a regulatory-friendly jurisdiction like Luxembourg, high net worth clientele are able to transfer the entire appreciated value of the portfolio to their heirs with no form of taxation whatsoever.



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Contact



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Education

- Georgetown University Law Center
Master of Laws (LL.M.) in Taxation, Certificate in International Taxation
- University of New Mexico School of Law
Doctor of Jurisprudence (J.D.)

Mr. Castro is an active member of the International Bar Association, International Tax Planning Association, Society of Trust and Estate Practitioners, National Association of Tax Professionals, American Bar Association, and the WealthCounsel Network.