



The Tax Section presents

Restructuring Foreign Investments in U.S. Real Property

Tuesday
February 26, 2019

MCLE Registration: 11:30 a.m. - 12:00 p.m.

Program: 12:00 - 1:15 p.m.

Speakers

Brian Rowbotham

Crowe, LLP

Peter Trieu

Crowe, LLP

Tax Cuts and Jobs Acts significantly lowered the corporate tax rate. Such rate significantly impacts the traditional recommendation for how nonresidents of the U.S. should hold their real estate investments in the U.S. While prior structures provided tax efficiency with some risks, the new paradigm provides the same tax efficiencies with no such risks.

Topics

- Tax reform impact on structuring acquisitions of commercial and residential properties
- Commonly used structures with U.S. and foreign holding companies
- Estate and gift tax planning
- Use of portfolio debt
- Withholding tax issues – Federal and State.

Section Chair: William Gorrod, Morrison & Foerster LLP

Register online: www.sfbars.org/calendar or complete form below.

MCLE: 1 Hour

To receive MCLE credit, you must sign in during the designated MCLE registration period. This activity is approved for Minimum Continuing Legal Education credit by the State Bar of California. BASF is a certified provider.

Provider #103

Location

Bar Association of San Francisco
301 Battery Street, 3rd Floor
San Francisco, CA 94111

Cost

\$30 BASF Section Members

\$40 BASF Members, Government &

Nonprofit Attorneys

\$55 Others

Free for BASF Student Members

All prices increase \$10 on the day of the program.

This is a brown bag luncheon.

Event Code: G190702

BASF Members:

Be sure to log in to get your discounts!

Refunds will be given up to 48 hours in advance, less a \$10 handling fee.

Special Requests:

People with disabilities should contact BASF regarding reasonable accommodations.

CLE Webcast: www.sfbars.org/online-cle



Live



Recorded

Available March 10