Christopher D. Saddock

Attorney

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Biography

Chris Saddock practices business and individual tax planning for high-net-worth individuals and closely-held corporations and partnerships. Chris has an extensive history serving private clients as a tax and business adviser by preparing and implementing complex business and holding structures, as well as maximizing tax efficiencies and ensuring compliance. His areas of practice include U.S. passthrough entity planning, U.S. trust and estate tax planning, mergers and acquisitions, fund formation, startups, cryptocurrency, and international income and estate tax planning.

Education

- L.L.M., Taxation, Georgetown University Law Center
- J.D., Southern Methodist University, Dedman School of Law
- B.S., Business & Communications Studies, The University of Texas at Austin

Admissions

- State Bar of Texas
- State Bar of New York

Practice Areas

- Income & Estate Tax
- International Tax
- Estate & Trust Planning
- Charitable Planning
- Tax Controversies

Representative Work

U.S. Tax Planning

- U.S. income tax planning: reorganization of holding structure for U.K. multinational company with U.S. citizens

- U.S. redemption planning for large subchapter S Corporation, asset acquisitions ranging from $5MM - $200MM, mergers of private entities with values up to $150MM, SAFE agreement and Convertible note planning, qualified opportunity zone fund formation, tax consequences of cryptocurrency transactions

U.S. Real Estate Tax Planning

- Formation of South Dakota directed trusts, Wyoming Private Trust Companies with underlying trust, U.S. estate tax exclusion gift planning, SLAT planning, GRAT formation and termination, loan planning

U.S. Charitable Planning

- Private Foundation, Public Charity, Donor Advised Fund formation, corporate blocker planning, charitable contribution planning including CLATS and CRUTS

Controversies

- Estate tax audits for large estates, U.S. immigration audit with up to $200MM amount in controversy, U.S. Voluntary Disclosures for taxable amounts up to $50MM, closely-held entity audits including S and C corporations, partnerships, LLCs treated as partnerships, and disregarded entities, non-US international voluntary disclosure experience

International Tax Planning

- Tax planning for U.S. inversion transactions including: 1) a large U.S.-based energy company which reorganized under Irish parent, and applied Japanese treaty benefits, 2) a U.S.-based consulting company which merged with a U.K. parent through a new Irish holding company, and 3) a logistics company in Australia acquiring U.S. corporate subsidiaries through an Irish holding company
- U.S. income tax planning for owner of U.K. music catalog corporation with Irish subsidiary. Utilized Irish holding company to minimize U.K. and U.S. income taxes
- Pre-immigration planning for Denmark company with shareholders moving to the U.S. Utilized Irish holding company and warrants issued by Luxembourg related entity for strategic share purchases. Issues related to Denmark and U.S. taxes, including treaty considerations
- Extensive experience planning and representing non-U.S. investors with U.S. income producing assets and U.S. nexus
- Represented Venezuelan family with U.S. real estate assets regarding income and estate tax issues, and applied U.S.-Venezuelan income tax treaty
- Hybrid entity planning for foreign investor owning board seats on U.S. subsidiaries; related analysis of management and control tests

U.S. Treaty Planning and Transaction Review

- Represented Indian families with investments in Malta for U.S. and Indian tax optimization for closely held business structures
- Represented large Dubai funds with U.S. investments through foreign blocker corporations, including minimizing management authority and control while maintaining board seats where possible

U.S. up-C reorganization for Partnership IPO with Foreign Partners

Estate and Trust Planning for U.S. and Foreign Individuals and Entities

- Extensive U.S. income, trust and estate tax planning for Latin and South American clients from Mexico, Colombia, Brazil, Peru, and Venezuela for families with nonresident grantors who were either becoming U.S. citizens or residents or who had children doing so

- Extensive experience with international holding structures including corporations in Ireland, the Cayman Islands, Panama, the British Virgin Islands, the Isle of Man, Liechtenstein and Luxembourg held by trust structures located in South Dakota (treated as foreign trusts), Bermuda, Jersey, Guernsey, New Zealand, and the Netherland Antilles
- Transfer of trusts and underlying companies to U.S.-foreign grantor trust structures in South Dakota. Ownership and transfers of U.S. real estate and FIRPTA regulations
- U.S. income tax planning and expatriation planning for accidental Americans, including reporting of U.S. and foreign assets, international restructurings related to tax optimization in the U.K., Colombia, Brazil, Mexico, France and Canada

Affiliations

- Justice Advocate, International Justice Mission, Dallas banquet planning committee
- Pro bono representation of human trafficking victims in U.S. Tax controversies