SERVICES FOR **FUNDS**

clients
we are passionate about our clients

technical
we value technical excellence

deliver
we deliver on our commitments

teamwork
we respect and collaborate with each other through teamwork

vision
we embrace the vision

The US Tax & Financial Services specialist team of cross border advisors provides tax advice, guidance, planning and compliance services for individuals, partnerships, corporations, trusts and estates for anyone subjected to the US tax system, wherever they may be in the world. Established more than 25 years ago, US Tax & Financial has offices in London, Zurich and Geneva with clients in more than 32 countries.

US TAX

Our Part in the Funds Universe

The United States remains a favorite location for both domestic and international investors. With its extremely complex tax system, investment returns can be seriously reduced with poor tax planning or a lack of understanding of the ins and outs of the unwieldy Internal Revenue Code. For the US investors who wish to venture into the international markets, the US tax system has hidden obstacles around every corner which can catch the uninitiated unaware and often at a great cost.

At US Tax & Financial services, we have a highly experienced and dedicated team of fund-focused tax professionals with a proven track record of delivery spanning almost 30 years, located in our European offices headquartered in London. We assist investment fund clients to maximize after-tax cash flows, help tailor their structures for operational efficiency, and ensure a clean exit.

With the continuing statutory and regulatory changes, the rising cost of compliance is an increasingly important consideration for fund administration. We offer clients a fee-sensitive US tax compliance solution while ensuring they meet all fund reporting requirements.

Whether you are looking to establish a new fund, raise new capital, satisfy compliance reporting requirements, or plan an exit, we can proactively help you with a personalized service at every stage of a fund's lifecycle.

We work with many different types of funds including:

- Private Equity Funds
- Venture Capital Funds
- Hedge Funds
- Real Estate Funds

Our Services

ADVISORY

- Structuring the Investment (Equity vs Debt)
- Planning for the Exit
- Limitations on Attributes (Deductibility of losses)
- Buy-Side Due Diligence (Tax exposures)
- Recommendations

COMPLIANCE

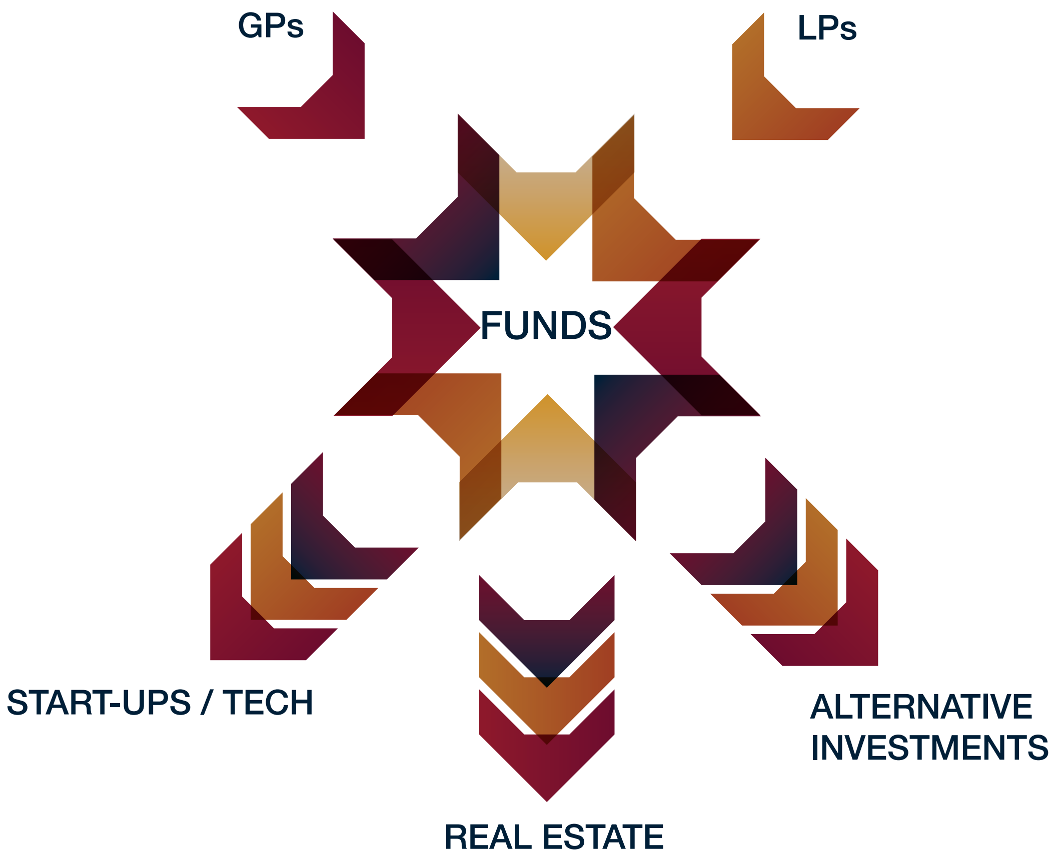
- Federal and state tax returns
- K-1 preparation and distribution
- Passive Foreign Investment Company (PFIC) Annual Information Statements and related shareholder allocations (Form 8621)
- Determination of Unrelated Business Taxable Income ("UBTI") and calculations
- Foreign Bank Account Reports (FBAR), FinCen Form 114
- Foreign Corporations (Form 5471),
- Foreign Partnerships (Form 8865) and
- Foreign Disregarded Entities (Form 8858)

FATCA

- Due diligence
- Foreign Financial Institutions (FFI) registration via IRS portal
- Obtaining Global Intermediary Identification Number (GIIN)
- Entity Classification for normal and FATCA withholding
- Annual reporting for all jurisdictions

Fund Formation

Tax efficiency of an investment fund can be easily accomplished at the time of setup providing the optimal deal structure tailored to your investments and to your investors. We take into consideration geographic locations of a fund's assets and investor base in order to minimize tax leakage and maximize after-tax return to investors. Our team provides technical solutions to issues arising in the course of transactions including acquisitions, restructurings and planning for ultimate dispositions.



US Expansion Support

Some of our fund clients invest in fast growing tech start-ups and emerging breakout companies as part of their portfolios. Passionate entrepreneurs can come from anywhere and those with global ambitions often look to the United States as a key place to fuel their next stage of growth.

TECH fin tech BiG DATA life science

Ready for Global Growth?

Following the innovative game changers and global digital revolution of the last 20 years, entrepreneurs launching start-ups on tech platforms around the world have unprecedented opportunities to reach new markets. With its large consumer market, world class talent network, vibrant support infrastructure and large pool of capital, the United States remains one of the most attractive markets for any start-up that wants to go ‘global’. From our company headquarters in London we have witnessed this revolution enthusiastically engage the UK and beyond during the last three years in a thriving, exciting and vibrant community based outside the Silicon Valley.

We are proud to actively support the start-up community in London and throughout Europe. As part of the ecosystem, we mentor entrepreneurs on how to navigate the complex US tax landscape by gaining an understanding of their aim of expanding into the US market - whether that starts as selling products and services to US customers, opening offices on the ground or obtaining US investment.

Considering the multi-state landscape of the US market, we develop a tax structure that will:

- Lower tax exposure to the parent company
- Minimize the group's overall tax liability
- Determine US Effectively Connected Income and sources of income
- Assist with transfer pricing
- Assess state tax liability
- Analyze Permanent Establishment position

We also:

- Advise on cloud service implications
- Advise on locations & IP
- Provide reporting

We have a dedicated team of lawyers that have extensive experience with treaty law to ensure our clients gain double taxation relief.

We will help get your portfolio companies set up in the best way to support their dreams.

Meet Our Funds Team

BRADLEY ALBIN

International Corporate Tax Director

Brad is a lawyer with over 15 years' US domestic and international tax experience. He advises on corporate structures, private investors, venture capitalists and hedge funds. He has Big 4 experience in both the US and Europe working with large multinational companies as well as fast growth companies on US corporate and international tax topics, both inbound and outbound. At PwC, working in Silicon Valley, he assisted in the due diligence process and structuring of acquisitions for clients ranging from start-ups to Fortune 500 companies and large venture capital firms. He regularly mentors early stage companies.

DAVID M. DALEY

Private Client Tax Director

Dave has over 20 years' tax consulting experience. As a tax partner with Arthur Andersen Dave had overall responsibility for delivering tax and financial consulting and compliance services to clients ranging in size from start-ups to multinational public companies. He assists businesses in all areas of tax and financial planning including inter-company pricing studies, multinational tax planning, mergers and acquisitions, compensation and benefits, financial aspects of bankruptcy, and utilization of acquired net operating losses.

ANDREW ALDRIDGE

Tax Director

Andrew has over 40 years' domestic and international tax experience. Prior to joining US Tax & Financial he served as Manager of the Tax Department of Commercial Financial Services, Inc., a major debt resolution company in the US, where he was responsible for the worldwide tax affairs of the company. He also worked for over 18 years with Phillips Petroleum Company, a Fortune 50 energy company, where he served in both the tax and legal departments. During this time he spent over five years in the UK as Tax Counsel for Phillips, focusing primarily on international financing issues. Andrew's focus is primarily on international income tax and trust and estate planning for US Tax clients.

Our Participating Network: