

## Eva Farkas-DiNardo

PARTNER | NEW YORK

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### Eva is a partner in the private client and tax team.

She focuses on personal and business tax planning for high net worth individuals and their closely-held companies, and advises clients on a wide range of US and international tax issues, including matters such as pre-immigration planning and expatriations, planning with trusts, real estate transactions, withholding tax, information reporting, tax return filing obligations, and related areas. She is also heavily involved in advising clients on voluntary disclosure matters and streamlined filing programs and also has experience with audits and examinations of individuals.

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## Track record

### Philanthropic planning

Assisted a wealthy international family with philanthropic planning and helped establish a charitable foundation to centralize their charitable giving efforts worldwide. We helped select a jurisdiction and local service providers to find the best tailored solution for the family.

## Expatriation from the US and tax efficiency

Advised several international clients with accidental US citizenship on their expatriation process from the US to ensure tax efficiency while maintaining compliance with all US rules and requirements.

## Pre-immigration planning

Assisted a wealthy international family on their pre-immigration planning as part of their move to the US and continue to provide advice on a multitude of issues, ranging from trust planning to US tax compliance.

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## Talks

- 'The OECD on CRS Anti-Avoidance,' Advising Latin American Families in a Transparent World - June 21, 2018, speaker

## External publications

'The Focus of the IRS Global High-Wealth Group,' Tax Notes - March 1, 2021, co-author

'The Corporate Transparency Act: A new US federal reporting requirement for beneficial owners of US entities,' Withers Insight - January 4, 2021, co-author

'Expatriation and Compliance: What You Need to Know Now', Tax Notes International - May 21, 2018

'Treasury's Investigation of U.S. Clients of Swiss Banks', Corporate Business Taxation Monthly - February 2009, co-author

'New Internal Revenue Manual Section on Auditing U.S. Withholding Agents', Practical U.S./Int'l Tax Strategies - October 2008, co-author

'Examining the Alcatel-Lucent and Daimler-Chrysler Mergers', Corporate Business Taxation Monthly - June 2006, co-author

'Authorities Learn from Market on Taxation of Credit Default Swaps', Int'l Tax Review - Cap. Markets, 9th Ed. - April 2006

'Is the Nation of Immigrants Punishing Its Emigrants: A Critical Review of the Expatriation Rules Revised by The American Jobs Creation Act of 2004', Florida Tax Review, Vol. 7:1 - September 2005

'Internal Revenue Service Issues New Partnership Withholding Rules', BNA Tax Management - June 2005, co-author

'Ruling Restricts Ability of Foreign Corporations to Use U.S. Treaty Benefits', Int'l Tax Review - September 2004, co-author

## Admissions

State of New York, 2003

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## Education

Fordham University College of Business Administration, B.S.

Fordham University School of Law, J.D.

## Languages

English  
Hungarian

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## Memberships

American Bar Association  
US-Austrian Chamber of Commerce

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## Key dates

Year joined: 2010

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