

Bruce E. Hood

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Bruce is a partner in the international corporate tax team.

He represents clients on taxation matters at the federal, state and local levels, principally in international, real estate, corporate and partnership taxation. He has advised clients on taxable and tax-free mergers and acquisitions, partnership formation and restructuring, pre-immigration tax planning, tax-free exchanges of real estate, REIT formation and operation. Bruce also has significant experience in FIRPTA planning, compliance and all types of matters pertaining to income tax treaties.

The Dutch and South American regions have been major areas of concentration for Bruce's active role in the firm's Latin American and European teams.

His clients include high net worth individuals and their businesses as well as a number of the world's largest pension funds.

SECRETARY **JAYME MCVEIGH**

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TRACK RECORD

Advised Netherlands-based Schiphol Group in connection with the construction and operation of Terminal 4 at JFK International Airport in New York City as well as the subsequent restructuring of its ownership consortium.

ADMISSIONS

- State of South Carolina, 1977
- District of Columbia, 1982
- State of New York, 1984

PUBLICATIONS

'IRS releases final rules on Section 965 repatriation taxes,' Accounting Today - January 22, 2019

'Impact of State and Local Taxes on Foreign Investment in US Real Estate,' AFIRE Guide to US Real Estate Investing: Chapter 26 - January 2016

'Taxation of Liquidating REIT Distributions to be Challenged by the IRS,' Association of Foreign Investors in Real Estate, AFIRE News - July/August 2007

'Tax-Attribute Carryforwards of Inactive US Real Estate: Holding Companies – A Valuable and Often-Overlooked Asset,' Association of Foreign Investors in Real Estate, AFIRE News - January/February 2006

'Withholding Tax Issues for Foreign Investors in REIT's,' AFIRE Newsletter - September/October 2004

MEMBERSHIPS

- American Bar Association
- International Fiscal Association
- New York State Bar Tax Section

EDUCATION

Fairleigh Dickinson University, summa cum laude, B.A.
New York University School of Law, LL.M.
University of South Carolina School of Law, cum laude, J.D.

LANGUAGES

ENGLISH

DATES

JOINED: 2015

RECOGNITION

2021 Martindale-Hubbell US AV Rating Bruce Hood	2019 Martindale-Hubbell US AV Rating Bruce Hood	2017 Martindale-Hubbell US AV Rating Bruce Hood	2016 Martindale-Hubbell US AV Rating Bruce Hood
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