



## U.S. & International Tax Transactions

# Strategic Transactions

Doing business across multiple jurisdictions is now the norm — and so are the tax consequences. At Kilpatrick Townsend, we advise clients — startups to Fortune 100 global companies — on a broad range of business transactions in the U.S., cross border, and overseas. Our U.S.-based services include mergers and acquisitions, dispositions, corporate restructurings, joint ventures, real estate transactions, spinoffs and other corporate separations, corporate formations, financings (including structured and leveraged finance), and renewable energy transactions. To help our cross-border and non-U.S. clients minimize their worldwide tax costs, we structure many diverse U.S. inbound and outbound transactions — under both U.S. federal and non-U.S. tax systems — including tax planning for expanding operations, acquisitions and joint ventures, off-shore financing techniques, and cross-border securities offerings.

## Experience

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Acted as special tax counsel in structuring a merger and spinoff transaction for a commercial bank.

Counseled client on the preservation of tax attributes in the Chapter 11 bankruptcy of a portfolio company.

Advised a U.S.-based company on refinancing approximately \$3.5 billion of debt of a recently acquired target, including (1) an exchange offer to substitute debt of the acquirer for debt of the target; (2) a cash tender offer of some of the acquirer's debt issued in the exchange; and (3) a termination of an interest rate hedging transaction with respect to the target indebtedness.

Advised a major construction products company on the acquisition of a major strategic target in a deal valued at \$1.4 billion.

Advised CRH plc, a major construction products company, on the disposition of its U.S. distribution company in a deal valued at \$2.7 billion.

Advised CRH plc, a major construction products company, on the strategic acquisition of a cement company in a deal valued at \$3.2 billion.

Advised a Fortune 50 telecommunications company in a joint venture acquisition of a key technology vendor.

Acted as special tax counsel in structuring a merger transaction for a commercial bank valued at \$489 million.

## Primary Contacts

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