



Renan Rodriguez

SENIOR ASSOCIATE

THE LINK VIRTUAL OFFICE

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OVERVIEW

Rey provides guidance to clients on U.S. federal income tax matters related to domestic and cross-border mergers, acquisitions, spin-offs, other disposition strategies, restructurings, acquisition financing, and the use of pass-through entities in both acquisitive and divisive transactions, with a particular focus on partnerships, corporate, and international tax planning. He practices from Naples as a member of our virtual office, The Link.

Rey advises clients on a variety of transactional matters, including mergers and acquisitions, distribution structures, internal reorganizations, and cross-border transactions. He also assists clients with both inbound and outbound investments involving the U.S., aiming to address the business and tax considerations that arise in these contexts.

Rey advises private equity sponsors through all aspects of buying and selling assets, with a specialized focus on optimizing tax benefits, structuring tax-efficient rollovers, and managing both stock and asset acquisitions, including tax-free reorganizations and restructurings. Rey is also experienced in fund formation for both domestic and international sponsors, where he helps structure management fees and carried interest, improve tax outcomes for fund executives, and design fund structures to help reduce tax burdens for investors.

Industry

Financial Services & Capital Markets

Services

Alternative Investments

Capital Markets

Corporate

Crypto, Digital Assets, & Blockchain

Federal Tax Planning

International Tax

Mergers & Acquisitions

Private Equity

Special Situations & Opportunistic Investing

Tax

Tax Controversy

Additionally, Rey advises multijurisdictional families on inbound investment planning. He works with individuals investing in the U.S., trustees of trusts with U.S. beneficiaries, families with members in different countries, and those relocating to or from the U.S. Rey also assists in establishing family offices, private trust companies, and charitable vehicles to help clients achieve their philanthropic objectives

Experience

- Advised on tax implications for:
 - Brookfield Asset Management Inc. (n/k/a Brookfield Corporation) in connection with the spin-off of a 25% interest in its asset management business through a newly listed company, Brookfield Asset Management Ltd., with a market value of more than \$50 billion as of the spin-off date.
 - MSP Recovery, LLC in its \$32.6 billion business combination with Lionheart Acquisition Corp. II.
 - Aman Group S.a.r.l. in its sale of a \$900 million minority stake to Cain International and the Public Investment Fund, in a transaction that valued Aman at \$3 billion.
 - AltC Acquisition Corp., a SPAC sponsored by AltC Sponsor LLC (an affiliate of M. Klein and Company, LLC), in its \$850 million business combination with Oklo Inc as of the agreement date.
 - Fidelity National Financial, Inc. in an \$800 million senior unsecured revolving facility.
 - F&G Annuities & Life, Inc. in a \$550 million unsecured revolving facility and in a \$750 million unsecured revolving facility.
 - Goldman Sachs in the sale of its Personal Financial Management unit to wealth management firm Creative Planning.
 - BCI, in the sale of its interest, alongside ATL and Audax, of Pilot Freight Services LLC to AP Moller – Maersk A/S.
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Education

- LL.M., Georgetown University Law Center
 - Taxation (with distinction)
- J.D., University of Miami School of Law
- B.A., Florida International University
 - *summa cum laude*

Admissions

- Florida
- District of Columbia
- New York

Community Leadership

Rey prioritizes pro bono work and has assisted nonprofits with their establishment and tax-exempt status. He has also provided pro bono tax assistance to underserved and underrepresented individuals in his local community through Legal Services of Greater Miami.

*Renan works remotely and is licensed in Florida, practicing in Naples, FL. Contact Renan via email or phone for in-person/virtual meetings. Use the Washington, DC office address for mail/deliveries only.



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