

# Susan F. Klein, Partner

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OFFICE: **Chicago**

PRACTICE TEAMS: **International, Tax, Financial Services, Real Estate, Private Client, Technology**

AREAS OF FOCUS: **Cross-Border Estate & Family Wealth Planning, International Transactions, International Tax, Private Investment Funds, Startups & Startup Financing, Corporate and International Tax, Registered Investment Companies, Mergers & Acquisitions, Israel, Latin America/Caribbean, Europe**



## PROFESSIONAL EXPERIENCE

Susan Klein focuses her practice on tax matters relating to private international transactions, including mergers, acquisitions and dispositions of businesses, entity formations, venture capital, financial services taxation, tax controversies, and counseling with respect to complex real estate transactions. She has extensive experience advising individuals and companies with respect to their investments and business operations in Canada, Western Europe, and Israel.

Susan also represents foreign nationals and corporations in connection with U.S. investments, licensing operations, acquisitions, joint venture participations, and estate planning, and individuals and businesses in connection with foreign investments and operations. She represents multinational groups (including foreign financial institutions) in connection with compliance with their obligations under the Foreign Account Tax Compliance Act (FATCA), counsels domestic and international businesses on transfer pricing issues, and participates in structuring of and tax planning with respect to the operations of offshore hedge funds.

Among her other engagements, Susan has advised in regard to a significant number of workouts on behalf of a US\$4 BN real estate advisory group in New York, including complex tax planning related to the restructuring of secured debt, has served as tax advisor for the private syndication of university housing, hotels and office buildings across Canada, Colombia, and Chile, and the restructuring of a U.S. group, parented by a Canadian corporation and, separately, a multinational group, parented by an EU based company.

Susan has written and lectured extensively on matters pertaining to taxation and international private transactions. She is a past author of a bi-monthly Leading Practitioner Commentary for Tax Management International Journal. She has presented papers before the American Bar Association, the Canadian Tax Foundation, the International Bar Association, the International Fiscal Association, the New York University Tax Institute, the American Institute of Certified Public Accountants, the George Washington University/IRS Institute on International Taxation, and the Practising Law Institute.

In addition to private practice, Susan has held full-time faculty positions at Emory University School of Law and Boston University School of Law, where she taught taxation and international law.

## EDUCATION

- Harvard University, J.D. cum laude
- Cornell University, B.S.

## FACULTY POSITIONS

- Emory University School of Law
- Boston University School of Law

## PREVIOUS EXPERIENCE

- Winston & Strawn (Partner)
- Polsinelli (Partner)

## BARS & COURTS

- Admitted in Illinois
- Admitted in New York

## LANGUAGES

- French
- Hebrew

## **PUBLICATIONS**

- Strafford Publications, CLE Webinar, Co-Speaker, "Tax Issues with Foreign Investment Fund Lending," March 18, 2015
- Leading Edge Alliance, Speaker, "Recent Developments in International Tax: The Apple Tax Saga," 2013
- ABA U.S. Latin America Tax Planning Strategies Conference, Moderator, Government Panel, 2012
- AICPA International Business, Accounting, Auditing and Tax Conference, Speaker, "Tax Savings Through the Use of an Offshore Manufacturing and Headquarters Company: A Case Study," 2010
- BNA Tax Management International Journal, Vol. 36, No. 8, 382-384, Author, "De-Risked Distributors: Implications of the U.S. and OECD Model Treaties and Commentaries and the OECD Report on the Attribution of Profits to PEs," 2007
- BNA Tax Management International Journal, Vol. 36, No. 5, 226-228, Author, "New GRA Regulations - A Giant Step Forward," 2007
- BNA Tax Management International Journal, Vol. 36, No. 4, 177-178, Author, "Nonresident Aliens as Eligible S Corporation Shareholders," 2007
- BNA Tax Management International Journal, Vol. 36, No. 2, 92-94, Author, "Substantial Business Activities: Old Wine in a New Vessel?" 2007
- GWU and IRS 20th Annual Institute on Current Issues in International Taxation, Speaker "Current Issues in the Taxation of Investment Funds," 2007
- BNA Tax Management International Journal, Vol. 35, 631, Author, "Purging Election for Section 1297(e) PFICs--More than One Bite at the Apple," 2006
- BNA Tax Management International Journal, Vol. 35, No. 10, 522-523, Author, "Master-Feeder Funds: Domestic or Foreign Master?" 2006
- BNA Tax Management International Journal, Vol. 35, No. 8, 409-411, Author, "Notice 2006-46: Cross-Border Distributions and Reorganizations of U.S. Real Property Interests," 2006
- GWU and IRS 15th Annual Institute on Current Issues in International Taxation, Speaker, "Attribution of Activities and Services: Implications for Trade or Business Sourcing and Allocation of Profits," 2002
- 47th Tax Conference, Canadian Tax Foundation, Speaker, "U.S. Estates, Gift, and Generation-Skipping Transfer Tax Issues for Canadians," 1995

## **PROFESSIONAL MEMBERSHIPS & ACTIVITIES**

- American Bar Foundation, Fellow
- International Fiscal Association, U.S.A. Branch, Council; Former Member of Executive Committee; Former Vice President-Secretary
- International Section of the American Bar Association, Former Member; Taxation Committee, Former Chairman and Vice Chairman; Canadian Law Committee, Former Chairman
- New York State Bar Association, Tax Committee, International Section, Former Vice Chairman

## **ASSOCIATED NEWS, EVENTS & PUBLICATIONS**

- Susan Klein discusses the implications of tax legislative proposals and administrative developments for global M&A activity with International Tax Review (February 28, 2017)
- Susan Klein discusses the key provisions of the newly issued US Model Income Tax Convention with International Tax Review (March 9, 2016)
- Susan Klein discusses tax reform and transactional trends with International Tax Review (February 27, 2015)

## **HONORS AND RECOGNITION**

- The International Who's Who of Corporate Tax Lawyers, Listed, 2012-2014, 2016, 2017
- Recognized in Euromoney's International Tax Review, Listed in "Women in Tax Leaders" 2016 and 2017