



Renan Rodriguez

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OVERVIEW

Rey advises businesses on tax and corporate law matters throughout their entire lifecycle, from initial formation to eventual disposition, and everything in between. Additionally, Rey has focused on representing clients with respect to U.S. federal tax audits, IRS administrative appeals and litigation.

Rey has represented U.S.-based, foreign-based, and multinational enterprises and private equity firms, providing advice in connection with mergers and acquisitions, distribution structures, and internal reorganizations, including complex border transactions; U.S. Subpart F income and GILTI planning analysis; tax treaty analysis; and other matters related to outbound and inbound U.S. tax planning. He has represented U.S. clients investing in or structuring business operations in Latin America, Europe, Canada, and various other jurisdictions outside the U.S., as well as non-U.S. clients investing in the U.S. Additionally, he collaborates with closely held businesses and their owners to create and implement tax strategies that safeguard and maximize corporate value. His experience includes:

- Advising 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,

Industry

Financial Services & Capital Markets

Services

Capital Markets

Corporate

Crypto, Digital Assets, & Blockchain

Federal Tax Planning

International Tax

Investment Management

Mergers & Acquisitions

Private Equity

Special Situations & Opportunistic Investing

Tax

Tax Controversy

HUSCH BLACKWELL

Brookfield Asset Management Ltd., with a market value of more than \$50 billion as of the spin-off date.

- Advising MSP Recovery, LLC in its \$32.6 billion business combination with Lionheart Acquisition Corp. II.
- Advising 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.
- Advising 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.
- Advising Fidelity National Financial, Inc. in an \$800 million senior unsecured revolving facility.
- Advising F&G Annuities & Life, Inc. in a \$550 million unsecured revolving facility and in a \$750 million unsecured revolving facility.
- Advising Goldman Sachs in the sale of its Personal Financial Management unit to wealth management firm Creative Planning.
- Advising BCI, in the sale of its interest, alongside ATL and Audax, of Pilot Freight Services LLC to AP Moller – Maersk A/S.
- Representation of client before IRS with \$8 million in imputed underpayments plus penalties and interest.
- Representation of client before IRS with \$200,000 in tax, penalty, and interest with respect to U.S. federal payroll taxes.
- Representation of client before IRS with respect to the employee retention credit claims arising from the legislation enacted as a result of COVID-19.

Prior to joining Husch Blackwell, Rey was a tax associate at an international law firm.

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 Miami, FL. Contact Renan via email or phone for in-person/virtual meetings. Use the Washington, DC office address for mail/deliveries only.