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## U.S. TAX & LEGAL CONSEQUENCES FOR FOREIGNERS & POTENTIAL RESIDENTS

SERVICIO COMPLETO EN ESPAÑOL.

NOTICE: THE FOLLOWING SLIDES CONSIST OF GENERAL INFORMATION, AND ARE NOT MEANT TO BE USED TO ANALYZE ANY SPECIFIC SITUATION. THESE SLIDES SHOULD NOT BE RELIED UPON TO RESOLVE ANY SPECIFIC LEGAL ISSUE. PLEASE SEEK LEGAL COUNSEL AS WARRANTED.

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## INTRODUCTION

- THE COST OF DOING BUSINESS, INVESTING OR SPENDING SIGNIFICANT TIME IN THE U.S. IS BEING SUBJECT TO SOME LEVEL OF TAXATION AND OTHER LEGAL OBLIGATIONS
- THE TAX LAW IS EXTREMELY COMPLEX AND EVERYONE'S SITUATION IS DIFFERENT
- ADVANCE LEGAL PLANNING CAN AVOID LEGAL EXPOSURE AND REDUCE THE AMOUNT OF TAX THAT MUST BE PAID
- THE FOLLOWING IS A BRIEF OUTLINE OF SOME OF THE ISSUES FOREIGNERS CAN EXPECT TO DISCUSS AS THEY PREPARE THEIR OWN PLAN

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## ABOUT EDUARDO “ED” R. ARISTA, CPA, ESQ.

- ASSISTING FOREIGNERS INVESTING AND DOING BUSINESS IN THE U.S. FOR OVER 15 YEARS;
- ATTORNEY LICENSED IN FLORIDA, WASHINGTON, D.C., AND U.S. TAX COURT; LICENSED CPA
- WORKED FOR A U.S. TAX COURT JUDGE IN WASHINGTON, D.C. AND AS A SENIOR CONSULTANT IN ERNST & YOUNG INTERNATIONAL TAX SERVICES GROUP IN CONJUNCTION WITH TAX PROFESSIONALS THROUGHOUT LATIN AMERICAN AND BEYOND
- FORMER CHAIR OF THE FLORIDA BAR COMMITTEE ON RELATIONS WITH CPAs, AND MEMBER OF THE LLC STATUTE DRAFTING TASK FORCE
- FULLY BILINGUAL AND BICULTURAL SPANISH SPEAKER WITH CLIENTS FROM VIRTUALLY EVERY LATIN AMERICAN COUNTRY AND SPAIN
- ADJUNCT PROFESSOR IN THE GRADUATE TAX PROGRAM AT FLORIDA INTERNATIONAL UNIVERSITY
- PUBLISHED NUMEROUS ARTICLES AND REGULARLY LECTURES AT CONTINUING EDUCATION SEMINARS FOR ATTORNEYS, CPAs, BANKERS AND BUSINESS PEOPLE, BOTH IN ENGLISH AND SPANISH
- MORE THAN 35 RECOMMENDATIONS ON [LINKEDIN](#)

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## AGENDA

- FOREIGNERS WHO ARE NOT TAX RESIDENTS
- CONSEQUENCES OF TAX RESIDENCY
- PLANNING FOR (AND AGAINST) TAX RESIDENCY
- PLANNING METHODOLOGY
- SOME CRITICAL NON-TAX LEGAL ISSUES
- COMMON PITFALLS



## FOREIGNERS WHO ARE NOT TAX RESIDENTS

- ONLY TAXED ON INCOME DEFINED IN THE TAX LAW COMING FROM A “U.S. SOURCE”; NOT ON INCOME THAT IS CONSIDERED “FOREIGN SOURCE”
- HOWEVER, SOME U.S. SOURCE INCOME IS STILL EXEMPT FROM TAX (E.G. CAPITAL GAINS ON THE SALE OF U.S. STOCK, CERTAIN LOANS TO U.S. PERSON, ETC.)
- U.S. SOURCE INCOME IS USUALLY TAXED AT A FLAT 30% RATE WITHOUT TAKING ANY DEDUCTIONS, UNLESS REDUCED BY A TREATY
- THE PERSON PAYING THE FOREIGNER IS NORMALLY REQUIRED TO WITHHOLD THE TAX
- SOMETIMES DEDUCTIONS ARE ALLOWED WHEN THE U.S. SOURCE INCOME RELATES TO CERTAIN BUSINESS ACTIVITIES

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## INCOME TAXATION OF TAX RESIDENTS

- TAXED ON WORLDWIDE INCOME, BOTH U.S. SOURCE *AND* FOREIGN SOURCE
- A TAX RESIDENT'S TAXABLE FOREIGN SOURCE INCOME CAN INCLUDE, FOR EXAMPLE:
  - DIVIDENDS AND INTEREST GENERATED BY NON-U.S. INVESTMENTS
  - GAINS FROM THE SALE OF FOREIGN REAL ESTATE OR BUSINESSES
  - COMMISSIONS OR FEES EARNED FOR THE PERFORMANCE OF PERSONAL SERVICES OUTSIDE THE U.S.
  - GAINS FROM THE EXCHANGE OF FOREIGN CURRENCY, ETC.
- A "FOREIGN TAX CREDIT" CAN USUALLY BE TAKEN FOR THE AMOUNT OF INCOME TAX ON THE SAME INCOME THAT WAS ACTUALLY PAID TO ANOTHER COUNTRY [WWW.ARISTALAW.COM](http://WWW.ARISTALAW.COM)



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## TAX RESIDENTS MUST ALSO REPORT INFORMATION REGARDING:

- FOREIGN BANK ACCOUNTS IN WHICH THEY HAVE A DIRECT OR INDIRECT FINANCIAL INTEREST OR SIGNATURE AUTHORITY;
- DIRECT AND INDIRECT OWNERSHIP IN AND ECONOMIC ACTIVITY OF, CERTAIN FOREIGN COMPANIES;
- TRANSFERS TO AND FROM CERTAIN FOREIGN TRUSTS;
- RECEIPT OF GIFTS AND INHERITANCES FROM FOREIGNERS; AND
- VIRTUALLY ANYTHING ELSE THAT A U.S. CITIZEN MUST REPORT.

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## PLANNING OBJECTIVES FOR FOREIGNERS WHO MAY BECOME TAX RESIDENTS (MANAGE FOREIGN SOURCE INCOME)

*DEPENDING ON THE FOREIGNER AND THEIR CIRCUMSTANCES, VARIOUS TACTICS CAN BE EMPLOYED TO:*

- EXCLUDE FOREIGN SOURCE INCOME FROM U.S. TAXATION
- ACCELERATE RECOGNITION OF FOREIGN SOURCE INCOME TO OCCUR PRIOR TO ESTABLISHMENT OF TAX RESIDENCY
- DELAY RECOGNITION OF FOREIGN SOURCE DEDUCTIONS OR LOSSES UNTIL AFTER ESTABLISHING TAX RESIDENCY
- **MOST IMPORTANTLY, AVOID OR AT LEAST DELAY AS MUCH AS POSSIBLE THE ESTABLISHMENT OF TAX RESIDENCY (I.E. THE TAXABILITY OF FOREIGN SOURCE INCOME)**

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## THE INBOUND JOURNEY

- PASSIVE INVESTMENT/VACATION
- OPENING BUSINESS/ RELOCATING FAMILY
- SECURING LONG-TERM VISA/ PERMANENT STATUS
- DISCONTINUING SOCIAL AND ECONOMIC TIES TO HOME COUNTRY
- PREPARING FOR LONG-TERM U.S. RESIDENCY
- THE DECISIONS YOU MAKE REGARDING WHEN AND HOW YOU TAKE THESE STEPS WILL HAVE TAX AND LEGAL CONSEQUENCES

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## AT WHAT POINT ALONG THE INBOUND JOURNEY DO YOU BECOME A TAX RESIDENT ?

- IT COULD HAPPEN BEFORE OR AFTER OBTAINING PERMANENT RESIDENCE.
- IT COULD HAPPEN AT DIFFERENT TIMES FOR PURPOSES OF INCOME TAX THAN FOR PURPOSES OF ESTATE AND GIFT TAXES.
- THIS PRESENTATION FOCUSES ON INCOME TAXES.



## WHO IS A TAX RESIDENT?

- U.S. CITIZENS AND PERMANENT RESIDENTS (I.E. “GREEN CARD” HOLDERS), EVEN IF THEY HAVE ANOTHER NATIONALITY OR HAVE NEVER BEEN TO U.S., UNLESS QUALIFIED TO ELECT NON RESIDENCY PURSUANT TO A TAX TREATY
- PERSONS WITH A “SUBSTANTIAL PRESENCE” IN THE U.S., UNLESS QUALIFIED TO ELECT NON RESIDENCY PURSUANT TO THE “CLOSER CONNECTION” EXCEPTION OR PURSUANT TO A TAX TREATY
- NOTE: TAX RESIDENCY DOES NOT DEPEND ON IMMIGRATION STATUS, ALTHOUGH THAT IS RELEVANT



## WHAT IS SUBSTANTIAL PRESENCE?

- THE SUBSTANTIAL PRESENCE TEST IS ONE MEASURE OF TAX RESIDENCY FOR INCOME TAX PURPOSES (NOT USED FOR ESTATE & GIFT TAX PURPOSES)
- BASIC FORMULA COUNTS ALL DAYS PRESENT IN THE U.S. IN THE CURRENT YEAR, ONE-THIRD OF THE DAYS PRESENT DURING THE PRIOR YEAR AND ONE-SIXTH OF THE DAYS PRESENT THE YEAR BEFORE THAT
- SOME DAYS ARE EXCLUDED FROM THE CALCULATION, FOR EXAMPLE
  - DAYS PRESENT IN THE U.S. HOLDING SOME VISAS
  - DAYS PRESENT IN THE U.S. WHILE UNABLE TO LEAVE DUE TO A MEDICAL CONDITION
  - OTHER EXCEPTIONS
- A FOREIGNER HAS A SUBSTANTIAL PRESENCE IN THE U.S. IF THE THREE YEAR FORMULA YIELDS 183 DAYS OR MORE WITHOUT COUNTING THE DAYS SUBJECT TO ANY OF THE EXCEPTIONS.

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## CLOSER CONNECTION EXCEPTION TO SUBSTANTIAL PRESENCE

- ALLOWS A FOREIGNER TO AVOID BEING TREATED AS A TAX RESIDENT, EVEN IF THEY MEET THE SUBSTANTIAL PRESENCE TEST
- MUST BE PRESENT LESS THAN 183 DAYS IN ANY ONE YEAR, AFTER SUBTRACTING DAYS PRESENT SUBJECT TO ANY EXCEPTION
- MUST FILE A STATEMENT WITH THE IRS TO CLAIM THIS EXCEPTION
- THE FOREIGNER'S PERSONAL CIRCUMSTANCES MUST MEET THE LEGAL CRITERIA TO PROVE A "CLOSER CONNECTION" TO ANOTHER COUNTRY



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## TREATY EXCEPTION TO SUBSTANTIAL PRESENCE OR PERMANENT RESIDENCE

- ALLOWS A FOREIGNER TO AVOID BEING TREATED AS A TAX RESIDENT
- CAN BE PRESENT IN THE U.S. ANY NUMBER OF DAYS
- FOREIGNER MUST HAVE A “TAX HOME” IN A COUNTRY THAT HAS A TREATY WITH THE U.S.
- ONLY WESTERN HEMISPHERE TREATY COUNTRIES ARE CANADA, MEXICO, & VENEZUELA
- THE FOREIGNER’S PERSONAL CIRCUMSTANCES MUST MEET THE LEGAL CRITERIA SET FORTH IN THE TREATY
- MUST FILE A U.S. TAX RETURN AND REPORT ALL WORLDWIDE INCOME, BUT NOT REQUIRED TO PAY TAX ON FOREIGN SOURCE INCOME

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## PLANNING METHODOLOGY REGARDING ESTABLISHMENT OF TAX RESIDENCY

- FIRST, DETERMINE IF TAX RESIDENCY HAS ALREADY BEEN ESTABLISHED UNDER GENERAL FORMULA
  - REVIEW THE PERSONAL CIRCUMSTANCES TO DETERMINE WHETHER ANY DAYS PRESENT IN THE U.S. CAN BE EXCLUDED FROM THE COMPUTATION UNDER ONE OF THE VARIOUS EXCEPTIONS
  - IF NECESSARY, REVIEW WHETHER THE FACTS AND CIRCUMSTANCES SUPPORT AN ELECTION UNDER THE CLOSER CONNECTION EXCEPTION OR A TAX TREATY, IF AVAILABLE
- IF TAX RESIDENCY HAS BEEN IRREVOCABLY ESTABLISHED, WHAT TAX RETURNS AND REPORTS ARE REQUIRED AND HAVE THEY BEEN FILED?
- IF THERE IS NON-COMPLIANCE DETERMINE HOW TO COMPLY WITH MINIMAL TAXES, CIVIL PENALTIES, AND CRIMINAL EXPOSURE

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## PLANNING OBJECTIVES PRIOR TO ESTABLISHMENT OF TAX RESIDENCY

*GOING FORWARD: UNDERSTANDING THE COMPOSITION OF YOUR WORLDWIDE ASSET PORTFOLIO, AS WELL AS YOUR PERSONAL GOALS, LIMITATIONS AND PLANS WITH RESPECT TO YOURSELF, YOUR FAMILY, YOUR BUSINESS AND YOUR ASSETS IN THE SHORT AND MEDIUM TERM, WE CAN HELP YOU:*

- DETERMINE HOW MANY DAYS YOU MAY BE PRESENT DURING THE REMAINDER OF THE YEAR AND IN SUBSEQUENT YEARS WITHOUT MEETING THE SUBSTANTIAL PRESENCE TEST
- IDENTIFY AND HELP YOU IMPLEMENT VARIOUS TACTICS TO RESTRUCTURE YOUR WORLDWIDE ASSETS IN ORDER TO MINIMIZE THE U.S. TAX IMPACT UPON BECOMING A U.S. TAX RESIDENT
- DEVELOP A LEGAL PLAN TO DEFER THE ESTABLISHMENT OF TAX RESIDENCY PERPETUALLY, IF POSSIBLE, OR AT LEAST LONG ENOUGH TO EXECUTE YOUR PLAN PRIOR TO BEING TREATED AS A U.S. CITIZEN FOR TAX PURPOSES

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NOTE: A COMPLETELY DIFFERENT SET OF RULES DETERMINES WHEN A FOREIGNER BECOMES A TAX RESIDENT FOR PURPOSES OF THE ESTATE & GIFT TAX. THE CONSEQUENCES ARE THAT TRANSFERS OF THEIR WORLDWIDE ASSETS BECOME TAXABLE BOTH DURING LIFE AND UPON DEATH.

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## CRITICAL RELATED NON-TAX, LEGAL ISSUES

*A GOOD TAX LAWYER WILL UNDERSTAND THAT TAX PLANNING DOES NOT OCCUR IN A VACUUM AND BE CAPABLE OF MULTIDIMENSIONAL LEGAL ANALYSES, INCLUDING:*

- PLANNING FOR THE POSSIBILITY OF DEATH AND INCAPACITY WHILE RESIDING IN THE U.S.
- MINIMIZING PERSONAL LIABILITY FOR U.S. BUSINESS OR INVESTMENT ACTIVITY
- PROTECTING U.S. ASSETS FROM UNFORESEEN PERSONAL LEGAL JUDGMENTS
- STRUCTURING U.S. BUSINESS ENTITIES AND LEGAL AGREEMENTS WITH THIRD PARTIES TO PROVIDE MAXIMUM LEGAL ADVANTAGE
- WORKING EFFECTIVELY WITH YOUR U.S. ACCOUNTANT AND INVESTMENT ADVISOR

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## JUST A FEW COMMON PITFALLS (PART 1)

WE ARE OFTEN CALLED IN TO REPAIR DAMAGE CAUSED BY CLIENTS:

- FOLLOWING LEGAL ADVICE FROM NON-ATTORNEYS (E.G. “NOTARIES”, ACCOUNTANTS, REALTORS, ETC.)
- FOLLOWING LEGAL ADVICE FROM ATTORNEYS NOT LICENSED IN FLORIDA
- FOLLOWING TAX ADVICE FROM A CPA OR TAX ATTORNEY WHO IS NOT EXPERIENCED IN INTERNATIONAL TAX LAW.

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## JUST A FEW COMMON PITFALLS (PART 2)

### WAITING TO SEE A TAX ATTORNEY UNTIL AFTER:

- TAX RESIDENCY HAS ALREADY BEEN IRREVOCABLY ESTABLISHED
- TAXABLE TRANSFERS HAVE BEEN MADE TO OTHER TAX RESIDENTS
- CONTRACTS TO PURCHASE BUSINESSES/REAL ESTATE HAVE ALREADY BEEN SIGNED
- UNEXPECTED DEATH OR ILLNESS OCCURS WHILE LIVING TEMPORARILY IN THE U.S.

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## JUST A FEW COMMON PITFALLS (PART 3)

- NOT ENSURING THE IMMIGRATION ATTORNEY IS COORDINATING WITH THE TAX/BUSINESS ATTORNEY
- SELF-PLANNING BASED UPON INCORRECT OR ONLY PARTIAL APPLICATION OF THE FORMULA TO DETERMINE SUBSTANTIAL PRESENCE
- INCURRING SUBSTANTIAL PENALTIES FOR FAILURE TO FILE THE PROPER TAX RETURNS ON TIME
- CLOSING ON THE PURCHASE OF U.S. REAL ESTATE IN INDIVIDUAL NAME, AS OPPOSED TO A CAREFULLY DESIGNED AND IMPLEMENTED STRUCTURING UTILIZING THE PROPER ENTITY OR ENTITIES

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## JUST A FEW COMMON PITFALLS (PART 4)

- DEALING WITH A “PROFESSIONAL” WHO RACES TO LEGAL CONCLUSIONS WITHOUT CAREFULLY EVALUATING YOUR PERSONAL CIRCUMSTANCES
- WORKING WITH SOMEONE WHO SEEMS TO SPEAK YOUR LANGUAGE BUT DOESN'T REALLY UNDERSTAND YOU; OR SOMEONE WHO YOU DON'T UNDERSTAND
- NOT UPDATING YOUR ESTATE PLANNING AFTER MOVING TO THE U.S., EVEN TEMPORARILY.
- SIGNING POORLY DRAFTED OR UNFAIR BUSINESS CONTRACTS WITH THE ASSISTANCE OF NON-ATTORNEYS OR FOREIGN ATTORNEYS

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## WORKING WITH US

YOU WILL NEVER BE CHARGED FOR A BRIEF MEETING TO HELP YOU DECIDE WHETHER WE ARE THE RIGHT LAW FIRM FOR YOU. DURING THAT MEETING, WE CAN ALSO EXPLAIN HOW OUR SERVICES ARE TYPICALLY BROKEN DOWN INTO *EVALUATION* AND *IMPLEMENTATION* PHASES. WE CAN THEN QUOTE YOU A FLAT FEE OR ESTIMATE THE HOURS REQUIRED TO COMPLETE THE *EVALUATION*.

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## THE EVALUATION NORMALLY CONSISTS OF:

1. AN INITIAL MEETING TO EXPLAIN IN GENERAL THE TAX LAWS THAT APPLY TO FOREIGNERS, GATHER INFORMATION REGARDING YOUR WORLDWIDE ASSETS, PERSONAL CIRCUMSTANCES, GOAL AND LIMITATIONS, AND SOMETIMES GIVE PRELIMINARY ADVICE PENDING FURTHER ANALYSIS.
2. REVIEWING DOCUMENTATION REGARDING YOUR BUSINESSES, INVESTMENTS, AND OTHER ASSETS, COLLABORATING AS APPROPRIATE WITH YOUR PRIVATE BANKER, HOME ATTORNEY AND/OR ACCOUNTANT, AND SOMETIMES FOLLOWING UP WITH REQUESTS FOR SPECIFIC ADDITIONAL INFORMATION OR FOCUSED FOLLOW UP QUESTIONS.
3. ANALYZING ALL THE INFORMATION GATHERED AND DEVELOPING A SERIES OF IMPLEMENTABLE RECOMMENDATIONS TO MINIMIZE U.S. TAX AND LEGAL EXPOSURE FOR YOU AND YOUR FAMILY.
4. COMMUNICATING THESE RECOMMENDATIONS TO YOU AND QUOTING OUR FEES FOR ASSISTING IN IMPLEMENTING EACH OF THEM (*IMPLEMENTATION*).



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## CONSULTATIONS

AGAIN, THERE IS NEVER A CHARGE FOR A BRIEF MEETING TO DETERMINE WHETHER WE ARE THE RIGHT FIRM FOR YOU AND TO ESTIMATE THE FEE FOR AN EVALUATION.

HOWEVER, MOST PEOPLE WHO MAKE AN APPOINTMENT WANT TO DISCUSS THEIR PERSONAL SITUATION, LEARN MORE ABOUT THE COMPLEX RULES COVERED IN THIS PRESENTATION, AND BE ADVISED AS TO WHAT THEY CAN AND SHOULD DO, BUT THEY ARE NOT YET READY TO FORMALLY RETAIN THE FIRM TO CONDUCT A THOROUGH EVALUATION.

IN THIS CASE, WE RESERVE TWO HOURS OF TIME TO CONDUCT AN INFORMAL EVALUATION FOR A NOMINAL FLAT FEE, WHICH IS NORMALLY CREDITED TOWARDS THE FEE FOR IMPLEMENTING ANY RECOMMENDATION YOU HIRE US TO COMPLETE.

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## THE IMPLEMENTATION PHASE NORMALLY CONSISTS OF:

- EXECUTING FUNDAMENTAL ESTATE PLANNING DOCUMENTS TO PREPARE FOR DEATH OR INCAPACITY
- SOPHISTICATED TRUSTS, FAMILY LIMITED PARTNERSHIPS AND OFFSHORE PLANNING
- CONVERSION, FORMATION OR RECAPITALIZATION OF BUSINESS ENTITIES
- EXECUTING PARTNERSHIP, SHAREHOLDER OR OPERATING AGREEMENTS
- CHANGING TITLE TO STOCK AND REAL ESTATE
- REALLOCATING LIQUID INVESTMENTS
- REFINANCING / LEVERAGING ASSETS
- PURCHASING LIFE INSURANCE AND/OR ANNUITIES

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WE LOOK FORWARD TO AN OPPORTUNITY TO BE OF ASSISTANCE.



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