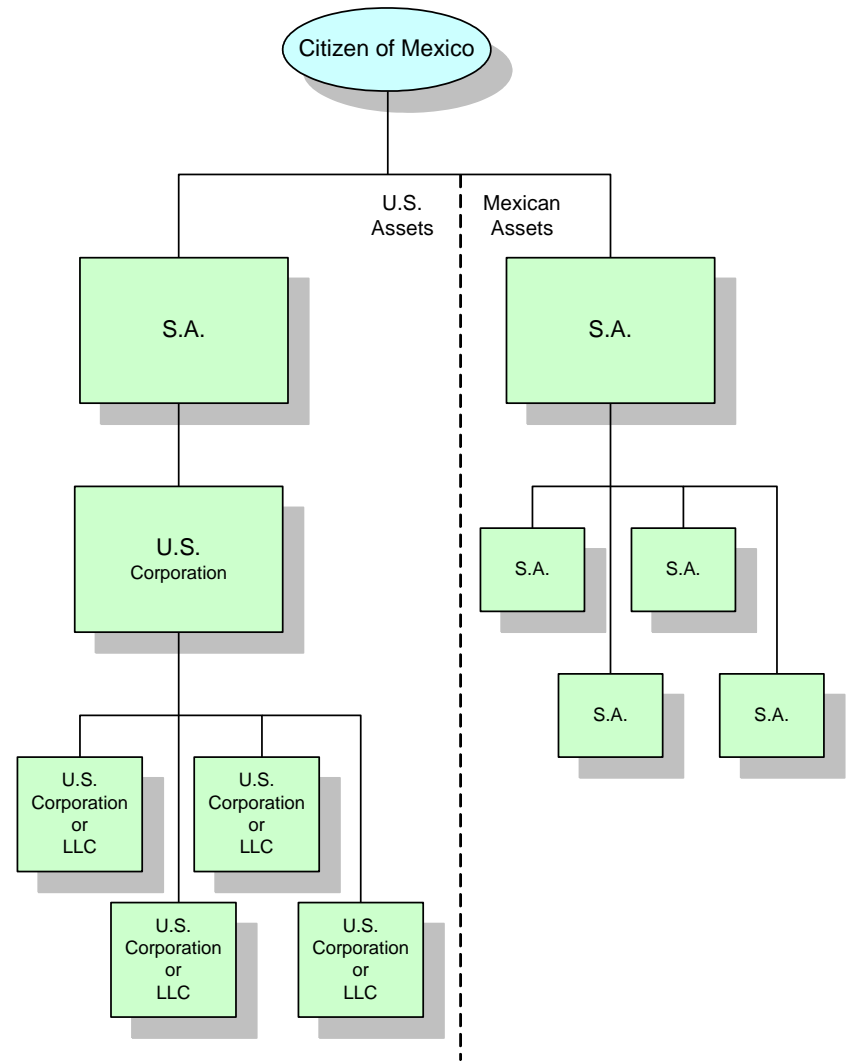
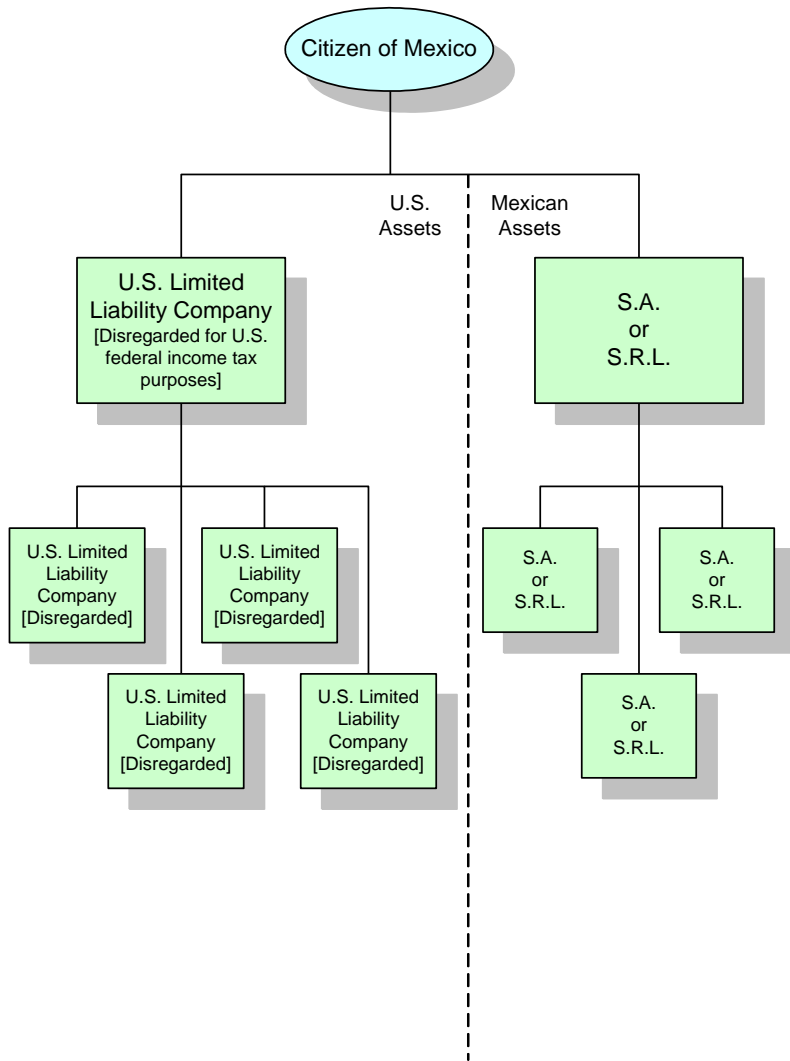


Alternativas Fiscales para Inversiones en EUA

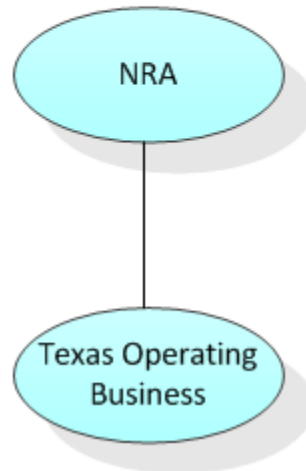
**Instituto de Contadores Publicos
de Nuevo Leon
17 Agosto 2017**

**William H. Hornberger
Jackson Walker L.L.P.
2323 Ross Ave., Ste. 600
Dallas, Texas 75201
214-953-5857**

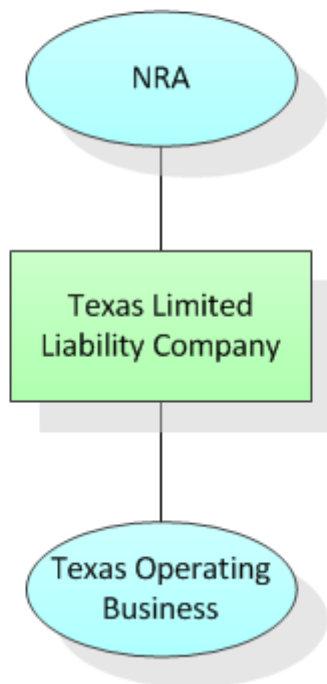
Illustration of Structuring Issues for Citizens of Mexico



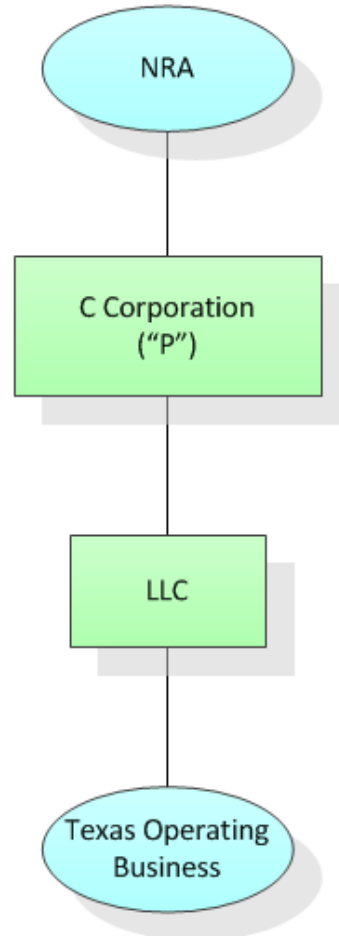
Sole Proprietorship for Federal Income Tax



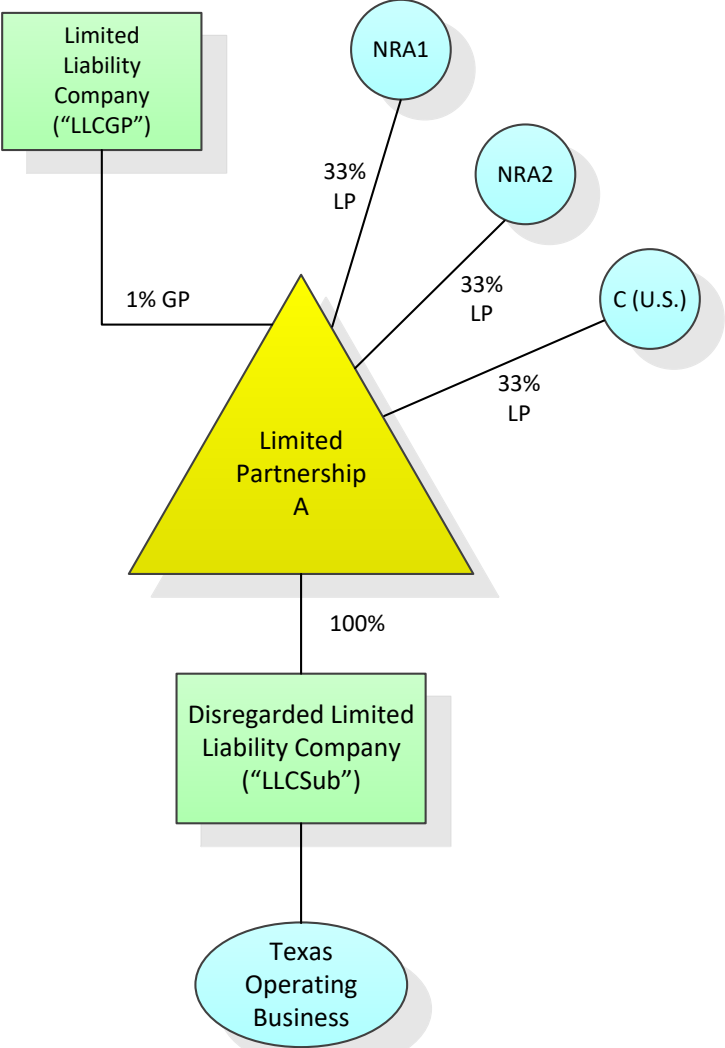
SINGLE-MEMBER (INDIVIDUAL)
LIMITED LIABILITY COMPANY OWNING
OPERATING BUSINESS – DISREGARDED FOR
U.S. FEDERAL INCOME TAX PURPOSES



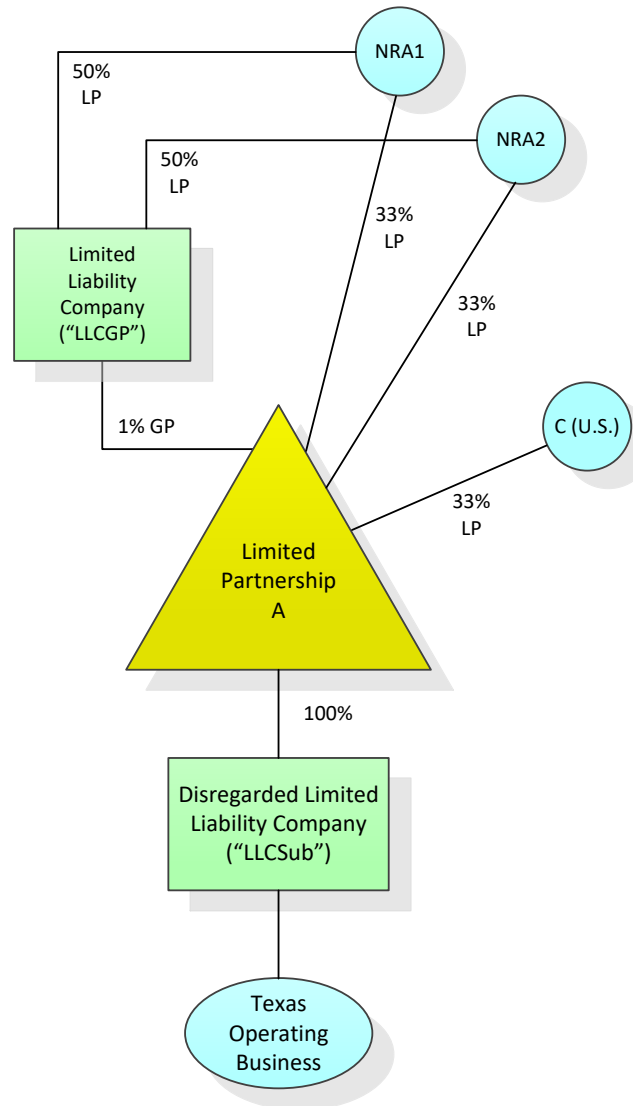
SINGLE-MEMBER (C CORPORATION)
LIMITED LIABILITY COMPANY OWNING
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U.S. FEDERAL INCOME TAX PURPOSES



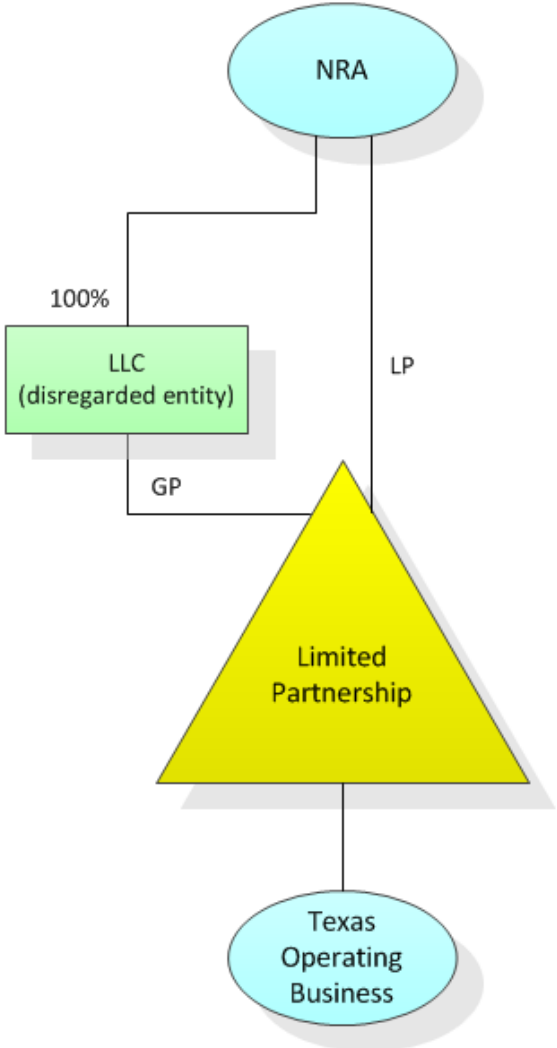
SINGLE-MEMBER (LIMITED PARTNERSHIP) LIMITED LIABILITY COMPANY OWNING OPERATING BUSINESS – DISREGARDED FOR FEDERAL INCOME TAX PURPOSES



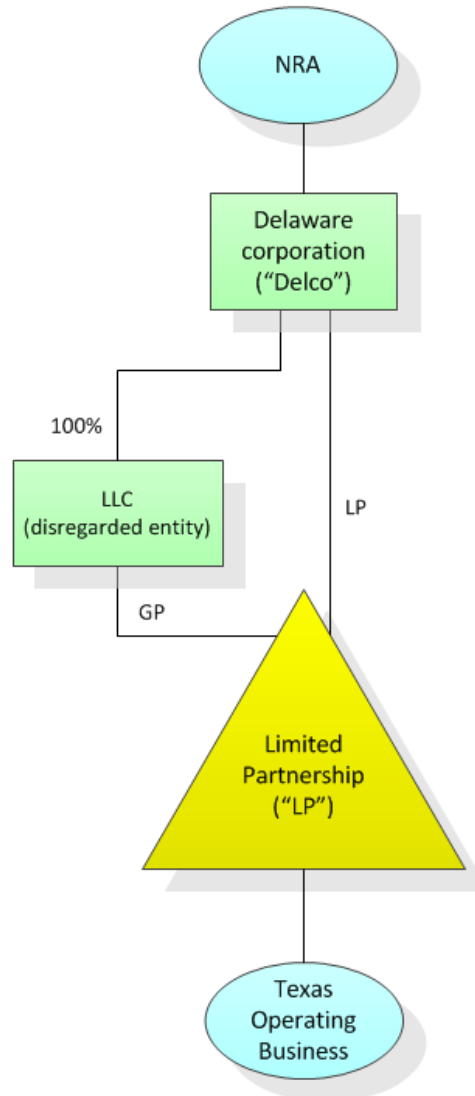
SINGLE-MEMBER (LIMITED PARTNERSHIP) LIMITED LIABILITY COMPANY OWNING OPERATING BUSINESS – DISREGARDED FOR FEDERAL INCOME TAX PURPOSES



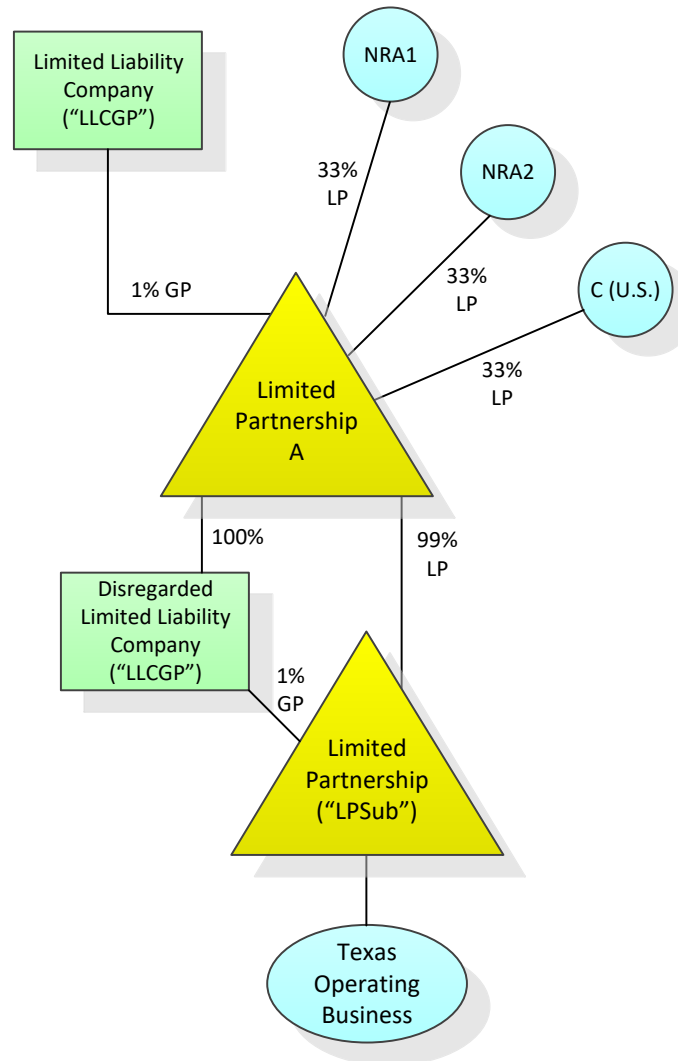
SINGLE PERSON (INDIVIDUAL) LIMITED PARTNERSHIP
OWNING OPERATING BUSINESS – DISREGARDED FOR U.S.
FEDERAL INCOME TAX PURPOSES



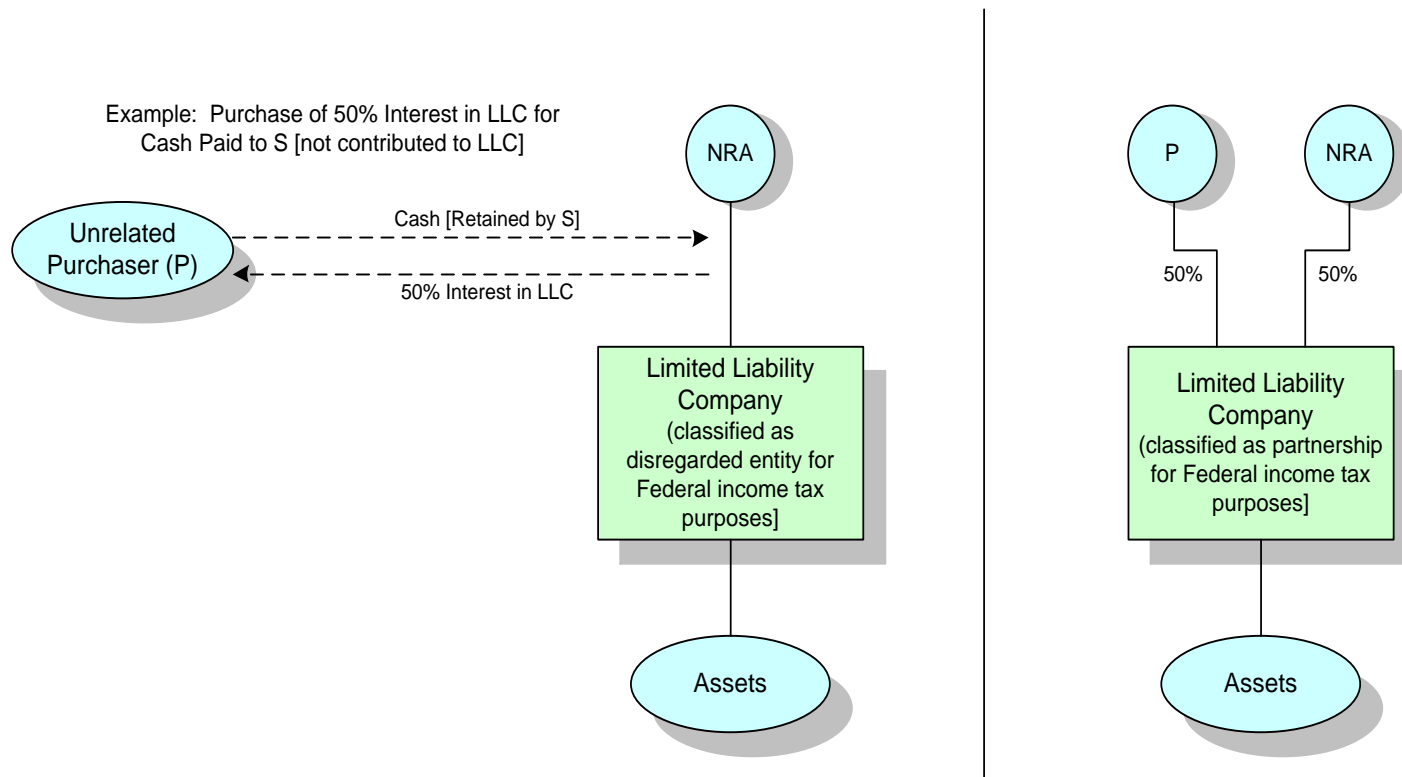
SINGLE PERSON (CORPORATION) LIMITED PARTNERSHIP
OWNING OPERATING BUSINESS – DISREGARDED FOR U.S.
FEDERAL INCOME TAX PURPOSES



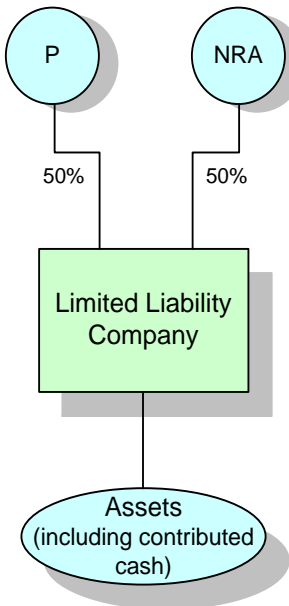
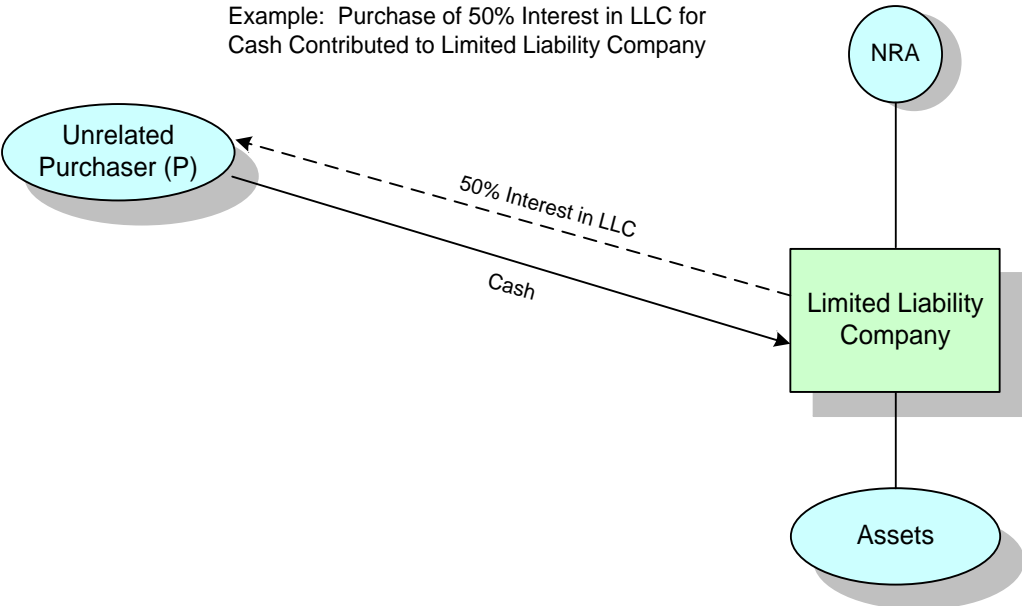
SINGLE-PERSON (LIMITED PARTNERSHIP) LIMITED PARTNERSHIP OWNING OPERATING BUSINESS – DISREGARDED FOR U.S. FEDERAL INCOME TAX PURPOSES



Forms of Taxable Acquisitions: Acquisition of Interest in Single-Member Limited Liability Company for Cash; Cash is Retained by Seller and is not contributed to the LLC



Compare: Acquisition of Interest in Single-Member Limited Liability Company for Cash Contributed to Company



Forms of Taxable Acquisitions: 50% Co-Owner's Acquisition of Other Co-Owner's Interest in Limited Liability Company

