

David S. Barnhill

Shareholder

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Practice & Industry Areas

- Tax Law
- International
- Private Wealth Services
- Entity Formation & Organization
- International Planning & Transactions

Education

- New York University School of Law, LL.M. Taxation, 2011
- Indiana University Maurer School of Law, J.D., *cum laude*, 2010
- Brigham Young University, B.A., 2006

Bar & Court Admissions

- Florida, 2013
- Utah, 2010
- U.S. Tax Court
- Eleventh Circuit Court of Appeals

Overview

David Barnhill represents corporate clients in inbound and outbound restructuring and other international tax planning initiatives, as well as represents high net worth individuals in inbound and outbound international tax matters, including pre-residency planning and expatriation. He has advised numerous clients regarding U.S. international income tax and reporting compliance matters, including participation in the IRS Offshore Voluntary Disclosure Program, streamlined filing compliance procedures and other compliance alternatives.

David represents such clients in all stages of tax controversy proceedings, including IRS examinations, IRS Appeals, United States Tax Court proceedings and Federal appellate litigation. He represented several Swiss banks in connection with participation in the U.S. Department of Justice Program for Non-Prosecution Agreements or Non-Target Letters for

Swiss Banks, including negotiations with the U.S. Department of Justice, where he relocated to Switzerland in 2015 to supervise the evaluation of bank conduct.

Honors

- Florida *Super Lawyers*, “Rising Star,” 2021-22
- *The Best Lawyers in America*®, Tax Law, 2022-24

Professional Associations & Memberships

- The Society of Trust and Estate Practitioners (STEP)