



Renan Rodriguez

SENIOR ASSOCIATE

THE LINK VIRTUAL OFFICE

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OVERVIEW

Rey is a U.S. tax lawyer who advises clients on inbound and outbound structuring strategies that minimize U.S. tax burdens in business transactions, estate planning, and investments. He practices from Naples as a member of our virtual office, The Link.

Rey Rodriguez integrates his extensive tax knowledge and experience into the fabric of a transaction—identifying opportunities to optimize deal and trust planning structures for maximum profitability while reducing tax exposure for businesses and estates.

He serves an elite clientele including family organizations and ultra-high-net-worth individuals throughout the United States and Latin America, acting as a trusted advisor and counselor across all stages of their growth and legacy. When tax controversies demand resolution, Rey represents his clients before the IRS and the Florida Department of Revenue.

On the business and corporate side, Rey provides counsel to entrepreneurs, executives, managers, and directors regarding sophisticated and complex business transactions, including acquisitions, dispositions, and restructurings. His clients rely on him not merely as legal counsel, but as a strategic partner whose insight drives measurable value at the negotiating table and beyond.

On the private wealth side, Rey is a trusted legal advisor to U.S. and international family offices with ties to the United States, counseling them on their charitable

Industry

Financial Services & Capital Markets

Services

Alternative Investments

Capital Markets

Corporate

Crypto, Digital Assets, & Blockchain

Federal Tax Planning

International Tax

Mergers & Acquisitions

Private Equity

Special Situations & Opportunistic Investing

Tax

Tax Controversy

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endeavors and business interests and serving them with depth and dedication. He help clients establish family offices and philanthropic vehicles—structures that are thoughtfully designed to preserve and grow generational wealth while advancing meaningful charitable legacies in a tax-efficient manner.

A native Spanish speaker, Rey maintains strong personal and professional ties to Latin America. He travels to the region regularly—both for business and with family—bringing a nuanced cultural and legal perspective that is invaluable to his international clientele.

Experience

- Represented First Citizens Bancshares, Inc. in its all-stock merger with Park National Corporation.

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



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