



## H. Carter Hood

*Partner*

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### **PRACTICE AREAS**

Business Tax

Estate Planning

Wealth Planning

Family-Owned Businesses

Exempt Organizations and  
Charitable Giving

General Tax

Tax Controversies

### **EDUCATION**

Harvard University Law School,  
1998, J.D., *cum laude*

George Washington University,  
School of Business and Public  
Management, 1995  
Master of Taxation, *summa cum  
laude*

Harvard College, 1991, A.B.,  
Economics, *magna cum laude*

### **BAR AND COURT**

#### **ADMISSIONS**

District of Columbia

Virginia

Carter provides tax advice and other guidance to domestic and foreign individuals and their closely held businesses. In addition to preparing wills and a wide variety of trusts, Carter has established family limited partnerships and limited liability companies and implemented the sale of family businesses to grantor and non-grantor trusts. He has administered estates, established private foundations, advised clients on pre- and post-nuptial agreements, provided post-mortem tax planning advice and represented taxpayers before the Internal Revenue Service in audits and appeals.

### **REPRESENTATIVE MATTERS**

- Designed and implemented pre-IPO estate planning that used GST-tax exempt trusts, GRATs and other grantor trusts funded with carried interests in LLCs as well as traditional LLC interests. Worked extensively with real estate attorneys, securities attorneys, lenders, investment bankers and accountants to design an estate plan that would not interfere with the proposed IPO.
- Prior to sale of French company owned through U.S. limited partnerships and LLCs, established GRATs to benefit children and a CLUT with the family foundation receiving the lead interest and a GST-exempt trust receiving the remainder. Worked with French attorneys and IRS to obtain reduced tax withholding rates for GRATs under U.S.-French Income Tax Convention.

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- Helped U.S. beneficiary reduce income taxes after becoming successor beneficiary of foreign non-grantor trusts with decades of undistributed net income, as well as investments in foreign corporations that constituted PFICs, CFCs and/or FPHCs for U.S. income tax purposes.

#### **ACADEMIC APPOINTMENTS**

Adjunct Professor, Graduate Tax Program, Georgetown University Law Center, 2004 - Present (Teaching "Income Taxation of Trusts and Estates")

#### **MEMBERSHIPS & AFFILIATIONS**

BNA Tax Management Advisory Board

American Bar Association, Section of Taxation

American Bar Association, Section of Real Property, Trust and Estate Law

Virginia Bar Association

#### **SPEECHES & PRESENTATIONS**

- ABA Section of Taxation, *Selected Topics in Income Tax Planning for Trusts*, Washington DC - May 2009
- Florida Bankers Assn. - Trust, Asset Management & Private Banking Division - 2007 Wealth Management Conference, *Trust Advisors and The Trustees They Direct: Background, Recent Cases & Practical Considerations*, Orlando, FL - August 2007
- ABA Section of Real Property, Probate & Trust Law - 18th Annual Real Property and Estate Planning Symposia, *Special Purpose Advisors and The Trustees They Direct: Background, Recent Cases & Practical Considerations*, Washington, DC - April 2007
- ABA Section of Real Property Probate & Trust Law - Washington, DC Community Outreach Program, *Income Taxation of Estates, Trusts, Grantors and Beneficiaries; Life Insurance Planning*, Washington, DC - March 2006