



**Kevin Leiske** primarily practices in the areas of taxation, corporations, partnerships, and limited liability companies. He has advised a wide range of clients in all stages of their operations, such as; closely held companies and partnerships, including start-ups and family businesses; multinational corporations; and both real estate and securities investment funds.

Kevin is experienced in corporate and partnership taxation issues stemming from a multitude of transactions, along with generally advising on the formation, capitalization, day-to-day operation, liquidation, and sale of such entities.

Prior to joining the firm Kevin most recently worked in the London office of a large accounting firm, focusing on US international and domestic tax advisory work. Before that he worked for a law firm in Silicon Valley and a financial services firm in New York City.

### **Representative Experience**

#### *Entity Formations and Organizational Restructurings*

Real Estate Investment and Development – Routinely form real estate investment vehicles ranging from closely-held entities to larger private placements for investment in and development of real estate projects.

Global Partnership Consortium Restructuring – Advised on the restructuring of a global public relations firm, taking the business from a closely held partnership to global enterprise.

International Film Distribution Joint-Venture – Represented European movie studio in €40 million joint-venture to distribute a slate of films produced by the studio, including an Oscar nominated film, within the United States.

Mobile vCard:





### *Mergers and Acquisitions*

Start-Up Acquisition – Advised start-up medical software company in its acquisition by a global information and management company.

Cross-Border Partnership De-Merger – Structured the "de-merger" of a £3 billion joint venture, UK limited partnership between two publicly traded, multinational consumer products retailers

Private Equity Acquisition – Advised a private equity fund on its acquisition of construction companies located in Germany, Norway, the Netherlands, and Singapore for an aggregate purchase price of \$500 million

### *Tax Controversy*

#### Private Letter Rulings

Represented taxpayer in requesting retroactive Qualified Electing Fund election. Drafted Section 355 spin-out private letter ruling request for non-US publicly traded company.

FBAR Penalty Abatement – Successfully assisted taxpayer in penalty abatement request and voluntary disclosure of previously undisclosed non-US bank accounts.

IRS Challenge of Intercompany Debt – Represented a multinational manufacturing company in contesting an IRS adjustment resulting in an increase to its taxable income of \$180 million.

### **Professional/Community Involvement**

Board Member of Therapy Works

(<http://www.austintherapyworks.org/>)



**Armbrust & Brown**  
PLLC

**KEVIN LEISKE**

Practices include: **Business Law, Taxation Law, Real Estate Development**

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**Bar**

Texas – 2014

California – 2009

**Education**

Johns Hopkins University – 2003 - B.S. in Engineering

University of Wisconsin – 2006 - J.D.

New York University – 2007 - L.L.M. Taxation

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