



Scott M. Snyder

Partner

ssnyder@foxrothschild.com



Miami, FL

Tel: 786.501.7387

Fax: 305.442.6541

Co-Chair of the firm's International Taxation & Wealth Planning Practice, Scott focuses his practice on international tax planning and wealth management for high-net-worth individuals.

He handles a full range of international taxation and wealth issues, including:

- A wide variety of international tax planning matters primarily related to the representation of high-net-worth and ultra-high-net-worth international private clients.
- Draft sophisticated foreign and domestic trust agreements and advise clients regarding all aspects of international wealth-succession and pre-immigration tax planning (including matters related to the U.S. taxation of foreign trusts, foreign foundations, U.S. estate and gift tax rules as applicable to non-citizen, non-resident alien domiciliaries, and the U.S. taxation of U.S. beneficiaries of foreign trusts).
- Structure private equity funds and hedge funds with foreign investors and foreign sponsors to create tax efficient investment structures.
- Draft sophisticated operating and limited partnership agreements for real estate funds that include provisions involving waterfall distributions with various hurdle rates in accordance with regulatory allocations.
- Prepare and file Delinquent Information Return Procedures, Delinquent FBAR Procedures, Foreign Streamline Procedures and Domestic Streamline Procedures for U.S. tax residents to become compliant with their failure to file international information returns.
- Advise clients regarding inbound tax planning including planning for the use of U.S. tax treaties, establishing portfolio interest investment structures, and creating tax-efficient U.S. real property investment structures considering FIRPTA and estate tax laws, tax-free reorganizations with U.S. corporations.
- Advise clients regarding outbound tax planning including planning for the use of U.S. tax treaties, Subpart F planning, transition tax, FDII, GILTI, foreign tax credits, participation exemption, and PFICs.
- FIRPTA planning including tax-free corporate reorganizations in the context of § 897 and post-mortem planning related to corporate ownership of U.S. real property.
- Pre-immigration tax planning including drafting drop off trusts and reorganizing U.S. and non-U.S. investments.
- Expatriation tax planning including analysis regarding whether someone qualifies as a covered expatriate and reducing the application of the exit tax.
- International estate planning involving the use of foreign corporations to block U.S. estate tax, foreign grantor trust planning, post-mortem trust administration, and PFIC planning in the administration context.

Services

- Taxation & Wealth Planning
- International Taxation & Wealth Planning
- Emerging Companies & Venture Capital
- Family Offices
- International
- Private Equity

Before Fox Rothschild

Prior to joining Fox Rothschild, Scott was an associate at a Miami-based tax and estate planning law firm. Before that, he provided tax consulting and compliance advice for hedge funds and private equity funds at a CPA firm and worked at a Miami law firm providing estate tax planning and international inbound tax structuring for high net worth clients.

Beyond Fox Rothschild

Scott teaches International Inbound Tax in the University of Miami School of Law Tax LL.M. program.

Bar Admissions

- Florida

Education

- University of Miami School of Law (LL.M. in Taxation, 2012)
- University of Miami School of Law (J.D., *cum laude*, 2012)
- University of Central Florida (B.S., *with honors*, 2009)

Honors & Awards

- Named to the *Daily Business Review's* list of lawyers "On the Rise" (2024)
- Selected to the "Super Lawyers - Rising Stars" list for Tax Law in Florida (2017-2025)

Publications

March 4, 2024

More Than a Decade in the Making, the Chile-U.S. Tax Treaty Takes Flight

Tax Notes

November 10, 2023

Foreign Grantor Trust Planning: A Flexible Planning Structure for U.S. Income Tax

Florida Bar Journal

Events

November 18, 2025

Welcome to America

Webinar

November 4, 2025

Breakfast During IBA in Toronto

Toronto Marriott City Centre Hotel

July 24, 2025

Just When I Thought I Was Out, They Pull Me Back In!

Virtual Event

September 17, 2024

Join Us for Breakfast During IBA in Mexico City

JW Marriott Mexico City Polanco

May 3, 2024

Foreign Company Executives Working in the United States

Atlantis Paradise Island

November 14, 2023

A Pre-Immigration Primer: Smart Tax Strategies for the High-Net-Worth International Family

Webinar

October 24, 2023

Fund Formation and Compliance

Dallas, TX

April 30, 2021

Tax Structuring for U.S. Real Estate Funds with Foreign GPs and Investors

November 10, 2020

Global Strategies: What Foreign Investors, Executives and Entrepreneurs Need to Know About U.S. Immigration & Tax Law

Webinar