

POSITION: SENIOR TAX ASSOCIATE

LOCATION: HC Global Fund Services, LLC in Glendale, CA.

JOB DUTIES:

- Prepare and review partnerships federal and state tax returns of hedged fund entities and management companies.
- Conduct and review various tax adjustments which includes wash sales, straddles, constructive sales, Section 1256 analysis, Section 988 analysis, Section 1233 analysis, dividend testing, monitoring of built-in-gains and losses, unsettled shorts and unrelated business taxable income (UBTI) analysis.
- Prepare and review federal and state tax returns of individual with various sources of income arising from conducting trade or business and/or passive sources of income.
- Prepare, review and file the Report of Foreign Bank and Financial Accounts (FBAR) of individuals with foreign accounts.
- Prepare and review Form 1042 on withholding tax on Fixed, Determinable, Annual, or Periodical (FDAP) income earned by foreign investors and application of withholding tax treaty rates on the said income, if applicable.
- Prepare and review Form 8804 to pay and report section 1446 withholding tax based on effectively connected taxable income (ECTI) allocable to foreign partners.
- Analyze the nature of income payments made to US vendors for purposes of preparing and reviewing Form 1099 to be filed annually with the Internal Revenue Service (IRS).
- Oversee the US FATCA and CRS registrations and reporting requirements of offshore companies incorporated in Cayman Islands and British Virgin Islands (BVI).
- Assist the offshore fund entities in determining their CRS classification, assist with the review of the CRS related documents submitted by the investors, and answer all US FATCA and CRS related enquiries of clients.
- Assist the clients in responding to the any CRS audit notification letter sent by BVI International Tax Authority (ITA) and/or Cayman Department for International Tax Cooperation (DITC).
- Liaise directly with BVI ITA and/or Cayman DITC for all CRS related matters that would address any issues or concerns encountered by the client. Assist the client for any letter notices received from the IRS or State Revenue Tax Department.
- Prepare letter response or call the applicable tax authorities to discuss the letter notices such as but not limited to assessment of penalty and/or interest due to late or non-filing of income tax return, setting up installment tax payment for individuals, changes on the tax return filed with regard to tax liability or tax refund.
- Research on new tax laws, rules and regulations issued by the IRS which affect the hedged fund and/or investment fund entities, prepare tax memo summarizing all the tax implications

involving US and offshore transactions and responding to clients queries with regard to the income tax return preparation and other related tax forms or reporting.

- Conduct tax training on FATCA and CRS reporting and other tax technical topic to various units within the company.
- Assist in reviewing the current tax software use by the tax team for possible upgrade and check other tax software available to make tax works more time and cost efficient. Prepare and review various engagement letters for the services provided by the company.
- Review and respond to any comments sent by the clients with regard to certain provision of the terms and conditions of the engagement letter.
- Prepare billings for FATCA and CRS services rendered, review and update the FATCA and CRS service fees, monitor existing engagement letters on the service fees and liaise with clients for any fee adjustments.

JOB REQUIREMENTS:

- Bachelor's or foreign equivalent degree in Accountancy/Accounting or related field, plus three (3) years of experience in accounting, tax advisory and compliance, or related field.
- Must also have education or experience in: Preparing and reviewing corporate tax returns and financial statements; Preparing FATCA and CRS related documents for companies with investments in private equity funds; Providing tax advisory services to resolve tax issues for new business ventures, cross border transactions, and equity restructuring; Conducting research on domestic and international tax laws; and Assisting with tax audits.

Send resume to: Joyce Regalado, 312 Sutter St., Suite 601, San Francisco, CA 94118.