



FREDERICK R. CHILTON, JR.

Managing Director, Tax

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Function and Specialization

Fred focuses his practice on the representation of high-technology and other companies on complex international tax matters.

Languages

English

Education, Licenses & Certifications

- University of California-Hastings College of Law, J.D., 1971
- New York University School of Law, LL.M., 1973

Background

Frederick R. Chilton, Jr. is a Managing Director in KPMG's International Tax practice and is based in the Firm's Silicon Valley office. He focuses his practice on the representation of high-technology and other companies on complex international tax matters.

Fred was a clerk to Judge Leo H. Irwin, United States Tax Court and a tax law specialist in the Foreign Rulings Group of the Internal Revenue Service.

Fred has been ranked as a leading tax lawyer (Band 1) in the latest, as well as previous editions of *Chambers USA: America's Leading Lawyers for Business* and is continually named one of the top tax advisors in the western United States in *International Tax Review* surveys. He has also been ranked in *Best Lawyers in America* for several years.

Among the issues that Fred has handled on behalf of clients with the IRS are Subpart F issues (foreign base company sales income, foreign personal holding company income and foreign base company services income) and cost sharing issues (buy-ins, SBC, and RAB). He also helps clients to plan for Subpart F (including substantial contribution analysis) and transfer pricing.

Professional and Industry Experience

- International Tax
- Tax Controversy
- Transfer Pricing

Publications and Speaking Engagements

Fred has been a speaker at various conferences. He has often spoken for and chaired seminars on behalf of the International Fiscal Association, Tax Executives Institute, Bloomberg/BNA and others. He has written a number of articles on a variety of International tax courses.