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Carl A. Merino

Planning for the Future

Growing up in California with two parents in the healthcare field, Carl Merino had a particular interest in medical ethics and healthcare delivery systems. He studied bioethics in college before enrolling at the University of California, Berkeley School of Law, originally envisioning a career in health law and policy.

But after taking his first course in income tax law in law school, Carl found a new path. "It really grabbed me," said Merino. "I enjoyed the logic puzzle aspect of it." He went on to pursue an LL.M. in Taxation from New York University.

Carl always had an interest in how complex systems work together and found the perfect fit practicing at the intersection of international tax and estate planning. He enjoys the intellectual challenge of figuring out how tax systems in multiple jurisdictions will impact a client's plan and working out strategies to balance competing tax considerations in different countries.

As part of Day Pitney's International Trusts and Estates team in New York, Carl's practice focuses on cross-border income and estate tax planning, advising both U.S. clients on foreign trust and entity structures and non-U.S. clients on inbound planning issues. His advice encompasses succession planning, as well as corporate and personal income tax planning. Among other things, his practice includes pre-immigration and expatriation tax planning, restructuring of foreign trusts and companies, planning for U.S. beneficiaries of foreign trusts, domestication of offshore structures, foreign anti-deferral rules and planning for liquidity events.

Carl advises many international families, working with local counsel in various jurisdictions around the world and navigating their tax systems to find solutions that work in multiple countries. In every situation, his mindset is to focus on whether his advice is in furtherance of the client's broader, long-term goal.

Jennifer Smithson, a partner at Macfarlanes LLP in London who has worked with Carl on several U.S./U.K. cross-border matters, said "He is able not only to identify the issues swiftly—adapting readily to the cross border nuances—but he also has the creativity to come up with solutions to the problems identified."

While interpreting tax law can many times mean digesting hundreds of pages of complex codes and regulations, Carl understands the need to synthesize information for clients in a succinct and understandable way that they can act on, often in situations where authority is limited and the law is unclear. "Clients don't come to you with a legal question, they come to you to help solve a problem."

When working to solve a client's immediate issues, Carl emphasizes it is equally important to be mindful of the client's future and non-tax considerations. "You need to view yourself as the family advisor. You're doing long-range personal and business planning—it's not just about tax," he said.

Another key aspect of Carl's practice is having the flexibility to react quickly to changing circumstances, recognizing that any solution developed for a client may be affected by changes in the business or regulatory landscapes. "There is always a new curveball, and it's always an interesting challenge," he said.

Carl's other interests include music, particularly classical, and creative writing. He describes a successful career in the law as handling work that is engaging with people with whom you genuinely enjoy working, which he has found at Day Pitney.

Key Contacts



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