

## Jaremi Chilton

Partner

San Francisco Houston

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### OVERVIEW

Jaremi handles matters relating to a wide variety of cross-border transactions concerning foreign investment into the U.S. and investment abroad. He performs complex transactions to maximize tax efficiency, limit liability, transfer personnel, and maintain compliance with U.S. and foreign laws. Jaremi performs analysis and recommends approaches to complex multijurisdictional issues, and he frequently consults and works with attorneys within and outside of the U.S. regarding international tax and immigration matters.

Jaremi's experience encompasses 7874 inversions, Subpart F, GILTI, FIRPTA, FATCA, and OVDP disclosures, international debt restructurings, debt-to-equity analysis, U.S. residents establishing residency in Puerto Rico or expatriating to other jurisdictions, and tax treaty analysis.

### REPRESENTATIVE MATTERS

- Flow Management Devices, LLC, in a completed acquisition by IDEX Corporation for approximately \$125 million.
- American Electric Technologies, Inc., in a share exchange transaction and related reverse stock split with Stabilis Energy LLC and its subsidiaries.
- Marimon Business Systems, Inc., in its equity sale for an undisclosed value to the Flex Technology Group, a portfolio company of private equity firm Oval Partners.
- Satellite Petrochemical USA Corp. and its China-based parent in a transaction involving the negotiation of a long-term purchase and sale agreement, as well as certain investment-related agreements, with an affiliate of Energy Transfer Partners.
- Accelerated Concepts, Inc., in its sale to Digi International for upfront cash of approximately \$17 million with a potential for future earn-out consideration based on top-line performance.
- Seaport Capital Partners in the closing of Seaport Capital Partners V, a \$230 million private equity fund.
- New Amtrol Holdings, Inc., and Amtrol Inc., a leading manufacturer of pressure cylinders and water system tanks, in Worthington Industries' acquisition of Amtrol for approximately \$283 million.
- Silver Oak Services Partners, LLC, a lower middle-market private equity firm focused exclusively on service businesses, in its partnership with management to lead the recapitalization of Legacy Farms, LLC.

## AWARDS

- Corporate Growth Houston, Cross-Border Transaction of the Year (2019)

## TOP AREAS OF FOCUS

- Tax

## ALL AREAS OF FOCUS

- Art
- Corporate
- Global Employment Issues
- Immigration
- International
- International Tax
- Tax

## PROFESSIONAL/COMMUNITY INVOLVEMENT

- Past chair, Houston Bar Association International Law Section
- Member, International Tax Forum of Houston
- Member, Houston Bar Association Taxation Section
- Member, American Bar Association Taxation and International Law Sections
- Participant, Meritas Leadership Institute Class (2008-2009)

## EDUCATION AND CERTIFICATIONS

### EDUCATION

- Georgetown University Law Center, LL.M.
- Santa Clara University School of Law, J.D.
- Brigham Young University, B.S.

### BAR ADMISSIONS

- California
- Texas

## PUBLICATIONS

- Co-author, "IRS Provides Guidance for Trusts Engaged in Staking," *Troutman Pepper Locke*, November 13, 2025.
- Co-author, "The One Big Beautiful Bill: Initial Analysis of Key Provisions for the Real Estate Industry," *Troutman Pepper Locke*, June 5, 2025.
- Co-author, "Navigating Change: First 100 Days Under the Trump Administration," *2025 Digital Asset*

*Developments, May 28, 2025.*