



## Dryden, John (Senior Foreign Counsel)

<b>Practice Areas</b>	Tax, Finance, Private Equity & Venture Capital, and Real Estate
<b>Tel</b>	+82-2-528-5077
<b>Fax</b>	+82-2-528-5228
<b>Email</b>	<a href="mailto:jdryden@yulchon.com">jdryden@yulchon.com</a>

John Dryden is a senior foreign counsel at Yulchon and co-leader of the International Tax Group. His practice focuses on cross-border tax and investment structuring, inbound tax planning, and controversy advice and support. Before joining Yulchon, Mr. Dryden was a managing director at an asset management group with private equity and real estate investments in Asia, Europe and South America. Prior to working for the asset management group, Mr. Dryden was a partner with one of the big four accounting firms where he focused his practice on inbound tax structuring, financial products and Islamic finance. He started his career as an honors program attorney at the IRS's Office of Chief Counsel in Washington, DC. Mr. Dryden has extensive experience in international tax transactions with a focus on Asia, cross-border tax and financial structuring, and advising on private equity, real estate and venture investments.

### Education

- Washington and Lee University School of Law, J.D. (1999)
- Univ. of California, Davis, Graduate Study Int'l Development (1995)
- Auburn University, B.A. Philosophy, Cum Laude (1992)

### Experience

- Yulchon LLC (2014-present)
- APD Ltd. / GEOC Management LLC, Malaysia (2009-2014)
- Ernst & Young, Seoul (2008-2009)
- Canaan Asset Management, Malaysia (2005-2008)
- PricewaterhouseCoopers, Seoul (2001-2005)



- Wharton, Aldhizer and Weaver, Harrisonburg (2000-2001)
- Internal Revenue Service, Office of Chief Counsel (1999-2000)

### **Representative Matters**

- Provided tax advice and appeal support to major U.S. technology company in relation to license royalties and other transactions with a Korean entity. (2016-17)
- Advised Visteon Corporation on the sale of its majority shares of Halla Visteon Climate Control Corp to Hahn & Co Auto Holdings (2015)
- Advising a consortium of investors led by MBK Partners, the largest independent private equity firm in North Asia, in its acquisition of Homeplus the Korean retail business unit of Tesco Group. (2015)

### **Honors and Recognitions**

- Named one of Korea's top tax advisors for cross-border investments, International Tax Review (2003)
- California Executive Fellow, California Governor Pete Wilson (1995)
- Fulbright Grantee to Korea conducting research on Buddhist monk Han, Yong Un, Fulbright (1992)

### **Qualifications**

- Virginia (2001)

### **Languages**

- English, Korean

### **Memberships**

- U.S Virginia State Bar (2001)
- American Bar Association (2001)