

PASSIVE FOREIGN INVESTMENT COMPANY PLANNING

High net worth individuals, international fund managers, attorneys and accountants turn to Marks Paneth & Shron LLP for planning and compliance advice relating to investments in Passive Foreign Investment Companies (PFICs). Through planning and compliance tools and expertise, we are able to minimize the tax implications of existing PFIC structures, establish PFIC structures to achieve tax deferral and minimization objectives and see that the complex information reporting and tax computation requirements are fully complied with.

In addition to our standard planning and compliance services, we have developed specialized structures and solutions that utilize PFICs as a planning vehicle.

Services Offered:

- Effective Tax Deferral Utilizing PFICs
- State and Local Income Tax Planning Through the Use of PFICs
- Analysis of the Impact of Qualified Electing Fund Elections
- Planning for the Termination of PFIC Status
- Compliance Programs for Fund Managers
- Analysis of PFIC Status
- Planning for US Beneficiaries of Offshore Estates and Trusts Holding PFICs
- Planning for Excess and Non-Excess Distributions
- Planning for Indirect Dispositions and Distributions
- Portfolio Management for PFICs
- Pre-Immigration/Emigration Tax Planning
- Planning for Coordination with Controlled Foreign Corporation Rules
- Planning for Coordination with Foreign Personal Holding Company Rules
- Analysis of Elections to Defer Payment of Tax
- Planning for the Wind-Up of PFICs
- Foreign Tax Credit Planning
- Basis Calculations
- Planning for the Avoidance of PFIC Status