

GLOBAL SOLUTIONS FOR CLOSELY HELD U.S. COMPANIES

Marks Paneth & Shron LLP'S clients considering foreign expansion face complex tax issues. By providing solutions for all of your company's foreign and domestic tax related needs we isolate the relevant factors for the closely-held company, and direct the planning process to create the best corporate tax environment possible.

Services Offered:

- Analysis of Alternate Foreign Expansion Methods Including: Direct Exporting, Franchisee/Licensee, Acquisition of Assets or Shares, Joint Venture, New Subsidiary or New Branch
- Accounting and Bookkeeping Services
- Isolation of Key Tax-Related Issues Associated with Globalization
- Incorporating the U.S. Statutory Tax Codes into the International Tax Planning Process
- Minimization of Overall Tax Burden, Evaluation of Foreign Tax Credit, and Possible Elimination of Entity-Level Taxation Based on Business Structure Analysis
- Evaluation of "Check the Box Election" Status and Regulations
- Maximization of Tax-Efficiency Through Utilization of Foreign Tax Credit Limitation
- Evaluation of Deductions Based on Passive Loss, Dual Consolidation Loss, Interest Stripping and "Double Dip: CV-BV"
- Repatriation of Foreign Earnings
- Use of Hybrid, Multi-Tiered, and Reverse Hybrid Entities to Minimize Tax Liabilities Domestically and Abroad
- Foreign Tax Credit Planning, Including Modeling Alternatives for High and Low Tax Jurisdictions
- Analysis of the Implication of Controlled Foreign Corporation and Passive Foreign Investment Company Rules
- Withholding Tax Planning
- Facilitation of Business Continuity in the Event of Death or Retirement
- Continuity Management Planning
- Estate and Gift Management Planning