

TAX TREATY AND FORUM CONSULTING

While the United States generally taxes its citizens in their worldwide income, most other jurisdictions do not, making double taxation a very real possibility. Although the tax treaties the United States has entered into have reduced the potential for double taxation, it remains paramount that taxpayers understand and take advantage of the opportunities such treaties provide them.

As individuals and corporations seek to navigate these treaties, they may turn to Marks Paneth & Shron LLP's specialized experts to help structure overseas assignments, minimize the tax burden experienced by expatriates, and ensure that all global tax filing and reporting requirements are met. Moreover, through our association with JHI, we are able to offer all of our clients with interests overseas a seamless and efficient way of meeting all their global income tax compliance and preparation needs.

Services Offered:

- Preparation of United States Federal, State, and Local Income Tax Returns
- Interpretation of Foreign Tax Treaty Provisions, Regulations and Stipulations
- Impact of Expatriation Rules
- Advisory Services for Offshore Trust Asset Protection Arrangements
- Impact and Effect of "Saving Clauses" on U.S. Citizens and Residents Income Tax Burden
- Planning Foreign Tax Credits
- Foreign Earned Income Tax Exclusion Planning
- Modeling of Foreign Tax Credit versus Foreign Earned Income Tax Exclusions to Achieve Most Efficient Global Tax Structure
- Liaison with Foreign Tax Preparers
- International Planning for Pension Fund and Social Security Benefits
- Impact of Treaty Provisions on Corporations and Hybrid Entities