

INTERNATIONAL TAX SERVICES

- Represented UK Company when it came to U.S. to acquire a business and provided U.S. tax advice and coordinated U.S. tax advice with tax advice in the UK, the Netherlands, Ireland, Luxembourg and Iceland
- Structured the reverse reorganization for a U.S. multinational company that wanted to move to Bermuda
- Provided tax advice for a U.S. private company to expatriate to Bermuda
- Advised numerous non-U.S. persons on U.S. tax issues concerning transfers of property, reporting gains from the sale of property, investments in U.S. assets and businesses
- Represented a closed in fund in addressing non-U.S. persons tax consequences and forming Bermuda investment vehicle
- Provided advice on spin offs of non-U.S. companies with U.S. shareholders
- Represented non-U.S. Company in its sale of the shares for cash to a U.S. Company and what reporting was required for the non-U.S. shareholders
- Represented many different foreign companies with regard to doing business in the U.S. and their U.S. and state and local tax responsibilities
- Obtain tax exemptions for U.S. nonprofits that conducted activities outside the U.S.