



International Planning & Compliance

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Dealing with tax issues that cross national jurisdictions can be dauntingly complex. Clients who have accumulated and/or maintain substantial assets overseas may face significant challenges when attempting to craft optimal tax planning strategies. IPB's attorneys can help guide you through the maze of relevant regulations that may impact your decisions regarding issues such as estate planning, investment strategies, and the creation of trusts.

Our team provides sophisticated gift, estate, and income tax planning for clients with internationally-based wealth. We also help our clients navigate the increasingly complex tax compliance environment, including new rules incorporated in recent tax law changes. Our planning covers both inbound and outbound movement of assets and individuals, and we help our clients achieve the best possible outcomes based on their individual facts and circumstances.

Representative matters include:

- Cross-border gift and estate tax planning that incorporates the client's succession planning in a tax-efficient way.
- Planning for inbound investments in U.S. real estate and other assets in the United States to avoid U.S. gift, estate, and income taxes.
- Counsel and advice for clients considering the use of foreign trusts.
- Pre-immigration tax planning for clients who intend to become U.S. residents or citizens.
- Pre-expatriation planning for U.S. citizens and long-term residents who may be subject to tax upon relinquishment of their status as a citizen or resident.
- Cross-border business tax planning that incorporates aspects of recently passed tax legislation including choice of entity issues.



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- Assisting clients who need to remedy past noncompliance with U.S. tax reporting and income recognition requirements.
- Providing counsel and U.S. tax advice in the context of international estate and trust administration.
- Tax treaty interpretation and planning.
- Providing advice regarding how to avoid income tax pitfalls including planning for investments in passive foreign investment companies.

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