



Tax Planning & Advisory Services

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Our tax planning practice focuses on structuring and negotiating business transactions such as mergers, acquisitions, spin-offs, joint ventures, and financings. We also regularly advise clients on internal restructurings, and help them analyze the implications of changes in tax law.

We continue to thrive as an independent tax firm because we offer our clients:

- **Proficiency.** Our lawyers have decades of experience among them and are recognized as thought leaders in the tax community. Our collaborative business model gets you the right professional for each stage of your project, without racking up unnecessary fees.
- **Experience.** Our team's wealth of experience in tax law stems from working in numerous practice environments: IRS, Treasury, Capitol Hill, large firm (law and accounting), and in-house. This breadth and depth of experience means we see problems from many different angles and are well equipped to develop practical, administrable solutions.
- **Responsiveness.** We pride ourselves on our extreme responsiveness to our clients. We aim to answer your questions quickly and efficiently, without overstaffing your projects.
- **Respect.** As a boutique firm, we know that good things come in small packages. No client or issue is too small for us. You will not get lost in the shuffle, as you might experience when working with a large firm practice.
- **Partnership.** Our first language is "tax," but we are fluent in communicating complicated tax concepts to a non-tax audience. We collaborate well with non-tax businesspeople, as well as with outside law firms advising on corporate and regulatory issues, to help you achieve your business objectives.



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Our clients include Fortune 100 and other public companies, as well as closely-held companies, partnerships, joint ventures, and individual shareholders. Recent matters on which our planning team has collaborated include:

- Representing several U.S. parent corporations in reorganizing foreign subsidiaries in tax-efficient holding company structures.
- Advising a public, Germany-based multinational on the U.S. implications of dozens of post-acquisition integration transactions (post-U.S. tax reform).
- Obtaining private letter rulings relating to public spin-offs and split-offs, such as:
 - H.J. Heinz spin-off of SKF Foods
 - Electrolux spin-off of Husqvarna
 - VISA International spin-off of European operations.
- Advising clients on tax implications of troubled company workouts, including limitations on loss carryovers.
- Helping U.S. individual shareholders understand the ramifications of the many new provisions in the 2017 tax act, including the so-called "GILTI" tax on offshore earnings and the deemed repatriation charge under section 965.

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