



TAX

An interesting by-product of Florida's growth is that it has become, in many ways, a bellwether state for a variety of tax and business issues – perhaps most notably wealth preservation and the emerging practice of elder law. But tax issues cross a myriad of disciplines and industries, as does our tax practice – whether state, federal or international in scope.

Many of our tax attorneys have post-graduate degrees in taxation and accounting, along with a wealth of experience in sophisticated tax matters such as entity taxation, income taxation, intangibles tax, estate tax and both the short and long-term tax impact of alternative solutions.

Our tax attorneys work closely with other attorneys in the firm, taking a lead role in the tax planning for and structuring of joint ventures, partnerships, [mergers](#), [acquisitions](#), reorganizations, divestitures, like-kind exchanges and real estate transactions, and other

business ventures. Working with the firm's corporate and securities law attorneys, our tax lawyers advise clients and issue tax opinions in connection with securitizations, securities offerings and other capital expansion programs. For closely held businesses, the tax attorneys often serve as both tax counsel and general business advisors. The tax attorneys also represent clients before the Internal Revenue Service in connection with federal income tax disputes.

Florida Tax

We have extensive knowledge of Florida's corporate income tax, sales tax, documentary stamp tax, recurring intangible tax, non-recurring intangible tax, and ad valorem property tax.

Our tax attorneys have experience consulting with and representing clients before the Florida Department of Revenue, in both adversarial and non-adversarial settings. And, we have experience in monitoring – and occasionally influencing – the legislative and rule-making process on Florida tax issues.

Federal Tax

Our tax attorneys work closely with the firm's real estate, corporate, securities, bond, public finance, securitization, healthcare and other business lawyers to provide tax advice, issue tax opinions and offer creative tax planning to the firm's clients. Our tax attorneys take a lead role in the tax planning for and structuring of joint ventures, partnerships, mergers, acquisitions, reorganizations, divestitures, like-kind exchanges and real estate transactions, and in selecting the appropriate type of entity to utilize for a given business venture.

Our tax attorneys also work closely with the firm's corporate law and securities attorneys in advising clients and issuing tax opinions in connection with securitizations, securities offerings and other capital expansion programs. For closely held businesses, our tax attorneys oftentimes serve as both tax counsel and general business advisors and work closely with the firm's corporate and other business lawyers to meet the specific needs of our clients. Our tax attorneys also represent clients before the Internal Revenue Service in connection with federal income tax disputes.

International Tax

Our tax attorneys represent clients in both inbound and outbound activities. We advise:

- U.S. ventures engaged in investments, construction projects and other operations in foreign jurisdictions;
- U.S. tax exempt organizations with operations in foreign jurisdictions;
- U.S. entities moving operations outside of the United States;
- U.S. citizens living in the U.S. or abroad with U.S. tax reporting obligations, including matters relating to the U.S. Internal Revenue Service's FBAR (Report of Foreign Banks and Financial Accounts) regulations and the application of FATCA (Foreign Account Tax Compliance Act);
- foreign-based individuals and entities on federal and Florida tax laws applicable to owning property and doing business in the U.S.;
- foreign persons investing in or moving to the U.S. on business and estate planning matters.

We work in tandem with our estate planning attorneys, as well as our clients' foreign tax advisors, to minimize U.S. and worldwide taxation of our clients' income and assets.

Moreover, we have experience analyzing U.S. income and estate tax treaties with other countries and in establishing tax efficient structures. Additionally, through our membership in [Meritas](#), a network of over 170 law firms - all rigorously qualified, independent and collaborative, we have access to a global alliance of 7,124 experienced lawyers in 175 full-service law firms serving 236 markets around the world.



Check out our [tax blog](#) which helps advise individuals on a variety of tax and business issues!