

International Tax Structuring



Middle-market companies are transforming into multinational organizations at an amazing pace. Globalization provides excellent opportunities to grow an organization. Before you get too far in the process, let us help.

Our international tax professionals have positioned numerous organizations to take advantage of the U.S. and/or foreign tax benefits available. We provide insight to suggested strategies, as well as help to formulate your new entity and make required tax elections.

Explore your options.

Our process begins by gaining an understanding of your organization and mission. We explore all aspects of your pending expansion, including:

Location: Are you moving into the ideal location? Our professionals make certain the organization you set up abroad fits within your U.S. structure. We help you select appropriate entity structure, taking into account interplay of U.S.-based tax rules with the tax rules applicable to foreign investors in their country of residence or other potentially applicable locations.

Financing: How will you finance this expansion? Whether you're looking at a start-up or acquisition, our team can help determine the best financing structure.

Profitability: What is the likelihood of losses? For many start-ups, it takes several years before the entity is profitable. Our professionals will analyze the likelihood and develop a plan to minimize the financial impact.

Investment: How will your entity's profits be retained? Decisions have to be made on where to invest the new organization's profits. Will you reinvest in the entity, divert to another foreign location or distribute to the United States? We can help you look at the big picture to help ensure you are investing in the most beneficial way.

Review current structure.

Even if you are not considering an expansion, we can help spot opportunities in your existing structures. We'll thoroughly review your entire organization to spot opportunities to minimize your global tax position.

For more information, contact:

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