

## INTERNATIONAL TAX

In an increasingly interconnected global economy, international tax laws and regulations present unique challenges for businesses and individuals operating across borders. Taxpayers face mounting complexity in navigating foreign tax policies, addressing compliance issues, and structuring transactions that align with both U.S. and international tax laws. These complexities, coupled with heightened scrutiny by tax authorities, demand careful planning and strategic guidance.

Berger Singerman's International Tax Practice Group provides sophisticated, tailored advice to clients engaged in multinational operations, inbound and outbound transactions, and cross-border investments. Our attorneys are adept at addressing the full spectrum of international tax issues, combining deep technical knowledge with practical solutions to help clients achieve their goals in the most tax-efficient manner.

### Our Expertise Includes:

- **Inbound Transactions:** Assisting non-U.S. businesses and investors in structuring U.S. operations and investments to optimize tax outcomes while mitigating risks. This includes advising on U.S. real property investments, organizational structures to minimize U.S.-source income, and compliance with transfer pricing regulations.
- **Outbound Transactions:** Guiding U.S. businesses expanding abroad by designing tax-efficient organizational structures, global supply chain arrangements, and strategies for ownership and exploitation of intangible assets.
- **Cross-Border Transactions:** Structuring acquisitions, mergers, and joint ventures involving entities across multiple jurisdictions to maximize tax benefits and ensure compliance with international tax laws.
- **Transfer Pricing:** Advising on transfer pricing strategies and preparing documentation for inter-company transactions involving tangible and intangible property, ensuring compliance with U.S. and foreign tax regulations.
- **Tax Treaties and Compliance:** Navigating the complexities of international tax treaties and advising on the application of treaty provisions to reduce withholding taxes and mitigate double taxation.
- **Global Tax Minimization:** Developing strategies to minimize tax exposure for multinational enterprises, including advising on tax-efficient repatriation of earnings and foreign tax credit utilization.

Our International Tax Practice Group stands out for its multidisciplinary approach, combining tax, corporate, and regulatory expertise to provide comprehensive solutions. We represent a diverse clientele, including multinational corporations, private equity firms, closely held businesses, and high-net-worth individuals. Whether addressing the nuances of cross-border compliance, structuring global operations, or resolving international tax disputes, we are dedicated to delivering exceptional service and innovative strategies tailored to our clients' unique needs.