DANIEL W. HUDSON

Partner

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Daniel W. Hudson is a Partner in the firm's Miami office and a member of the firm's Business, Finance & Tax Team and the International Tax Group.

Daniel frequently advises high net worth individuals, family offices, trust companies, private equity funds, as well as multinational corporations on addressing a variety of the US and cross-border business-related issues and international tax, trust, and succession planning issues. With a concentration on international taxation and business planning, Daniel's practice includes (i) advising US and foreign individuals regarding design and implementation of cross-border business structures, acquisitions and joint ventures; (ii) addressing US federal and state tax (including treaty-related) issues for foreign clients investing or doing business in the US, especially with regard to inbound investments in US real estate and other issues involving the Foreign Investment in Real Property Tax Act (FIRPTA); (iii) advising foreign individuals who are considering immigrating or temporarily moving to the US and families with one or more members who are US citizens or are currently residing in the US; (iv) advising US individuals and corporations on structuring of foreign businesses and investments; (v) assisting US and foreign clients with US tax compliance and regularization issues (both federal and state); (vi) assisting US client with expatriation tax planning; and (vii) addressing trust and estate law, as well as any ancillary tax issues, in relation to US and foreign trusts and estates and cross-border families.

As a tax practitioner, Daniel represents taxpayers before the Internal Revenue Service in connection with audits, IRS Appeals, installment agreements, offers in compromise, penalty abatements, offshore voluntary disclosures, and other administrative matters. Daniel also represents businesses before the Florida Department of Revenue in relation to sales and use tax and corporate tax issues, as well as voluntary disclosures and workouts.

Education

LL.M. in Taxation, New York University School of Law
with International Tax Concentration
J.D., Hofstra University School of Law
Summer Program, Faculte de Droit de L'Universite de Nice
B.S. in Economics, Villanova University, College of Commerce and Finance

Bar Admissions

Florida
New York

Practice Teams

Business, Finance & Tax

Practice Areas

Taxation
International & Cross Border Transactions
Wealth Preservation & Estate Planning
Family Office
Private Equity & Venture Capital
Fund Formation
Mergers & Acquisitions
Securities & Capital Markets
Corporate
Latin America & Caribbean Practice
Opportunity Zones
International Tax