

## People



## John B. Buckun

Partner, Tax

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vCard

John Buckun focuses his practice on federal, state and local, and international tax matters. John represents closely held companies, middle market clients, private equity funds, and multinational corporations on all aspects of taxation including, the formation, operation and liquidation of partnerships, S corps, and C corps. He has substantial experience in creating and implementing tax efficient structures for mergers and acquisitions, restructurings and recapitalizations, and financing transactions.

John also specializes in advising inbound and outbound companies on tax matters related to international activity. He has extensive experience in structuring cross border transactions, including tax efficient acquisition and holding company structures, repatriation planning, IP migration, and internal restructurings strategies. He frequently counsels clients on the insertion of debt into United States and foreign entities, identification and minimization of subpart F income, the utilization of foreign tax credits, FIRPTA analysis, treaty analysis, and the reduction of withholding tax.

In addition, John advises clients on strategies for the abatement of penalties (for late or improper Form 1099 filings and U.S. international tax reporting including Forms 5471, 5472, 926 and FBAR filings); Section 1202 analysis and planning; and structuring and tax reporting positions for the cannabis industry (including reporting for tax versus legal ownership and minimizing tax exposure under Section 280E).

### Related Professional Experience

- Miller, Cooper & Co., Ltd., Principal, 2017-2021
- PricewaterhouseCoopers LLP, Mergers & Acquisitions/International Tax Services, Director, 2011-2015
- EY, National Practice, Senior Manager, 2004-2011

### Honors and Distinctions

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#### Areas of Experience

Tax  
 Corporate Tax  
 International Tax  
 State and Local Tax Consulting

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#### Education

J.D., University of Chicago Law School, 1999  
 B.S., Eastern Illinois University

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#### Admissions

##### Bars

Illinois  
 Oklahoma

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#### Related Content

Akerman Earns Top National Rankings in *The Legal 500 United States*  
 June 10, 2022

Akerman Expands Tax Practice Group with Partner Erika Labelle in Denver  
 April 05, 2022

Akerman Continues Expansion of Tax Practice Group with Partner John Buckun in Chicago  
 November 12, 2021

- *The Legal 500* 2022, Recommended for U.S. Taxes - Contentious
- Illinois Certified Public Accountant, 1994