

Practices

# International Tax

International transactions and operations are subject to a multiplicity of overlapping and complex regulations and requirements. As the globalization of business continues to increase, companies need counsel with worldwide knowledge and experience to deftly handle tax issues that arise wherever business takes them.

Akerman's International Tax Practice provides sophisticated tax planning services that enable clients to navigate the global tax environment, as well as a strong record of success in resolving tax controversies. Our team monitors U.S. and international tax policy reforms to help clients manage everything from foreign withholding and branch profits taxes to foreign tax credits.

We help clients structure their international operations as tax efficiently as possible and provide strategic counsel on a broad spectrum of issues affecting international businesses, including the establishment of foreign subsidiaries, transfer pricing, planning for the repatriation of earnings, and using foreign tax credits. We offer both significant experience and current knowledge to provide IRS representation on international matters, as well as on international tax compliance issues. Should international tax disputes arise, we leverage firm resources to provide clients with a path to swift and successful resolution.

## What We Do

- Inbound and outbound transactions

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## Connect With Us



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## Our Team

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## Related Work

Corporate Tax  
Immigration Planning  
and Compliance  
International  
Latin America and the  
Caribbean  
M&A and Private Equity  
Tax  
Trusts and Estates

- Foreign withholding tax
- Sourcing
- Inversion
- Foreign Investment in Real Property Tax Act
- Branch profits tax
- International tax treaties
- U.S. estate tax and pre-immigration planning directed at diminishing the impact of U.S. taxes after the establishment of U.S. tax residency
- Deferral of U.S. taxation of foreign income
- Foreign tax credits
- Minimizing taxation on a worldwide basis
- Transfer pricing