

Practice Contacts

- Eric B. Woldenberg

Attorneys**Partner**

- Michael P. Dunworth
- Eric B. Woldenberg

Associate

- Terrill Jordan

International Tax Planning

Pryor Cashman's Tax Group, in conjunction with our foreign affiliations, alliances and other local counsel, provides advice about international tax planning to a wide variety of clients, including U.S. and foreign corporations and companies, wealthy individuals, celebrities, athletes and multinational corporate executives and families with members and assets in multiple jurisdictions.

Our tax attorneys have extensive experience in developing and implementing tax-efficient structures for cross-border transactions and business operations in sectors such as motion picture production and distribution, real estate development and many others. The crucial first step in this process is choosing the particular legal entity and its debt and equity capitalization. We guide our clients in this selection process which affects the tax costs of repatriating income from ongoing operations and gains from the exit strategy, as well as the availability of lower tax rates, or the elimination of tax, under favorable international tax treaty networks.

The Tax Group at Pryor Cashman advises U.S. corporate and individual investors and investment funds on all aspects of U.S. income tax relevant to foreign outbound investment, including choice of entity and jurisdiction, income tax treaties, foreign withholding taxes, foreign tax credit planning and the operation of U.S. anti-deferral provisions.

Pryor Cashman's Tax Group has assisted international companies in developing cross-border equity and other compensation plans incorporating such diverse elements as profit interests in limited liability companies. We have also assisted in structuring international joint ventures involving multiple foreign jurisdictions in which the legal entities involved may have disparate and inconsistent treatment in the different taxing jurisdictions, so-called hybrid entities. A major portion of the advice provided by the Tax Group in the international context involves guiding non-U.S. companies and individuals on the appropriate structures for inbound investment in various U.S. businesses and real estate.