

International Tax Group

As business becomes increasingly international at all levels, from the multinational to the sole proprietor, it is more likely than ever that your business will need to plan its tax strategy on an international basis. Due to the complex interplay between and among U.S. tax rules, non-U.S. tax rules and double-taxation treaties, properly integrated and cohesive tax planning is essential when business spans international borders. Sullivan & Worcester's international tax attorneys have the experience to handle this complex interplay, while providing effective and useful advice and developing practical strategies.

Sullivan & Worcester has one of the largest international tax practices in the Northeast. The legal practice of many of our 35 tax lawyers includes a significant international tax planning component, and four of our lawyers focus primarily in international taxation.

Our tax specialists have extensive experience in strategic tax planning and implementation for a wide range of international business activities and taxes, including:

- structuring tax-efficient international mergers, acquisitions, dispositions and reorganizations
- designing cross-border financing strategies
- planning for foreign tax-credit utilization
- migrating intellectual property to tax-favored jurisdictions
- maximizing opportunities for deferral of U.S. tax on foreign earnings
- using favorable holding company regimes in various foreign countries
- reducing worldwide effective foreign tax rates
- developing capital structures and repatriation strategies
- documenting and defending intercompany transfer-pricing matters
- assisting with cross-border real estate investments
- advising sovereign wealth funds, foreign governmental pension plans and other foreign governments as to their U.S. investments, including real estate investments

We have established a worldwide network of foreign tax counsel with whom we collaborate regularly. To achieve our clients' objectives, however, we often assume responsibility for coordinating both the U.S. and non-U.S. tax aspects of transactions.

Representative Client Work

- Advised the U.S. shareholders of a large foreign investment management firm on how best to preserve tax deferral of non-U.S. income
- Represented Irish sponsors in the structuring and formation of private, externally advised, blind pool U.S. REITs to raise capital in Ireland and invest in U.S. commercial real estate
- Implemented a foreign reorganization involving 20 countries for a major publicly traded manufacturer
- Assisted one of the world's largest mobile telephone operators and several other telecommunications providers with various tax issues related to expansion into the United States and foreign markets
- Provided international tax and structuring advice to one of the world's largest asset management firms in connection with its \$27 billion bid for a global media and entertainment company
- Advised a large publicly traded chemical company in its \$100 million acquisition of a Japanese company and through the creation of hybrid entities and use of internal leverage achieved significant annual foreign tax savings

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For further information about our International Tax Group, please visit our website at www.sandw.com or contact:

Lewis J. Greenwald at 617 338 2950
(lgreenwald@sandw.com) or
Douglas S. Stransky at 617 338 2437
(dstransky@sandw.com) or