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Douglas S. Stransky is a U.S. international tax partner in the Tax Department of our Boston office. Mr. Stransky concentrates his practice on international tax planning for clients in a wide range of industries with a particular emphasis on U.S.-based clients investing in foreign jurisdictions. Before joining Sullivan & Worcester, Mr. Stransky was the Director of International Tax Services and a member of the National Outbound Team at PricewaterhouseCoopers LLP. Previously, he held various management positions in the hospitality industry.

**REPRESENTATIVE CLIENT WORK**

- Structured numerous tax efficient multi-jurisdictional mergers, acquisitions, dispositions and reorganizations for public and private clients in the financial services, life sciences, manufacturing, private equity, technology and venture capital industries
- Designed cross-border financing strategies, including hybrid debt structures, for multiple domestic and foreign acquisitions and restructurings and assisted clients in the recapitalization of foreign operations to reduce foreign tax burdens and enhance foreign earnings repatriation efficiency
- Advised clients on capital loss planning, foreign tax credit utilization, foreign holding company structures, treasury and cash flow management, transfer pricing and migration of intellectual property to tax-favored jurisdictions
- Led a worldwide team of attorneys and other advisors to restructure foreign operations in 20 countries for a \$2 billion public manufacturing company
- Served as lead counsel for a 10 country reorganization of a public manufacturing company
- Advised U.S. and non-U.S. clients on structuring cross-border real estate investments ranging from \$10 million to \$600 million
- Represented public and private clients in matters before the U.S. Internal Revenue Service, including controversies, voluntary disclosures related to offshore activities and private letter rulings
- Advised a developer of telephone-based applications on various income

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and indirect tax issues related to its overseas expansion

- Represented one of the world's largest mobile phone operators and several other telecommunications providers with various tax issues related to expansion into the United States and into several foreign markets
- Counseled nonresident families on pre-immigration U.S. tax and estate planning matters

#### BAR & COURT ADMISSIONS

- Massachusetts
- U.S. District Court, District of Massachusetts
- U.S. Tax Court

#### PUBLICATIONS

- "Supreme Court Will Not Review First Circuit's Textron Decision," *Journal of International Taxation*, Quoted (August 2010)
- "A Guide to the New Foreign Tax Credit Rules and Other Revenue Raisers," *Worldwide Tax Daily*, Quoted (August 19, 2010)
- "Tax Window Stays Open," *Treasury & Risk*, Quoted (August 2, 2010)
- "Douglas S. Stransky Quoted in Articles Discussing the Supreme Court's Denial of Textron's Petition," *Tax Notes Today, Worldwide Tax Daily, Federal Taxes Weekly, Reuters, International Tax Review*, Quoted (May 2010)
- "Legislative Summary of Extenders Legislation Unveiled with Significant International Revenue Raisers," *International Taxes Weekly*, Quoted (May 24, 2010)
- "Practitioners Discuss FATCA Provision on Statute of Limitations," *Tax Notes International*, Quoted (May 24, 2010)
- "Practitioners Discuss FATCA Provision Expanding Statute of Limitations," *Worldwide Tax Daily*, Quoted (May 20, 2010)
- "The Good, the Bad, and the Uncertain: An Examination of the International Tax Proposals from the Obama Administration, the HIRE Act, and the Tax Extenders Bill," *Practical International Tax Strategies* (May 2010)
- "Squeezing Foreign Firms," *Boston Business Journal* (May 7, 2010)
- "IRS International Enforcement Extends to Cases of No Tax, Practitioner Cautions," *Daily Tax Report*, Quoted (April 29, 2010)
- "Obama's Budget Drops Check-the-Box Repeal, Adds International Provisions," *Worldwide Tax Daily*, Quoted (February 2, 2010)
- "All Tied Up," *INSIGHT Magazine*, Quoted (February 2010)
- "Textron Wants Supreme Court's View on Work Product Privilege," *International Tax Review*, Quoted (January 2010)
- "Textron, Inc. Petitions Supreme Court to Review the First Circuit's Evisceration of the Work Product Privilege," *Practical U.S./Domestic Tax Strategies* (December 2009)
- "The Fabulous New Substantial Contribution Test Is Made Even More Fabulous," *Journal of International Taxation* (December 2009)
- "The Future for Tax Services: Why Regulation Threatens Non-Audit Work," *International Tax Review*, Quoted (November 2009)
- "Joint Committee Produces Report on Obama Budget Proposals," *International Tax Review*, (continued)

Quoted (October 2009)

- "Obama Seeks to Tax Outbound Transfers of Workforce in Place," *Journal of International Taxation* (September 2009)
- "Attorneys Predicting 'Upheaval' in Wake of Work-Product Ruling," *Massachusetts Lawyers Weekly*, Quoted (August 24, 2009)
- "*United States v. Textron, Inc.*: The First Circuit *En Banc* Eviscerates the Work Product Doctrine and Creates a New 'Prepared For' Test," *Practical U.S./Domestic Tax Strategies* (July 2009)
- "Getting Personal: New K-1 Deadline Will Mean Time Crunch," *Dow Jones Newswires*, Quoted (June 17, 2009)
- "Getting Personal: A Tax Break for Unsold GM Shares," *Dow Jones Newswires*, Quoted (June 5, 2009)
- "Getting Personal: Stressing Over Offshore Tax Filing," *Dow Jones Newswires*, Quoted (June 3, 2009)
- "Code Section 457A Requires Immediate Attention by Certain Sponsors of Nonqualified Deferred Compensation Arrangements," *Practical U.S./International Tax Strategies* (June 2009)
- "Obama Proposals Could Have Drastic Impact on Leveraged Companies, Practitioner Says," *Daily Tax Report*, Quoted (May 21, 2009)
- "Getting Personal: Obama Goes After Secret Offshore Accounts," *Dow Jones Newswires*, Quoted (May 5, 2009)
- "Obama's Corporate Tax Proposal Panned by Advocacy Group," *Investment News*, Quoted (May 5, 2009)
- "Obama Unveils International Tax Reforms," *International Tax Review*, Quoted (May 2009)
- "Rhetoric Surrounding Obama's International Tax Proposals Detracts From Real Debate, Practitioner Says," *Worldwide Tax Daily* (May 1, 2009)
- "Through the Glass [Even More] Darkly: Revisions to the Not-So-Fabulous Branch Rule," *Journal of International Taxation* (May 2009)
- "An International Tax Wish List for the New President," *Boston Business Journal* (March 13, 2009)
- "First Circuit Vacates *Textron* Work-Product Privilege Ruling and Grants Petition for Rehearing *En Banc*," *Practical U.S./Domestic Tax Strategies* (March 2009)
- "Obama Sets Out to Transform Tax System," *International Tax Review* (February 2009)
- "*United States v. Textron, Inc.*: A Hollow Taxpayer Victory for Privilege in the First Circuit," *Practical U.S./Domestic Tax Strategies* (January 2009)
- "Converting a Disregarded Foreign Entity to a Corporation: More than Just Checking the Box," *Practical U.S./International Tax Strategies* (October 2008)
- "Important Energy-Related Tax Measures Included in Bailout Legislation," *Bailout Tax Briefing: A White Paper*, at p. 14 (*WorldTrade Executive*, eds., 2008) (October 2008)
- "Important Energy-Related Tax Measures Included in Bailout Legislation," *Practical U.S./Domestic Tax Strategies* (October 2008)
- "IRS Enhances Opportunity for U.S. Multinationals to Access Cash from Controlled Foreign Corporations," *Practical U.S. /International Tax Strategies* (October 2008)
- "IRS Enhances Opportunity for U.S. Multinationals to Access Cash from Controlled Foreign Corporations," *Bailout Tax Briefing: A White Paper*, at p. 5 (*WorldTrade Executive*, eds., 2008) (October 2008)
- "The Fabulous New "Substantial Contribution" Test," *Journal of International Taxation* (October 2008)  
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- "Doing Business Overseas Can be Taxing Experience," *Mass. High Tech* (November 2, 2007)

#### **TEACHING & SPEAKING ENGAGEMENTS**

- "Massachusetts Biomanufacturing Roundtable," Massachusetts Life Sciences Collaborative (June 2010)
- "Intermediate U.S. International Tax for Non-International Tax Professionals," BNA Tax & Accounting Audio Conference (May 2010, May and September 2009)
- "Introduction to U.S. International Tax for Non-International Tax Professionals," BNA Tax & Accounting Audio Conference (April 2010, May and September 2009)
- "International Tax Reform and the Obama Administration Proposals," International Fiscal Association (April 2010)
- "Establishing International Operations," Financial Executives International (March 2010)
- "Cross-Boarder Acquisition and Sale of Real Estate," Sullivan & Worcester LLP, New York (February 2010)
- "48th Annual Tax Institute," Western New England College, School of Business (November 2009)
- "Structuring Foreign Disregarded or Check-the-Box (CTB) Entities," Council for International Tax Education, New York (July 2009)
- "Outbound Asset Transfers to a Foreign Corporation;" "International Mergers & Acquisitions;" and "Dispositions of Controlled Foreign Corporation Stock," ATLAS Information Group, New York (April 2009)
- "Dramatic Transformations in Corporate Tax Law and the Financial Statement Implications to Your Company," Financial Executives International, Boston (January 2009)
- Guest Lecturer, Advanced International Taxation, Boston University School of Law Graduate Tax Program (January, February and March 2009, January and February 2008)
- "Tax Careers Panel," Boston University School of Law Graduate Tax Program, Boston (October 2008 and 2009)
- "Tax Aspects of International Acquisitions & Reorganizations: Overview of Subchapter C Acquisition and Reorganization Rules and Section 367(a) Stock Transfers," ATLAS Information Group, Chicago (October 2008)
- "U.S. Tax Issues in Structuring Foreign Operations," BNA Tax & Accounting Audio Conference (October 2008)

#### **AWARDS & HONORS**

- *Best Lawyers in America* (2011)
- "Rising Star," Massachusetts *Super Lawyers* (2009)

#### **PROFESSIONAL & CIVIC ACTIVITIES**

- Co-Chair, International Tax Committee, Boston Bar Association
- Advisory Board, *Practical U.S./International Tax Strategies*
- International Fiscal Association
- Section of Taxation and Committee on Foreign Activities of U.S. Taxpayers (FAUST), American Bar Association
- Essex County Bar Association
- Director and Clerk, Boston Cares
- Pro Bono Panel, Children's Law Center of Massachusetts

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## EDUCATION

- LL.M., Taxation, University of Miami School of Law
- J.D., *cum laude*, University of Miami School of Law; Projects Editor, *Miami Law Review*
- B.A., *cum laude*, Harvard University