

Tax

With centuries of combined experience, Greenspoon Marder LLP's domestic and international tax attorneys have the in-depth knowledge and experience necessary to guide our clients effortlessly through the often-complicated and ever-changing tax system. Our team represents individuals, corporations, partnerships, trusts and estates, governmental agencies and tax-exempt organizations in a wide variety of business and personal tax matters throughout the state, country and the world. While we prefer to work with our clients proactively, we also represent our clients before taxing authorities.

Our team has experience in advising state and federal government officials in the drafting of legislation. We routinely monitor proposed changes in tax statutes and regulations throughout the U.S., keeping our clients apprised of major revisions.

Our attorneys handle a wide range of matters, including but not limited to:

General Corporate Tax Planning

- Determining appropriate entity for new enterprises to achieve diverse tax and financial objectives of each participant in the business
- Advising clients on pre-incorporation planning
- Consulting with clients on prospective tax liabilities from the structuring and/or disposition of business enterprises
- Structuring proposed transactions to achieve business goals of the client, while obtaining optimal tax benefits
- Consulting with clients and their accountants on the proper reporting of transactions for state and federal income
- Forming and documenting "single purpose entities" for securitized loan transactions
- Structuring real estate like-kind exchanges and reverse exchanges
- Representing clients on the tax consequences of bankruptcy and other workout situations
- Integrating estate planning for the client with business and income tax planning
- Counseling as to asset protection planning for business and personal
- Structuring settlement agreements in divorce cases to achieve the financial and tax objectives of the parties

Partnerships and Limited Liability Companies

- Analyzing proposed transactions to determine effect of rules governing special allocations, passive loss limitations and at-risk requirements
- Structuring partnerships and limited liability companies with tax-exempt or foreign partners to comply with rules governing these relationships.

Tax-Exempt Organizations and Charitable Planning

Our attorneys are particularly proud of their involvement in the creation and operation of various tax-exempt, charitable organizations. They have particular experience in:

- Drafting applications for recognition of tax-exempt status for organizations, as well as providing advice to maintain that exemption

- Analyzing and structuring all aspects of tax-exempt financing to ensure that interest on such financing is exempt from federal income taxation
- Evaluating business opportunities for gift and estate tax benefits to maximize the transfer of wealth by our clients.

Deferred Compensation, Pension Plans and Employee Benefits

Our team regularly advise clients on the structure of employee compensation and the long-term accumulation of wealth and are involved in:

- Structuring and drafting qualified retirement and welfare plans, such as pension and profit sharing, employee stock ownership and qualified stock option plans
- Drafting non-qualified deferred compensation arrangements for both taxable and tax-exempt organizations
- Analyzing the status of workers as employees or independent contractors.

Tax Litigation and Administration

- Representing taxpayers at all levels before Internal Revenue Service and Florida Department of Revenue in audits, collections, field conferences and administrative appellate proceedings
- Representing taxpayers before United States Tax Court, United States District Court, United States Claims Court, Circuit Courts of Appeal and Supreme Court
- Applying and negotiating with Internal Revenue Service for private letter rulings and technical advice memoranda and with Florida Department of Revenue for technical assistance advisements
- Structuring transactions to minimize Florida documentary stamp and intangible taxes, and advising on property tax assessment procedures
- Obtaining technical assistance advisements and other rulings and positions from the Florida Department of Revenue
- Assisting homeowners with regards to the Florida homestead laws and the "Save Our Homes" cap on increase in assessments
- Analyzing and structuring foreign and domestic entities and transactions for foreign taxpayers conducting business in the United States to minimize their worldwide estate and income tax exposure
- Valuating and structuring foreign and domestic entities and transactions for U.S. taxpayers conducting business overseas
- Counseling clients on tax compliance matters in the U.S. and abroad.

State Taxation

- Structuring transactions to minimize Florida documentary stamp and intangible taxes, and advising on property tax assessment procedures
- Obtaining technical assistance advisements and other rulings and positions from the Florida Department of Revenue
- Assisting homeowners with regards to the Florida homestead laws and the "Save Our Homes" cap on increase in assessments.

International Tax

In recent years there has been a proliferation of investments by foreign individuals and entities in Florida, as well as business opportunities for U.S. taxpayers overseas.

Our clients include:

- Closely held businesses headquartered in the U.S. with foreign operations;
- Closely held businesses headquartered outside the U.S. with U.S. operations;

- Law firms & accounting firms that have clients with the above types of activities;
- Non-resident aliens with U.S. business and/or investment activities;
- Non-resident aliens that own U.S. real estate;
- Publicly traded corporations with cross-border activities; and
- U.S. citizens and residents with non-U.S. business and/or investment activities.

As a result of representing clients in various numerous international tax matters, we are skilled in:

- Analyzing and structuring foreign and domestic entities and transactions for foreign taxpayers conducting business in the United States to minimize their worldwide estate and income tax exposure
- Valuating and structuring foreign and domestic entities and transactions for U.S. taxpayers conducting business overseas
- Counseling clients on tax compliance matters in the U.S. and abroad.

Related Areas

- Banking & Finance
- Bankruptcy and Reorganization
- Corporate
- Government Relations
- Public Finance

News

- Greenspoon Marder Partner Nick Richards Publishes "Sales And Use Taxes: Colorado" For Thomson Reuters
- Greenspoon Marder Acts As Lead Counsel For Westgate Resorts Largest Securitization Deal
- Greenspoon Marder Expands Tax Capabilities With Addition of New Partner James Guadiana in New York
- Greenspoon Marder Client Alert: Business Restructuring
- Greenspoon Marder Supports CannaVest East
- Greenspoon Marder Continues Strategic Growth Of National Cannabis And Tax Law Capabilities With Addition Of New Partner Nick Richards
- Greenspoon Marder Partner Rachel Gillette And James Mann Featured Speakers On AICPA Webcast
- Greenspoon Marder Partner Rachel Gillette and James Mann to be Featured Speakers at American Institute of Certified Public Accountants National Tax Conference
- Greenspoon Marder Attorneys Recognized In Florida Trend's 2019 "Legal Elite"
- Greenspoon Marder Partner James Mann Featured Speaker At 2019 Opportunity Zone Expo In Las Vegas
- Greenspoon Marder Hosts The Cannabis Investment: Real Estate, Opportunity Zones & NYC
- Greenspoon Marder Supports the 2019 Arcview Investor Forum in Los Angeles
- Greenspoon Marder Expands Tax Law Capabilities With Addition of New Partner James B. Mann in New York
- Greenspoon Marder Expands Tax Law Capabilities With Addition of New Partner James B. Mann in New York
- Greenspoon Marder Client Alert: 2017 Tax Act
- Greenspoon Marder Shareholder Laurence "Larry" I. Blair Named New Chair Of Local Jacobson Jewish Community Foundation
- Greenspoon Marder Supports The Jewish Federation Of South Palm Beach County And PAC Primetime
- Greenspoon Marder Supports The Jewish Federation Of Broward County
- Greenspoon Marder Shareholder Barry Engel To Receive Lifetime Achievement Recognition At SouthPac Conference

- Eight Attorneys From Greenspoon Marder Listed In The Best Lawyers Business Edition 2017
- Greenspoon Marder Shareholder Laurence "Larry" I. Blair To Be Honored At 2017 Mitzvah Society Reception

Videos

- Webinar: Tax Planning For Foreign Investment In U.S. Real Estate Webinar
- Webinar: Cannabis in Quarantine - Burning Questions We Hear Most

Publications

- Greenspoon Marder Client Alert: Business Restructuring
- Cannabis REITs - What You Need to Know
- ANOTHER 280E DEFEAT FOR THE CANNABIS BUSINESS TAXPAYER
- Greenspoon Marder Client Alert: 2017 Tax Act

Meet the Team

- Andrew Bechel
- Laurence I. Blair
- Gregory J. Blodig
- Edward D. Brown
- Alan B. Cohn
- Rachel K. Gillette
- Ellen Gilmore
- Gene K. Glasser
- James Guadiana
- Brent D. Klein
- David P. Kron
- Carl H. Linder
- Nick Richards
- Douglas Schmidt
- Carl Schuster
- James Valvano

