

International Tax Planning

As international borders continue to break down from the perspective of business transactions and operations, Goulston & Storrs clients are increasingly looking for new markets for their products, new resources to support their business objectives, and foreign and United States-based partners to participate in international joint ventures and strategic alliances. The members of our Tax Group have the necessary expertise to help clients understand the tax opportunities and pitfalls of cross-border investments and operations and to structure both in-bound and out-bound transactions in a manner that facilitates the goal of reducing double taxation and maximizing deferral for cross-border investments. These transactions require an in-depth knowledge of the interpretation and application of bilateral income tax treaties, the effective use of entities organized in tax haven jurisdictions, domestic and foreign entity selection, the tax treatment of instruments denominated in foreign currencies, and the effective use of foreign tax credits to minimize overall tax costs on a global basis. Whether our U.S. clients are doing business "across the pond" or our Canadian clients are exploring opportunities "south of the border", our Tax Group stands ready to help them successfully balance the United States and foreign tax considerations to maximize the efficiency of the operation as a whole.