

## Taxation

### **Leech Tishman's Taxation Practice Group provides creative tax planning strategies to individuals, publically owned companies, closely held businesses, non-profit organizations and private foundations.**

#### **In Brief**

Our lawyers have over 40 years of experience in corporate and tax law matters, as well as practical knowledge in financial accounting. With an intricate understanding of federal, state, and local tax laws, along with up-to-date knowledge of sophisticated tax planning techniques, we assist individuals and businesses in many industry sectors with forming a tax plan that minimizes their risk and enhances their bottom lines.

Many of our lawyers are Certified Public Accountants (CPAs). Our grasp of fundamental accounting principles has helped the firm forge strong, working relationships with small and regional public accounting practices. We are accustomed to partnering with our clients' financial advisors and accountants to provide a legal perspective on legal and tax issues.

Our lawyers are frequent and respected advocates before federal, state and local taxing bodies, including the Internal Revenue Service, the Pennsylvania Department of Revenue and the U.S. Tax Court, where we represent clients on a wide variety of issues, ranging from IRS disputes and U.S. Tax Court appeals to sales tax audits and Commonwealth Court appeals.

Our team works closely with the Estates & Trusts Practice Group to effectively address any tax issues involved with complex client situations where both income tax planning and estate planning issues are important to the outcome.

#### **Services**

Our lawyers have experience in the following areas:

- » Transactional income tax analysis
- » Tax planning for mergers and acquisitions
- » IRS audits and appeals
- » State tax disputes
- » International taxation issues
- » U.S. taxation for foreign companies and individuals
- » Tax exempt formation and operation & tax analysis for non-profit organizations/private foundations
- » Assisting taxpayers with foreign bank accounts and property to annually report such accounts and assets
  - If the taxpayer has failed to properly report such assets, to assist the taxpayer in disclosing such accounts and assets to the IRS in a manner that will minimize penalties

#### **Captive Insurance Companies**

- » Formation of captives to cover risks that are commercially expensive or impossible to cover with conventional insurance
- » Single parent captives for generation of tax deductions and asset protection/estate planning
- » Health care captives to replace traditional third party insurance
- » Protected cell captives

#### **Business and Personal Income Tax Planning**

- » Tax planning for high-net-worth individuals
- » Tax planning for corporations, partnerships, limited liability companies, limited liability partnerships, and other entities
- » Gift tax planning
- » Captive insurance companies
- » General business succession counseling
  - Structuring of corporate successor planning and privately-held share transfer agreements