

Transactional Tax Planning

Kegler Brown's transactional tax planning attorneys provide clients with efficient solutions to enhance economic return by minimizing tax costs. We regularly advise entrepreneurs, closely held businesses and their owners, and domestic and foreign multinational corporations. Our tax attorneys partner with lawyers in multiple practice areas to provide integrated services related to evaluating, negotiating and structuring a wide variety of transactions.

Our Services

Our tax attorneys have extensive experience with the tax ramifications relating to:

- + Corporations, partnerships, LLCs and joint venture arrangements, including exempt and for-profit organizations
- + Taxable and tax-free reorganizations, liquidations, mergers and acquisitions
- + Taxation of real estate transactions, including New Market tax credits, real estate funds and joint ventures
- + Executive compensation arrangements, including stock options, restricted stock grants, stock appreciation rights plans and other equity-based plans
- + Structure and taxation of tax-exempt and philanthropic organizations
- + Strategic state and local tax-saving opportunities
- + Debt workouts
- + Income taxation of trusts and estates and income tax aspects of estate planning
- + Charitable giving

Our tax attorneys also provide counsel on foreign tax matters, including structuring inbound and outbound investments, branch profits tax, transfer pricing, interest-stripping, tax withholding, and tax treaties. We advise on the establishment of foreign entities, including hybrid entities, controlled foreign corporations and passive foreign investment companies; we also focus on maximizing foreign tax credits on worldwide income and on tax residency issues.

Our Clients

We primarily serve entrepreneurs and closely held businesses headquartered in Ohio; most are organized as LLCs or S corps, but we have experience representing businesses of all kinds, including:

- + **Public companies:** advice on restructuring their transactions in the most tax-efficient manner
- + **Entrepreneurs and closely held businesses:** counsel on entity, merger and acquisition, and pass-through entity structuring to reduce income tax liabilities to their legal minimum; structuring and drafting complex distribution

waterfall provisions and related tax allocation provisions in partnership and LLC agreements for investment vehicles and operating businesses; advising businesses on non-income tax questions like withholding, excise tax, sales and use tax, and property tax issues

- + **Investors, including private equity groups:** representation on structuring acquisition and disposition transactions to minimize income taxes; structuring ownership entities to achieve business and tax objectives

Contact Us

For more information on our transactional tax planning services, please contact Todd M. Kegler.

Our Team

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Eric D. Duffee, Director

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