

## INTERNATIONAL TAX

### Practice

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#### PRIMARY CONTACTS

SAM LICHTMAN  
T +1 212.659.4971  
F +1 212.884.8229

Our international tax practice focuses on providing innovative and practical solutions in all phases of cross-border tax work, including:

- Cross-border mergers and acquisitions;
- Structuring transactions to avoid the inversion rules;
- CFC and PFIC analysis and planning;
- Planning for multinational corporations;
- Inbound investment in the United States by foreign investors, and in particular, foreign investment in U.S. real estate;
- Outbound investment in foreign jurisdictions by United States private equity funds;
- Upstream investment fund structuring for foreign investors in United States funds;
- Optimizing global tax structures;
- Intercompany cross-border debt;
- All aspects of FATCA compliance and planning, and
- Foreign tax credit planning.