

Global solutions for closely held U.S. companies

Decosimo clients considering foreign expansion face complex tax issues. By providing solutions for all of your company's foreign and domestic tax-related needs we isolate the relevant factors for the closely-held company, and direct the planning process to create the best corporate tax environment possible.

Decosimo offers a full range of international tax services, including:

- Analysis of alternate foreign expansion methods including: Direct Exporting, Franchisee/Licensee, Acquisition of Assets or Shares, Joint Venture, New Subsidiary or New Branch
- Accounting and bookkeeping services
- Isolation of key tax-related issues associated with globalization
- Incorporating the U.S. statutory tax codes into the international tax planning process
- Minimization of overall tax burden, evaluation of foreign tax credit, and possible elimination of entity-level taxation based on business structure analysis
- Evaluation of "Check the Box Election" status and regulations
- Maximization of tax-efficiency through utilization of foreign tax credit limitation
- Evaluation of deductions based on passive loss, dual consolidation loss, interest stripping and "Double Dip: CV-BV"
- Repatriation of foreign earnings
- Use of hybrid, multi-tiered, and reverse hybrid entities to minimize tax liabilities domestically and abroad
- Foreign tax credit planning, including modeling alternatives for high and low tax jurisdictions
- Analysis of the implication of controlled foreign corporation and passive foreign investment company rules
- Withholding tax planning
- Facilitation of business continuity in the event of death or retirement
- Continuity management planning
- Estate and gift management planning

