

SERVICES TO FOREIGN BUSINESSES OPERATING IN THE UNITED STATES

Overseas individuals and entities seeking to establish a business presence in the United States must be prepared to navigate not only federal tax law, but the complexities of state and local taxing authorities as well. Berdon's international tax team advises "inbound" businesses on ways to meet their U.S. tax obligations while keeping taxes to a minimum, staying compliant, and avoiding common and obscure tax pitfalls. We also regularly monitor for changes in the law and tax code to keep clients updated on developments that may impact their business.

As members of TIAG® and TAGLaw®—alliances of accounting and law firms that spans the globe—we are able to coordinate our services with the laws and rules of your home country. We offer a fully coordinated service designed to help your transition take place smoothly and efficiently, while keeping costs to a minimum.

WHAT IS TAXED?

Foreign corporations engaged in trade or business within the United States during the taxable year are only taxed on gross income which is effectively connected with the conduct of a trade or business within the US.

ARRAY OF SERVICES

Inbound Tax and Accounting Services

- Federal tax planning and compliance
- State and local jurisdiction tax planning and compliance
- Data gathering for U.S. international tax forms — 1118, 5471, 8865, 8858, 5472, 1120-F
- U.S. international tax calculations:
 - Foreign Tax Credit
 - Subpart F
 - Section 956
 - Earnings and profits
- Accounting and tax preparation for foreign nationals and foreign owned businesses
- Consulting on tax controversies with federal, state, and local taxing authorities
- Guidance on U.S. withholding and reporting for payments made to foreign persons

Business Services

- Site location and due diligence for acquisitions
- Structuring and choice of entity
- Structuring for acquisition, rental, operation, and disposition of U.S. real estate
- Incorporating a U.S. subsidiary
- Developing payroll, sales tax procedures, and other essential services
- Establishing U.S banking relationships
- Developing employee benefit packages
- Local business registrations
- Identifying any government incentives
- Assisting in relocating essential employees to U.S.

Transfer Pricing

Berdon works with multinational organizations to develop, manage, and plan for transfer pricing. Our services include preparing domestic and worldwide documentation to comply with local requirements, assisting with aligning tax planning objectives and business objectives, and assessing and managing the tax risk.

- Individuals and Trusts
- Federal, state, and local jurisdiction tax planning and preparation
- Tax issues for non-citizens immigrating to the U.S.
- Trust, estate, and gift tax planning and returns for non-citizens with U.S. based assets
- U.S. beneficiaries of foreign trusts

If you would like additional information, please contact your Berdon advisor or Saul Brenner at 212.699.6706 | sbrenner@BERDONLLP.com.