



International Taxation Services

► Capabilities

By utilizing the International Taxation Services of Alpern Rosenthal, United States and foreign-based multinational companies have a solution to their international tax needs. These international businesses face a wide range of business and tax issues. These



challenges increase in complexity as companies expand their international business operations. The firm's International Taxation Services helps clients structure their international operations in the most tax efficient manner. In addition, we work with our network of offices around the world to provide high quality, country-specific tax advice.

Alpern Rosenthal has been successful in helping our clients minimize their worldwide tax burdens. We seek to use our experience to help our clients reduce the significant complexity faced when doing business abroad.

Alpern Rosenthal is a member of the Leading Edge Alliance, an international association of more than 160 experienced, independent accounting and business advisory firms with over 450 offices worldwide. At Alpern Rosenthal, we are an innovative firm dedicated to shaping the long-term relationships that have advanced our clients' businesses.

► We offer a broad range of international tax services including:

- Assistance with entering new countries/markets — providing guidance on local country tax laws, VAT, etc.
- Establishing foreign subsidiaries — analyzing the consequences of establishing foreign subsidiaries and facilitating contact with local country legal assistance
- Transfer pricing — providing guidance on acceptable transfer pricing methods and required documentation
- Technology transfer — assisting with technology licensing issues
- International acquisitions/ reorganizations — working with the U.S. and foreign tax aspects of acquiring a business abroad
- Planning for repatriation of earnings — providing alternatives which will facilitate repatriation of earnings
- Foreign tax credit utilization — maximizing foreign tax credit utilization
- Foreign investment in the U.S. — helping foreign businesses plan for U.S. investment
- IRS representation on international matters — representation before IRS international examiners or appeals agents
- International tax compliance — ensuring tax compliance and avoiding potential penalties