



U.S. Inbound International Tax Services

ASKFROST.COM

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What You Need to Know

To effectively navigate the complex international tax laws, Frost Law offers clients a broad range of international tax services. We help our clients understand the laws and regulations and meet their compliance and reporting obligations. More importantly, we help them identify and reduce their tax risks and implement sound, practical, and efficient tax strategies that will address their needs today and into the future.

Our approach combines strong understanding of our client's business, the economic environment, and technical tax knowledge in different jurisdictions. We assist multi-national organizations and high-net worth individuals engage in tax planning to minimize overall tax burden.

Inbound Tax Services

U.S. Inbound Tax
Planning

Withholding Tax
Due Diligence and
Compliance

Tax Treaty Planning
and Interpretation

Investment in U.S.
Real Property

Inbound Tax Planning

Non-U.S. headquartered companies and HNW foreign individuals wishing to establish presence in the U.S. either by operating a business or simply investing in passive opportunities face challenges of a complicated, high-cost tax system and a web of asymmetrical state tax rules. Without proper tax advise and planning, a business and investment may be put at risk for non-compliance and higher tax exposure.

A complex tax system such as the U.S., offers alternatives for companies to structure operations in tax-efficient manner. Carefully crafted structure presents potential opportunities with proper consideration of legal entity classification, use of tax treaty benefits, utilization of intellectual property, inter-company transaction, supply chain rationalization, M&A planning and exit strategy.

Navigating the complex web of international tax rules is daunting and missed planning opportunities can be costly for international businesses. Contact the Frost Law tax team to learn about our comprehensive and international tax services and dedicated professionals.

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Doing Business in the U.S.

With corporate income tax rate now one of the lowest in the world, many foreign based companies are looking into doing business in the U.S. and avail of the 21% income tax rate, its stable economy and predictable business and fiscal policies. We advise foreign-based companies on appropriate U.S. entity structure and use tax treaty benefits to minimize overall tax exposure.

U.S Real Property Transaction

Foreign Investment in Real Property Tax Act (FIRPTA) imposes a tax on the gains of non-US person from the sale of U.S. real property. The gain or loss of non-US persons from the disposition of a US real property interest are treated as if the taxpayer were engaged in a trade or business within the US and as if such gain or loss were effectively connected with such trade or business. Investment in US real property interest has many traps for the unwary.

Withholding Tax Due Diligence

Our team can perform due diligence services to U.S. corporations and other entities who are withholding agents of U.S.-source income and determine withholding and information reporting requirements for U.S. federal income tax purposes. We will review current accounts payable and other accounting systems and procedures to determine payments requiring withholding under the rules and recommend controls and processes to comply with the Internal Revenue Code.

Inbound Tax Compliance

Frost Law provides assistance in reviewing U.S. reporting of inbound transactions, such as: (i) Form 5472 – for foreign owned U.S. corporations, (ii) Form 1120F – for U.S. federal income tax liability of foreign entities, and (iii) FIRPTA filings for foreign persons owning U.S. real property interest.



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