

FEDERAL TAX PLANNING



Our attorneys understand the intricacies of the federal tax code, as well as the tax implications of day-to-day and strategic business transactions. That's why at Husch Blackwell, tax law and corporate law are integrated pursuits. We are committed to helping businesses minimize their tax liabilities, avoid potential tax pitfalls, and capitalize on unique opportunities. Clients appreciate our vast experience, depth of knowledge, and creative and practical solutions.

U.S. Congress makes significant changes to federal tax law almost every year, while the Internal Revenue Service (IRS) publishes its own guidance and promulgates or updates regulations. Federal tax courts issue hundreds of tax rulings each year. But our clients can focus on their business, knowing that we stay abreast of the many changes and will advise as needed.

Our federal tax planning guidance to clients includes:

Tax-free transactions with real estate investment trusts (REITs)

Golden parachutes

Midco/intermediary transactions

Economic substance/business purpose doctrine

Debt versus equity as it relates to advances from one party

Contact Information

Daniel B. Geraghty
414.978.5518
daniel.geraghty@
huschblackwell.com

Jason A. Reschly
816.983.8170
jason.reschly@
huschblackwell.com

to another

Worthlessness of debt

Reasonable compensation

Valuation

Repair versus capitalization

Purchase price allocations

Method of accounting change

Net investment income

Section 269

Choice of entity

Section 83

Consolidated return

Section 6901/transferee

Passive activity loss

Sham transactions

Like-kind exchanges

Personal versus business goodwill

Tax-free corporate divestitures