



Tax, Corporate and Individual

Procopio has one of the largest Tax Law practices in the region, providing sophisticated, complex tax planning and structuring for businesses, individuals, tax-exempt organizations and international ventures of all sizes and in respect of a wide variety of industries. Proper structuring of tax matters is a critical part of doing business, and our tax attorneys serve as an integral part of our clients' transactional team. Our tax attorneys work closely with colleagues in the [Employment](#), [Corporate and Securities](#) and [Real Estate Law](#) Groups in structuring a wide variety of complex business relationships. We advise clients on international cross-border aspects of their transactions and operations, and our team has numerous attorneys fluent in foreign languages.

OUR SERVICES

Transactional Tax

We have substantial experience in structuring and advising on all tax aspects of the purchase and sale of businesses, mergers, corporate reorganizations and other transfers of ownership interests in businesses, including to and from publicly traded corporations.

We are adept at organizing, structuring and negotiating partnership agreements and limited liability company agreements, as well as structuring the most tax efficient methods for distributing and selling assets by these entities, redemption of ownership interests and the use of partnerships and limited liability companies in connection with complex estate planning strategies.

Additionally, we provide comprehensive counsel to non-profit and charitable organizations, advising on the technicalities of federal and state tax exemption, tax-exempt financing, unrelated business income taxation and non-profit corporate governance. We represent a broad range of tax-exempt entities, including health care organizations, private schools and other educational organizations.

Our tax attorneys work closely with colleagues in the Employment Law, Corporate and Securities and Real Estate Groups in structuring a wide variety of complex business relationships.

International Tax

We have extensive experience advising clients in complex international cross-border transactions, helping them obtain the most tax efficient structures for cross border business operations. This includes United States and non-United States based businesses, structuring both inbound and outbound transactions and handling tax controversies involving international transactions before the United States Internal Revenue Service (IRS). A number of our international tax attorneys are also licensed to practice





in Mexico.

Estate and Gift Planning

We advise clients on all aspects of gift and estate tax planning, including assisting multinational clients in reducing their United States estate and gift tax obligations.

Tax Controversy

We represent clients in all aspects of federal, state and local tax controversies including audits, administrative appeals and litigation in the U.S. Tax Court, U.S. Court of Federal Claims and the Federal District, Bankruptcy and Appellate Courts.

Tax Resources

IRS (International) Letter Regarding Mexican Fideicomisos; U.S. Taxpayer Informational Filing Requirements

