



Florida's dynamic growth has positioned it as a litmus test for various tax and business issues, notably in wealth preservation and the emerging field of elder law. Our tax practice is at the forefront, providing straightforward solutions for state, federal, and international tax matters.

Our tax attorneys, many of whom hold post-graduate degrees in taxation and accounting, bring substantial experience to intricate matters like entity taxation, income taxation, intangibles tax, estate tax, and the nuanced tax implications of alternative solutions. Collaborating closely with other firm attorneys, we take a lead role in tax planning and structuring for joint ventures, mergers, acquisitions, and other business transactions.

Working with our corporate and securities law attorneys, our tax lawyers provide strategic counsel and issue tax opinions related to securitizations, securities offerings, and capital expansion programs. For closely held businesses, our tax attorneys serve as both tax counsel and general business advisors.

Additionally, we represent clients in federal income tax disputes before the Internal Revenue Service.

Florida Tax

We have extensive knowledge of Florida's corporate income tax, sales tax, documentary stamp tax, recurring intangible tax, non-recurring intangible tax, and ad valorem property tax.

Our tax attorneys have experience consulting with and representing clients before the Florida Department of Revenue, in both adversarial and non-adversarial settings. And, we have experience in monitoring – and occasionally influencing – the legislative and rule-making process on Florida tax issues.

Federal Tax

Our tax attorneys also work closely with the firm's corporate law and securities attorneys in advising clients and issuing tax opinions in connection with securitizations, securities offerings and other capital expansion programs.

Key Contact

Matthew R. O'Kane

Related Professionals

Julia L. Frey
Alyson C. Kendust
Matthew R. O'Kane
Norma Stanley



For closely held businesses, our tax attorneys oftentimes serve as both tax counsel and general business advisors and work closely with the firm's corporate and other business lawyers to meet the specific needs of our clients.

Our tax attorneys also represent clients before the Internal Revenue Service in connection with federal income tax disputes.

International Tax

Members of our Tax Group work closely with the firm's real estate, corporate, securities, bond, public finance, securitization, healthcare and other business lawyers to provide tax advice, issue tax opinions and offer creative tax planning to the firm's clients.

We take a lead role in the tax planning for and structuring of joint ventures, partnerships, mergers, acquisitions, reorganizations, divestitures, like-kind exchanges and real estate transactions, and in selecting the appropriate type of entity to utilize for a given business venture.

Our tax attorneys represent clients in both inbound and outbound activities. We advise:

- U.S. ventures engaged in investments, construction projects and other operations in foreign jurisdictions;
- U.S. tax exempt organizations with operations in foreign jurisdictions;
- · U.S. entities moving operations outside of the United States;
- U.S. citizens living in the U.S. or abroad with U.S. tax reporting obligations, including matters relating to the U.S. Internal Revenue Service's FBAR (Report of Foreign Banks and Financial Accounts) regulations and the application of FATCA (Foreign Account Tax Compliance Act);
- · Foreign-based individuals and entities on federal and Florida tax laws applicable to owning property and doing business in the U.S.;
- · Foreign persons investing in or moving to the U.S. on business and estate planning matters.

We work in tandem with our estate planning attorneys, as well as our clients' foreign tax advisors, to minimize U.S. and worldwide taxation of our clients' income and assets. Moreover, we have experience analyzing U.S. income and estate tax treaties with other countries and in establishing tax efficient structures.

Additionally, through our membership in Meritas, a network of over 170 law firms - all rigorously qualified, independent and collaborative, we have access to a global alliance of 7,124 experienced lawyers in 175 fullservice law firms serving 236 markets around the world.



News

Lowndes Named to 2024 "Best Law Firms" by Best Lawyers 11.10.2023 | AWARDS & RECOGNITION

14 Lowndes Attorneys Named to Orlando Family Magazine's "Awesome Attorneys 2023" 02.21.2023 | AWARDS & RECOGNITION

14 Lowndes Attorneys Named to Orlando Family Magazine's "Awesome Attorneys 2022" 02.15.2022 | AWARDS & RECOGNITION

12 Lowndes Attorneys Named to Orlando Family Magazine's "Awesome Attorneys 2021" 02.11.2021 | AWARDS & RECOGNITION

Property-Tax Exemptions for Senior-Living Facilities: Application Deadline is March 1, 2021 01.14.2021 | GRAY AREA OF THE LAW BLOG

Forty-Three Lowndes Lawyers Earn Recognition in Best Lawyers in America 2020 08.15.2019 | AWARDS & RECOGNITION

Events

Tax Issues in Transferring LLC and Partnership Interests: Navigating the Complex IRS Rules for Buying, Selling, or Redeeming Partnership Interests 01.25.2024 | EVENTS

Liquidation of S Corporations: Mastering Tax Implications of Liquidating Distributions 11.16.2022 | WEBINAR

Opportunity Zones 10.25.2021 | WEBINAR

Publications

New Law Further Reduces Florida's Sales Tax Rate on Commercial Rent 04.12.2024 | LOWNDES LEASING LAWYERS BLOG

Property Tax Exemptions for Senior Living Facilities: Application Deadline is March 1, 2024 02.08.2024 | GRAY AREA OF THE LAW BLOG

Worried About Your ERC Refund Claim? IRS Announces Process to Withdraw Pending Claims 10.19.2023 | LOWNDES TAXING TIMES BLOG

New Law Reduces Florida's Sales Tax Rate on Commercial Rent 10.18.2023 | LOWNDES LEASING LAWYERS BLOG

Too Good To Last? IRS Halts Processing of ERC Claims 09.15.2023 | LOWNDES TAXING TIMES BLOG

Too Good To Be True? Be Wary of ERC Promoters 09.06.2023 | GRAY AREA OF THE LAW BLOG



Applications for Low-Income Communities Bonus Tax Credits to Open in Early Fall 08.10.2023 | LOWNDES TAXING TIMES BLOG

Have a Partnership? March 15th Deadline Offers a Window of Opportunity 03.03.2023 | ARTICLE

Good News: IRS Grants \$1.2 Billion in Penalty Relief for Taxpayers Impacted by Covid-19 09.06.2022 | GRAY AREA OF THE LAW BLOG

Solar Industry to See Historic Investment from Inflation Reduction Act 08.04.2022 | ARTICLE

Renewed Opportunities: Recent Bipartisan Proposal Seeks to Refine Opportunity Zone Development and Tax Incentives

04.18.2022 | ARTICLE

IRS Extends Tax Day to May 17 03.18.2021 | LOWNDES TAXING TIMES BLOG

IRS Extends Much-Needed Opportunity Zone Relief 01.20.2021 | ARTICLE

New COVID-19 Relief Bill Allows Deductibility of Expenses Paid with Forgiven PPP Loans 12.21.2020 | LOWNDES TAXING TIMES BLOG

New Treasury and IRS Regulations Bless SALT Deductions for Pass-through Entities 11.10.2020 | LOWNDES TAXING TIMES BLOG

Disney Tax Ruling & Property Valuation 09.03.2020 | LOWNDES LEGAL TALK

IRS Provides Much-Needed Opportunity Zone Relief 06.05.2020 | ARTICLE

IRS Extends Like-Kind and Qualified Opportunity Zone Deadlines 04.10.2020 | ARTICLE

\$2.2 Trillion Stimulus Bill Includes Big Benefit For Real Estate Investors and Other Taxpayers With Excess Business Losses

03.27.2020 | ARTICLE

Property Tax Payment Deadline Extended to April 15 03.26.2020 | ARTICLE

A Summary of the Tax Benefits Included in the Senate Passed \$2.2 Trillion Stimulus Bill 03.26.2020 | ARTICLE

The Check May Soon Be In the Mail: McConnell Introduces Tax Relief Legislation 03.20.2020 | ARTICLE

Tax Day Moved From April 15 to July 15 03.20.2020 | LOWNDES TAXING TIMES BLOG



Treasury Department Extends Tax Payment Deadlines 03.18.2020 | ARTICLE

Industry News Briefs: The Multi-family Sector Ends With a Bang In 2019 01.15.2020 | ARTICLE

Florida Commercial Lease Sales Tax Rate Further Reduced 08.12.2019 | LOWNDES LEASING LAWYERS BLOG

Qualified Opportunity Zones: What Are They And Why Should I Care? 10.25.2018 | ARTICLE

IRS Issues Guidance on Qualified Opportunity Zones 10.22.2018 | ARTICLE

Tax Court Decision Another Blow to Medical Marijuana Industry 06.15.2018 | ARTICLE

Tax Cut and Jobs Act Limits Benefit of Carried Interest 03.02.2018 | ARTICLE

Time to Reconsider Your Choice of Entity? 02.22.2018 | ARTICLE