

## Tax

An interesting by-product of Florida's growth is that it has become, in many ways, a bellwether state for a variety of tax and business issues – perhaps most notably wealth preservation and the emerging practice of elder law. But tax issues cross a myriad of disciplines and industries, as does our tax practice – whether state, federal or international in scope.

Many of our tax attorneys have post-graduate degrees in taxation and accounting, along with a wealth of experience in sophisticated tax matters such as entity taxation, income taxation, intangibles tax, estate tax and both the short and long-term tax impact of alternative solutions.

Our tax attorneys work closely with other attorneys in the firm, taking 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 other business ventures. Working with the firm's corporate and securities law attorneys, our tax lawyers advise clients and issue tax opinions in connection with securitizations, securities offerings and other capital expansion programs. For closely held businesses, the tax attorneys often serve as both tax counsel and general business advisors. The tax attorneys also represent clients before the Internal Revenue Service in connection with federal income tax disputes.

### 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. 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

### Key Contact

Matthew R. O'Kane

### Related Professionals

Julia L. Frey

Alyson C. Hoffman

Matthew R. O'Kane

Andrew Powell

Norma Stanley

Amanda Wilson

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 full-service law firms serving 236 markets around the world.

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Check out our tax blog which helps advise individuals on a variety of tax and business issues!

### News

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

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

## Events

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

Opportunity Zones  
10.25.2021 | WEBINAR

## Publications

Too Good To Last? IRS Halts Processing of ERC Claims  
09.15.2023 | GRAY AREA OF THE LAW 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

New Law Reduces Florida's Sales Tax Rate on Commercial Rent  
06.09.2023 | LOWNDES LEASING LAWYERS 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

Choosing the Right Entity for Your Business  
03.29.2022 | 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

IRS Provides Much-Needed Opportunity Zone Relief  
06.05.2020 | ARTICLE

IRS Extends Like-Kind and Qualified Opportunity Zone Deadlines

04.10.2020 | ARTICLE

Tax Day Moved From April 15 to July 15

03.20.2020 | LOWNDES TAXING TIMES BLOG

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

03.20.2020 | ARTICLE

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