

INTRODUCING:

Universal Tax Planning & Compliance



A Legacy of Loyalty

INDUSTRIES IN WHICH OUR CLIENTS OPERATE

The streamlined solution for the new global economy

Despite the evidently seamlessness of conducting global business from Houston, one of the country's most international city, the complexities of U.S. and overseas tax planning and compliance has grown only more evident. This complexity is enhanced in the frequent instances in which individual and corporate assets are intermixed. Briggs & Veselka's Universal Tax Planning & Compliance team offers proactive guidance for businesses and individuals who wish to minimize their tax liabilities and simplify compliance with the ancillary regulations that accompany international commerce.

Typical circumstances we have seen lately include:

- U.S. based offshore investment made possible by the new global economy
- The increase of foreign investment in the U.S. by individuals, businesses, and corporations
- A variety of different holdings and/or entity structures
- Ownership by an individual of different businesses

- *Agriculture*
- *Construction*
- *Energy*
- *Financial Institutions*
- *Healthcare*
- *Manufacturing & Distribution*
- *Maritime*
- *Non-Profit*
- *Professional Services*
- *Real Estate*
- *Restaurants & Hospitality*
- *Retail*



The Universal approach to tax planning and compliance can streamline the complex world of U.S. and non-U.S. individual and business tax regimes.



Crystal Gates
CPA
Tax Principal
cgates@bvccpa.com
713-353-1955

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Because we bring our fully integrated experience with both foreign and domestic tax compliance, along with consulting on ancillary issues such as residency for tax treaty applicants, Briggs & Veselka can provide a single-stop solution for U.S. taxpayers with overseas assets or foreign nationals currently living or planning to live or invest in the U.S.

Compliance	Business Entities		Personal	
	U.S.	Foreign	U.S.	Foreign
U.S. Income Tax				
U.S. and Foreign Entities				
Corporations	X	X		
Pass-Through Entities	X	X	X	X
Branch Offices	X	X		
Individuals				
U.S. Citizens & Residents			X	
Non-Residents				X
Expatriates			X	X
Ancillary Regulations				
Withholding/Exemptions				
Foreign Withholding	X		X	
Outbound Payments	X	X	X	X
Exemptions	X	X	X	X
Informational (FinCen, FATCA)	X	X	X	X
Global Investments				
Passive Foreign Investment Companies	X		X	
Foreign Gifts/Foreign Trusts	X		X	X
Controlled Foreign Entities	X		X	
Foreign Currency	X	X	X	X
IRS Controversy	X	X	X	X
Integration & Planning				
Global Structuring/International				
Business Modeling				
Merger and Acquisitions	X	X		
Dispositions	X	X	X	X
Intellectual Property Migration	X	X		
Profit Repatriation	X	X		
Anti-Deferral Regimes	X	X	X	
Investment in U.S. Real Property		X		X
Tax Treaty Analysis				
Income Sourcing	X	X	X	X
Foreign Retirement Plans/Pensions	X		X	
Double Tax Relief				
Tax Credit Optimization	X	X	X	X
Foreign Earned Income Exclusion			X	
Totalization Agreements	X		X	X
Transfer Pricing	X	X	X	X
Export Incentives (IC-DISC)	X		X	