



Dank unserer internationalen geographischen Reichweite befasst sich die integrierte Steuerpraxis von Winston & Strawn mit nahezu allen Bereichen des Steuerrechts. Unsere Gruppe aus 40 Steueranwältinnen verfügt über umfassende Erfahrung in der Vertretung einiger der größten nationalen Aktiengesellschaften in der Steuerplanung und strittigen Angelegenheiten. Wir haben erfolgreich Klienten wie Cisco, Nuveen Investments, Yum! Brands, Waste Management, Republic Services, Lear Corporation sowie verschiedene Finanzdienstleistungsunternehmen unterstützt. Wir richten unsere Steuerdienstleistungen eng aus, um die spezifischen geschäftlichen Anforderungen zu erfüllen, indem wir uns mit den Direktkäufern von Finanzdienstleistungen zusammenschließen, vom Vizepräsidenten bis hin zum Finanzchef.

Wir haben uns seit langem im steuerbegünstigten Finanzierungsbereich hervorgetan und unterstützen sowohl Entwickler als auch Kreditgeber. Unsere Anwältinnen für Steuerrecht sind besonders erfahren darin, Klienten bei alternativen Energien und anderen vom Kongress genehmigten Steueranreizprogrammen zu unterstützen. Wir vertreten außerdem zahlreiche Private Equity- und Hedgefonds wie The Jordan Company, Water Street Capital Partners und Monitor-Clipper Partners. Winston verfügt darüber hinaus über signifikante Praxen, die in den Bereichen Bundessteuerplanung, staatliche und kommunale Steuern und Steuertransaktionen tätig sind.

Our tax attorneys regularly partner with regional and international Winston practice areas to offer clients legal counsel in the areas of mergers and acquisitions, investments, and restructurings. Our insurance tax attorneys guide insurance companies through all matters affecting their business and products, including tax planning and analysis related to all issues emanating from; (re)insurance arrangements, mergers and acquisitions, capital market offerings, business restructurings, company formations, and transfer pricing and structuring of offshore insurance operations. Our team also helps clients navigate all stages of the controversy lifecycle, including audits, administrative appeals, and litigation of high-dollar value tax controversies of significant interest for insurance industry clients, at both the state and federal levels.

We have long distinguished ourselves in the tax-advantaged financing area and assist developers as well as lenders. Our tax lawyers have extensive experience helping clients with alternative energy and other Congressionally authorized tax incentive programs. We also possess significant practices in federal tax planning and state and local tax planning.

Working closely with our tax attorneys, Winston's trusts and estates attorneys provide counseling to individuals and corporate fiduciaries regarding estate and tax planning, estate and trust administration, and litigation. We also offer extensive experience in structuring and counseling charitable foundations on tax and corporate issues.

We have successfully assisted clients such as Fage International S.A., Lear Corporation, Nuveen Investments, Inc., Renaissance Technologies, Republic Services, Waste Management, and Yum! Brands. Within the energy industry, we represent EDF Renewable Energy and Invenergy, LLC. We also represent various financial institutions and banks, private equity firms, and hedge funds.

Key Contacts

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[Susan Elizabeth Seabrook](#)

Areas of Focus

Mergers & Acquisitions

Winston & Strawn's transactional practice has substantial experience in structuring taxable and tax-free corporate restructurings, acquisitions and divestitures, as well as partnership and joint venture arrangements for both U.S. and foreign businesses. In addition, our tax attorneys are active in private equity and REIT transactions and often advise clients on the tax consequences related to corporate debt restructuring and other workouts.

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Federal Tax Planning

Winston & Strawn's tax attorneys provide a broad range of tax planning services for the businesses and transactions of our large domestic and foreign-based clients. These clients represent all major sectors of the global economy. Our work in this area includes the development and utilization of tax-advantaged financings and derivative transactions, structuring foreign investment in U.S. real estate, corporate acquisitions, dispositions, joint ventures, and reorganizations; Subpart F issues; international joint ventures and reorganizations; and REITs. We also assist many U.S.-based multinationals in connection with foreign tax credit planning, including the reduction in the effective rate of foreign tax of the foreign members of the group and the utilization of hybrid structures.

Financial Services

Winston & Strawn now has one of the country's leading financial tax practices. We represent major banks from Australia, Canada, France, Germany, Israel, Japan, the United Kingdom, and many other countries in connection with their operations in the United States. We represent significant domestic participants in the financial services industry, including hedge funds and private equity firms. Our team has represented financial firms at all stages of the IRS audit process, including appeals proceedings before the IRS seeking to modify or reverse audit determinations. We have obtained a number of favorable settlements and, in one case, an outright reversal of the IRS's position, enabling our clients to avoid substantial tax assessments without litigation.

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Tax Controversy & Criminal Tax

Our Tax Controversy lawyers advise and represent clients in every aspect of tax investigations and the tax enforcement process. This includes both civil and criminal investigations, from IRS to multi-jurisdictional examinations, alternative dispute resolution including IRS Appeals and Competent Authority, and trial court and appellate litigation in every federal court hearing a tax matter. Our team provides technical expertise and a strategic approach to resolving difficult and sensitive tax matters at the earliest stage possible. Our team has decades of experience successfully resolving domestic and international tax issues for clients and includes former government trial counsel, former government prosecutors, and technical specialists with prior Big Four experience.

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Related Capabilities

Corporate Governance	Private Investment Funds	Mergers & Acquisitions	
Private Equity	International Trade	Securities, M&A & Corporate Governance Litigation	
Tax Controversy & Criminal Tax	Financial Services	Health Care	Insurance

Recent Experience

FAGE International S.A. and FAGE USA Dairy Industry, Inc. Modified Dutch Auction Cash Tender Offer For \$107.5 Million of Senior Notes

Chart Industries Acquisition of Howden

Project Energy Reimagined Acquisition Corp. Closes US\$250M IPO

RLH Equity Partners and the Equityholders of ClearView Healthcare Partners Sale to GHO Capital Partners

Frontenac Co. Sale of Whitebridge Pet Brands to NXMH, a Belgium-based Family-owned Investment Firm

DistributionNow Acquires Flex Flow Business from GR Energy Services

The Care Team's Acquisition of InTeliCare Home Health and Hospice

Resources

[Tax Impacts](#)

Verwandte Einblicke und Nachrichten

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Winston Partners Featured on the *Lawdragon* 500 Leading Global Tax Lawyers List 2025

MAY 19, 2025

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Winston & Strawn Sponsors and Speaks at the Private Equity New York Forum

MAY 14, 2025

RECOGNITIONS

Winston Attorneys Named to *D Magazine's* 2025 Best Lawyers in Dallas List

MAY 6, 2025

CLIENT ALERT

The Path to PISCES - Key Milestones for the UK's First Private Securities Trading System

APRIL 29, 2025

SPEAKING ENGAGEMENT

Angela Russo Speaks at PLI's 2025 Tax Planning for Domestic & Foreign Partnerships, LLCs, Joint Ventures & Other Strategic Alliances Program

APRIL 22, 2025

CLIENT ALERT

Harvard University's Tax-Exempt Status Challenged: What Nonprofits Need to Know

APRIL 22, 2025

BLOG

Tax Controversy and Litigation Series – Look to Cases from 2024

APRIL 21, 2025

RECOGNITIONS

Winston & Strawn Paris Recognized in *The Legal* 500 EMEA 2025

MARCH 26, 2025

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Winston & Strawn Sponsors Nareit's REITwise 2025 Law, Accounting & Finance Conference

MARCH 25, 2025

SPONSORSHIP

Winston & Strawn Sponsors, Partners Speak at SFVegas 2025

FEBRUARY 23, 2025

SPEAKING ENGAGEMENT

Winston Sponsors, Franklin Shen Speaks at ABA 2025 Midyear Tax Meeting

FEBRUARY 19, 2025

BLOG

Micro-Captive Reportable Transactions Regulations Finalized; Challenged

FEBRUARY 4, 2025