Douglas S. Stransky

Partner
Boston

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Practices

- Mergers & Acquisitions
- Tax

About

Doug is the leader of Sullivan's International Tax Practice Group. He concentrates his practice on international tax planning for clients in a wide range of industries with a particular emphasis on U.S.-based clients investing in foreign jurisdictions. Additionally, Doug works with Sullivan's Fintech & Blockchain Group, advising clients on the tax implications of multi-jurisdictional cryptocurrency and fintech-related ventures.

Doug is a former co-chair of the International Tax Committee of the Boston Bar Association, a member of the Board of Advisors for *Practical U.S./International Tax Strategies*, a contributing author for *Lexis Practice Advisor* and a member of the adjunct faculty at Boston University School of Law. Doug is also a frequent speaker at various conferences and webinars on international tax topics for Bloomberg Tax, Financial Executives International, Boston Bar Association and the International Fiscal Association.

Before joining Sullivan, Doug was the Director of International Tax Services and a member of the National Outbound Team at PricewaterhouseCoopers LLP. Previously, he held various management positions in the hospitality industry.

Education

- LL.M., Taxation, University of Miami School of Law
- J.D., *cum laude*, University of Miami School of Law; Projects Editor, *Miami Law Review*
- B.A., *cum laude*, Harvard University

Bar Admissions

- Massachusetts
- U.S. District Court, District of Massachusetts
- U.S. Tax Court

Representative Client Work

- Restructured foreign and domestic businesses in response to the enactment of the

2017 Tax Cuts and Jobs Act

- Structured numerous tax efficient multi-jurisdictional mergers, acquisitions, dispositions and reorganizations for public and private clients in the financial services, life sciences, manufacturing, private equity, technology and venture capital industries
- Designed cross-border financing strategies, including hybrid debt structures, for multiple domestic and foreign acquisitions and restructurings and assisted clients in the recapitalization of foreign operations to reduce foreign tax burdens and enhance foreign earnings repatriation efficiency
- Advised clients on capital loss planning, foreign tax credit utilization, foreign holding company structures, treasury and cash flow management, transfer pricing and migration of intellectual property to tax-favored jurisdictions
- Provided U.S. tax advice to an Israeli-based public company on its $117 million reverse IPO
- Led a worldwide team of attorneys and other advisors to restructure foreign operations in 20 countries for a $2 billion public manufacturing company
- Served as lead counsel for a 10 country reorganization of a public manufacturing company
- Advised U.S. and non-U.S. clients on structuring cross-border real estate investments ranging from $10 million to $600 million
- Represented public and private clients in matters before the U.S. Internal Revenue Service, including controversies, voluntary disclosures related to offshore activities and private letter rulings
- Counseled nonresident families on pre-immigration U.S. tax and estate planning matters

Awards & Recognition

- *Chambers USA,* Ranked in Tax (Massachusetts) (2017-2019)
- *The Legal 500 U.S.* (2014-2019)
- *Best Lawyers in America* (2011-2020)
- Massachusetts *Super Lawyers* (2013, 2016-2019)
- Tax Controversy Leaders' Guide, *International Tax Review* (2011-2014, 2016-2019)
- "Rising Star," Massachusetts *Super Lawyers* (2009-2012)

Professional & Civic Activities

- Lecturer in Law, Boston University School of Law, Graduate Tax Program
- Co-Chair, International Tax Committee, Boston Bar Association, 2009-2011
- Tax Section Steering Committee, Boston Bar Association
- Advisory Board, *Practical U.S./International Tax Strategies*
- International Fiscal Association

- Taxation and International Law Sections, American Bar Association
- Pro Bono Panel, Children's Law Center of Massachusetts

Languages

- Spanish