



Rouzbeh 'Robbie' Alipour

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Robbie advises multinational businesses and globally mobile private clients on U.S. international tax planning, with a focus on structuring inbound and outbound cross-border transactions and investments, as well as overseeing related compliance obligations.

He counsels clients on inbound and outbound tax and wealth planning issues including:

U.S. International Planning for Multinational Businesses

- Designing and implementing tax-efficient U.S. and non-U.S. investment structures.
- Cross-border mergers and acquisitions and internal restructurings.
- Planning and compliance involving Subpart F, GILTI/NCTI, BEAT, FDII, DCL and foreign currency matters.

High-Net-Worth and Entrepreneur Planning and Compliance

- Pre-immigration and expatriation planning.
- Tax treaty-based and FIRPTA structuring.
- Tax compliance and disclosure representation.

Robbie previously served as in-house international tax counsel for major U.S.-based multinational companies, where he worked closely with finance, accounting and executive leadership teams to implement cross-border tax strategies within operating businesses and back-office groups.

Services

- Taxation & Wealth Planning
- International Taxation & Wealth Planning
- Business Taxation

Before Fox Rothschild

Robbie previously practiced at an international law firm and as International Tax Counsel for a Seattle-based technology company and a New York-based global advertising and media company.

Bar Admissions

- Illinois
- New York
- Florida

Education

- New York University School of Law (LL.M. in Taxation)
- University of Florida College of Law (J.D.)
- University of South Florida (M.A.)
 - Economics
- University of Florida (B.S.)
 - Finance