160 Federal Street, 9th Floor Boston, MA 02110

TEL. 617-227-6161 FAX: 617-589-0530

edelsteincpa.com





#### MEET BRAD

Brad focuses on worldwide tax planning and compliance for US-owned foreign businesses as well as for foreign companies and individuals with US activities. He provides comprehensive, value-added services with an emphasis on efficient tax structuring; risk management; and facilitating successful growth for client businesses within the United States and abroad.

Brad's approach is based on a complete understanding of a client's business, the tax and non-tax motivations that drive decision-making processes, effects on financial statements and disclosures, and consideration of the inter-generational implications for both the near and long-term.

With the goal of pursuing a balanced and thorough view of client issues and needs, Brad by necessity also spends a goodly portion of his time being involved with Tax Provisions under ASC 740, and State and Local tax planning and compliance.

Mr. Gold is recognized for his deep technical knowledge and research abilities and is sought out for written memoranda of advice and other similar deliverables. He enjoys sharing his technical knowledge and practical experience and can often be found teaching and mentoring. Brad frequently lectures and trains, both in-house and externally.

Brad addresses multiple issues for clients in a variety of industries, focused primarily in the following areas:

- Inbound and Outbound international tax
- Controlled Foreign Corporations (CFCs) and Controlled Foreign Partnerships (CFCs)
- GILTI and FDII
- Transfer Pricing
- Intellectual Property (Management and Transfers)
- International Boycotts
- Investment in US Real Property (FIRPTA)
- Global Mobility (Expatriates and Foreign Nationals)
- Mergers & Acquisitions
- Consolidated US Corporations
- SALT (Income and Franchise)
- ASC 740 Tax Provisions

160 Federal Street, 9th Floor Boston, MA 02110

TEL. 617-227-6161 FAX: 617-589-0530

edelsteincpa.com



### **BACKGROUND**

Brad began his career at Edelstein & Company after spending the past 35-plus years working in both Public Accounting (Big-four and Local) and the Private Sector.

Mr. Gold has previously been tasked with initializing the tax function for a large, multinational financial institution, as well as internalizing the International Tax Function at a large, local Public Accounting firm.

#### HOW BRAD CAN HELP

- · Minimization of Overall Global Effective Tax Rate
- · Cross-border Entity Structuring and Transactional Analysis
- · Entity Election Planning and Compliance
- Foreign Tax Credit Planning and Utilization
- Form 1120F, including Branch Profits Tax
- Information Reporting (Form 1042 Series)
- US Withholding on ECI and NECI, including the series of Forms W-8 (FATCA compliance)
- FBARs and Reporting other Foreign Financial Assets
- US Residency Certification
- Foreign Country Income Tax Returns and VAT Planning and Compliance
- · Tax Treaty Utilization and Planning
- · Gain Recognition Agreements
- · Repatriation of Earnings and Treasury Management
- Tax Equalizations (designing Programs and related computations)
- · Expatriation Planning around Relinquishing US Citizenship or long-term Residency
- Delinquent International Tax Forms and Disclosures (Streamlined filings and additional Penalty Abatement options)
- State and Local Nexus Studies and Apportionment Planning
- Tax Provision Calculations and Footnote Disclosures

#### **OUTSIDE THE OFFICE**

When Brad isn't serving clients and collaborating with colleagues, he enjoys a serene and simple lifestyle: Spending time with family; nurturing two rescue dogs and a parrot; exploring the wonderful cultural and gastronomical offerings in the great City of Houston; watching professional Hockey and cheering on the Philadelphia Flyers; studying comparative religions and theology; and trying his best to spread joy unto the maximum.

### **EDUCATION**

Master of Science in Taxation, Lubin School of Business at Pace University

Bachelor of Science in Accounting, Brooklyn College of the City University of New York

160 Federal Street, 9th Floor Boston, MA 02110

TEL. 617-227-6161 FAX: 617-589-0530 edelsteincpa.com



# **PROFESSIONAL AFFILIATIONS**

American Institute of Certified Public Accountants (AICPA)

# **COMMUNITY SERVICE**

Assisting with local efforts and activities of various animal Humane Societies.