

## IAN SHANE

### Partner



Ian Shane is a partner in Barton's tax practice. He is a skilled and published U.S. and international corporate tax attorney handling tax planning and structuring. Ian is highly experienced in domestic and cross border transactions, including inbound and out bound, mergers and acquisitions, and general problem solving. Ian advises U.S. companies on international tax planning issues arising from investing overseas, mainly in Europe and Asia. He routinely counsels on choice of entity, check-the-box regulations, as well as cross border financings, transfer pricing, and inbound and outbound asset and stock transfers.

Ian has substantial experience in U.S. federal tax planning and in particular planning with tax treaties, foreign tax credit planning, controlled foreign company issues and issues relating to passive foreign investment companies.

Ian also regularly works on U.S. domestic tax issues including mergers and acquisitions, loss carry overs, elections to treat stock acquisitions as asset acquisitions, tax-free reorganizations, spin-offs and stock redemptions. He advises on tax planning for domestic and international intellectual property assets and structuring corporate debt and equity, including thin capitalization issues.

Ian is a solid resource for tax planning for private equity funds including the use of U.S. listed shell companies. He also handles tax planning for individuals in the entertainment, sports, and fashion industries. For corporations and entities taxed as partnerships, Ian has experience in industries including, finance, airlines, music publishing and streaming, social gaming, hotels and resorts, medical devices, and investor relations.

Ian is dual qualified being a New York attorney and qualified to practice in the United Kingdom.

Prior to joining Barton, Ian was a partner at Michelman & Robinson and was also with DLA Piper, Salans, and Evans Dodd (London Office).

# BARTON

## Contact

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## Education

New York University, Federal Taxation, L.L.M.

University of Westminster, London, B.A. (J.D. equivalent)

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## Admissions

New York State

England (Solicitor)

U.S. Tax Court

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## Practices

Business Transactions

Corporate Formation, Governance, and Compliance

Securities Litigation, Regulatory Investigations, and Enforcement

Tax

## Industry Experience

Advertising, Marketing, and Public Relations

Cannabis

Entertainment

Technology

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## Memberships

American Bar Association

New York City Bar: Committee on Taxation of Business Entities

## Presentations

"Legal Considerations for Doing Business in the US." BritishAmerican Business' Accelerate Program Series. Webinar. (September 30, 2021).

New York State Sales Tax Issues for International Airlines, Airline Financial and Accounting Managers Association (AFAMA) Sales Tax Meeting, New York, New York, October 24, 2019.

The Tax Planning Landscape after the Tax Cuts and Jobs Act - Qualified Opportunity Zones & 199A Planning, PrimeGlobal Annual Tax Conference, Orlando, FL, January 7, 2019.

The Tax Cuts and Jobs Act - BEAT PrimeGlobal Annual Tax Conference, Orlando, FL, January 6, 2019.

The Tax Cuts and Jobs Act : A Look at the International Tax Provisions in the Act, The New York Society of CPA's, New York, NY, January 30, 2018.

Earnings Stripping and the Impact of new US Treasury Department Rules, Transnational Taxation Network's USA Tax Conference, New York, NY, May 2, 2016.