

Joseph Brothers

SENIOR ASSOCIATE | LONDON



JOSEPH.BROTHERS@WITHERSWORLDWIDE.COM



+44 20 7597 6273

CLIENT SERVICES CONTACT GRACE DOODY



GRACE.DOODY@WITHERSWORLDWIDE.COM



+44 20 7597 6867



Joseph Brothers is a senior associate based in London.

Joe is a broad-gauge US tax lawyer whose practice focuses on the US federal tax aspects of private wealth structures, closely held businesses, investment products, and funds. He works closely with his colleagues across the firm's global offices to find and capitalise on cross-border tax planning opportunities.

Joe's practice has a particular focus on inbound US tax planning. This frequently entails advising family offices and trustees based in Europe, Asia, or elsewhere on investments into US private equity, venture capital, credit, and hedge funds.

In addition, Joe regularly solves US tax problems that arise when US residents or citizens hold powers over or economic entitlements in non-US trust structures, including double taxation / treaty issues, general power of appointment risks, and issues relating to the Passive Foreign Investment Company and Controlled Foreign Corporation regimes.

Joe also has broad experience in creating leveraged trusts and other vehicles to mitigate US federal estate tax.

In 2021, Joe was named to eprivateclient's Top 35 Under 35 list of leading young private client practitioners.

Joe has written for leading tax publications such as Tax Notes Federal and Tax Notes International on a variety of US cross-border tax issues.

External publications

"Treaties, Buffet-Style: Highly Selective Reliance On Business Profits Article", Tax Notes International (March 16, 2020)

"Reflections on the Intersection of U.S. Tax Treaty Policy, U.S. Tax Reform, and BEPS," 78 Tax Notes International 759 (with H. David Rosenbloom) (May 25, 2015)

"From the Double Irish to the Bermuda Triangle," 76 Tax Notes International 687 (Nov. 24, 2014)

Admissions

Massachusetts 2015

District of Columbia 2016

Education

Harvard Law School

Duke University, Political Science

Languages

English

Memberships

American Bar Association

Key dates

Year joined: 2018

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