

## Elliot Galler

PARTNER | NEW YORK

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ELLIOT.GALLER@WITHERSWORLDWIDE.COM



+1 212 848 9823

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SECRETARY DENISE GALANTE



DENISE.GALANTE@WITHERSWORLDWIDE.COM



+1 212 848 9865



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### Elliot is a partner in the international corporate tax team.

His practice involves tax planning for both US and international clients investing both in to the US and abroad. He has experience advising multi-national corporations on sophisticated cross-border tax issues as well as high-net worth individuals and families in their personal business endeavors. Examples include domestic and cross-border sales and acquisitions, tax-efficient business and investment structures for a wide range of investments, tax treaty planning, and corporate rationalization matters.

Elliot's client base includes privately-held and publicly-traded companies, high-net worth individuals, and investment funds.

Prior to joining Withers, Elliot spent seven years in the international tax practice at a big four accounting firm.

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## Track record

## Divestment of four business units

Assisted multi-national company divest of four business units across multiple jurisdictions with an emphasis on preserving losses in order to offset future taxable income.

## International real estate venture

Assisted key executive in his investment in an international real estate venture including negotiation of key terms and after tax income stream analysis.

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## Talks

- '[Withers talks: cryptocurrency | Ep 9](#) - tax considerations for crypto investors and issuers,' Withers podcast - May 12, 2021, guest
- '[Checklist 2020: Corporate income tax planning considerations](#),' Withersworldwide webinar - October 28, 2020, co-presenter
- '[Blockchain and the private client](#),' California Lawyers Association webinar - January 9, 2019, speaker
- '[Going for the gold? Adding gold to your asset allocation](#),' Withers event - February 5, 2018, speaker
- '[Trump tax proposal: Breakfast seminar Switzerland](#),' Withers event - June 2017, speaker

## External publications

['IRS enforcement efforts target taxes on cryptocurrency transactions.'](#) Accounting Today, September 9, 2019, co-author

['Cryptocurrencies and the IRS: What you need to know.'](#) Withers Insight, August 06, 2019, co-author

['IRS to Issue Carried Interest Regs Under New Tax Law.'](#) Think Advisor - March 5, 2018, quoted

['Tax New Law Generates an Onslaught.'](#) Of Counsel - February 2018, quoted

['International Withholding Tax- What Fund Lawyers Need to Know.'](#) Lexis Practice Advisor - November 2017, co-author

['Parsing the Future of Tax Reform: A World of Unknowns.'](#) Accounting Today - August 29, 2017

['IRS More Likely To Change Than Ax Debt-Equity Regs.'](#) Law360 - August 10, 2017, quoted

## Admissions

State of New Jersey, 2007

State of New York, 2009

Registered Foreign Lawyer

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## Education

St. John's University School of Law, J.D.

Yeshiva University, Sy Syms School of Business, B.S.

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## Languages

English

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## Memberships

New York State Bar Association

American Bar Association

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## Key dates

Year joined: 2014

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