

# Rahul P. Ranadive

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MIAMI

LOS ANGELES

📞 305.539.7237 📞 310.843.6300

📠 305.530.0055 📠 310.843.6301

CONNECT

✉️ [rranadive@carltonfields.com](mailto:rranadive@carltonfields.com)

🌐 [LinkedIn](#)

## Overview

Rahul Ranadive has almost 25 years of experience advising international high net worth families on global estate and trust planning, private banking, and other personal tax matters. He advises closely held family businesses on a wide range of international and domestic tax and corporate issues. Having been raised in two cultures, Rahul understands the difficulties faced by families spread across multiple jurisdictions as they deal with cross-border succession planning and tax-minimization issues. His background helps him to develop tax plans that achieve efficiency and global tax minimization through bilateral income tax treaties, residency planning, income-sourcing strategies, valuation discounts, and foreign tax credits.

Rahul counsels nonresident individuals and foreign corporations seeking to invest and do business in the United States. His guidance helps them achieve their commercial objectives and overall tax efficiency in both the United States and their home countries. On behalf of foreign investors acquiring U.S. real estate, he crafts tailored investment structures and engages in strategic Foreign Investment in Real Property Tax Act (FIRPTA) planning pre-closing. Rahul is experienced in pre-immigration tax planning, including for investors under various visa categories. He regularly advises foreign lenders and U.S. borrowers on the benefits of portfolio loans and provides complete counseling and drafting services for portfolio loan documentation.

He advises domestic clients on the formation of foreign operations, joint ventures, and mergers and acquisitions; analyzes the impact of local taxes and financial regulations in a given jurisdiction; and advises on the U.S. tax consequences of foreign activities, guiding negotiations where tax questions are paramount. Rahul also has experience with blockchain and digital currency and enjoys examining how traditional tax principles apply to various aspects of new and emerging technologies such as cryptocurrencies and other digital assets, and advising clients on navigating the tax minefield.

In June 2000, Rahul lived out a lifelong dream by appearing on and winning this television game show. What is "Jeopardy!"?

Rahul is an adjunct professor at the University of Miami School of Law, where he teaches graduate courses on a variety of tax issues including tax theory and policy, international corporate taxation, and blockchain and digital assets.

## Areas of Focus

### Practices

- Business Transactions
- International Tax
- Banking, Commercial, and Consumer Finance
- Blockchain and Digital Currency
- Cannabis Law
- Esports and Electronic Gaming
- Estates, Trusts and Probate
- Immigration Planning and Compliance
- International
- International: Asia
- International: Mexico
- International Insurance Regulatory
- Investment and Ownership
- Nonprofit Organizations
- Qualified Opportunity Zone Task Force
- Real Estate
- Tax
- Technology

### Industries

- Banking, Commercial, and Consumer Finance
- Real Estate
- Technology

## Insights

08.03.2021

U.S. Pre-Immigration Tax Planning

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04.03.2020

Immigration and Tax Issues for Nonresident Aliens Subject to Unexpected Travel Restrictions

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07.03.2019

How State Remote Sales and Use Tax Statutes May Impact Crypto Assets

*Bloomberg Law*

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07.03.2019

Impact of New State Sales and Use Tax Laws on Remote Commerce

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04.20.2018

Get Ready: IRS to End OVDP

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03.31.2018

New Tax Law Eliminates 30-Day Safe Harbor Against CFC Status

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01.25.2018

A Day of Reckoning for Recalcitrant Taxpayers?

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11.22.2017

How to Manage Foreign Trusts With U.S. Beneficiaries

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03.01.2012

IRS Reopens Offshore Disclosure Program: Should You Apply?

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04.01.2011

IRS Employs Carrot-And-Stick Approach Against Indian Americans

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05.01.2010

Congress and the IRS Increase Enforcement Efforts Against Taxpayers with Offshore Financial Accounts and Assets

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05.01.2009

Estate Planning During the Recession

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## News

07.03.2019

Carlton Fields Attorneys Author Article Series in Bloomberg Law on State Sales and Use Tax Statutes

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11.02.2018

Carlton Fields Receives Equal Justice Pro Bono Award

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02.15.2018

Seven Carlton Fields Attorneys Elected to Shareholder

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12.19.2017

Bitcoin: If Not HODLing, Consider Donating

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12.07.2017

Carlton Fields Attorney Rahul P. Ranadive Appointed to STEP Miami Branch's Board of Directors

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## Recognition

- Legal Services of Greater Miami's Equal Justice Pro Bono Large Firm Award (2018)

## Professional & Community Involvement

- International Tax Planning Association
- Florida Bar
  - Tax Section
  - International Law Section
- State Bar of California

- California Lawyers Association
  - Taxation Section
- South Asian Bar Association
- Society of Trust and Estate Practitioners

## Speaking Engagements

- "Crypto Assets – U.S. International Taxation Hot Topics," 40th Annual FICPA–Florida Bar Tax Section International Tax Conference, Miami, FL (January 14, 2022)

## Credentials

### Education

- University of Florida Fredric G. Levin College of Law (LL.M., Taxation, 1999)
- Vanderbilt University Law School (J.D., 1996)
- Dartmouth College (A.B., 1990)

### Court Admissions

- U.S. Tax Court

### Bar Admissions

- California
- Florida

### Languages

- Marathi
- Spanish