



Rahul P. Ranadive

SHAREHOLDER

MIAMI

P : 305.539.7237

F : 305.530.0055

LOS ANGELES

P : 310.843.6300

F : 310.843.6301

CONNECT

rranadive@carltonfields.com

[LinkedIn](#)

Overview

Rahul Ranadive has over 20 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. As a member of the firm's Blockchain and Digital Currency Practice, Rahul enjoys examining how traditional tax principles apply to various aspects of new and emerging technologies such as cryptocurrencies and other blockchain applications, and advising clients on navigating the tax minefield.

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

All 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 |
| 07.03.2019 | How State Remote Sales and Use Tax Statutes May Impact Crypto Assets <i>Bloomberg Law</i> |
| 07.03.2019 | Impact of New State Sales and Use Tax Laws on Remote Commerce |
| 04.20.2018 | Get Ready: IRS to End OVDP |
| 03.31.2018 | New Tax Law Eliminates 30-Day Safe Harbor Against CFC Status |
| 01.25.2018 | A Day of Reckoning for Recalcitrant Taxpayers? |
| 11.22.2017 | How to Manage Foreign Trusts With U.S. Beneficiaries |
| 03.01.2012 | IRS Reopens Offshore Disclosure Program: Should You Apply? |
| 03.31.2011 | IRS Employs Carrot-And-Stick Approach Against Indian Americans |
| 04.30.2010 | Congress and the IRS Increase Enforcement Efforts Against Taxpayers with Offshore Financial Accounts and Assets |
| 05.01.2009 | Estate Planning During the Recession |

All News

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| 07.03.2019 | Carlton Fields Attorneys Author Article Series in Bloomberg Law on State Sales and Use Tax Statutes |
| 11.02.2018 | Carlton Fields Receives Equal Justice Pro Bono Award |
| 02.15.2018 | Seven Carlton Fields Attorneys Elected to Shareholder |
| 12.19.2017 | Bitcoin: If Not HODLing, Consider Donating |
| 12.07.2017 | Carlton Fields Attorney Rahul P. Ranadive Appointed to STEP Miami Branch's Board of Directors |

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

Credential

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
- Florida State Courts

BAR ADMISSIONS

- California
- Florida

LANGUAGES

- Marathi
- Spanish

Areas of Focus

PRACTICES

- Blockchain and Digital Currency
- Business Transactions
- Cannabis Law
- Esports and Electronic Gaming
- Estates, Trusts and Probate
- Immigration Planning and Compliance
- International

INDUSTRIES

- Banking, Commercial, and Consumer Finance
- Real Estate

- International: Asia
- International: Mexico
- International Insurance Regulatory
- Investment and Ownership
- Nonprofit Organizations
- Qualified Opportunity Zone Task Force
- Tax
- Technology