



## **Robert J. Misey, Jr.** **Shareholder**

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Robert J. Misey, Jr. is a shareholder in Reinhart's Tax and Corporate Law Practices as well as chair of the firm's International Practice. He serves a wide range of clients involved in an array of industries such as manufacturing, distribution, sport and entertainment with international taxation and tax controversy matters. Licensed in California, Wisconsin, Kentucky and Washington, D.C., Rob is also a member of the International Fiscal Association, chair of the Tax Committee of International Section of the American Bar Association, and a member of Wisconsin Accounting Examining Board.

Prior to establishing a successful nation-wide practice with Reinhart, Rob was an attorney for the IRS where he served as an international tax attorney and trial attorney and learned invaluable inside knowledge that influences him as an attorney today. While in Washington with the IRS, Rob worked on advance pricing agreements and many other transfer pricing matters. His in-depth knowledge and understanding of the entire spectrum of tax and business law allows him to communicate highly complex international tax matters into easily accessible language to any audience.

As a seasoned attorney, Rob offers clients unparalleled legal representation. He also regularly shares his expertise and experience on international taxation with business with national and international professional audiences. He also teaches international taxation at the University of Wisconsin and University of Alabama law schools.

While Rob's credentials are extensive and impressive, clients also appreciate his charismatic personality. Rob is extremely client-friendly, personable yet professional, and his great sense of humor makes working with him an enjoyable experience. In addition to Rob's professional work, he has appeared as an extra in the movies *Forrest Gump*, *Major League 2*, and *When Summer Comes* (ironically, Rob auditioned for the role of an attorney but was told he did not look like an attorney!). He also played a credited role as a prison guard in the movie [A Letter from Death Row](#).

Rob primarily serves clients in the following areas:



- International Tax
- Federal Tax Planning
- Federal Tax Controversies

## Education

- LL.M., with high distinction, Georgetown University Law Center
- J.D., Vanderbilt University Law School
- M.B.A., Vanderbilt University
- B.A., University of Kentucky

## Bar Admissions

California, Wisconsin, Kentucky, Washington D.C.

## Practices

- Tax
- Corporate Law

## Services

- Federal Tax Planning
- International Tax
- Federal Tax Controversy and Litigation
- International
- Advertising, Media and Entertainment

## Matters

- Coordinate with the foreign-owned clients' global tax minimization strategy, using repatriation techniques to minimize U.S. withholding taxes
- Help U.S.-based multinational clients maximize foreign tax credits and avoid U.S. taxation of foreign earnings to reduce the client's overall effective tax rate
- Assist multinational businesses with preparing transfer pricing documentation and negotiating Advance Pricing Agreements (APAs)
- Assist U.S.-based exporters minimize U.S. taxes through the use of IC-DISCs
- Tried 23 cases before the U.S. Tax Court

## Honors & Affiliations

### Honors

- *Best Lawyers in America* (Tax Law)
- Selected for inclusion in *Wisconsin Super Lawyers*
- Martindale-Hubbell AV® Preeminent Peer Review Rated

### Affiliations

- Wisconsin Accounting Examining Board
- American Bar Association - International Tax Committee (Chair)
- District of Columbia Bar Association (Tax Section)
- State Bar of Wisconsin (former Chair of the International Practice Section)
- Milwaukee Bar Association
- American Bar Association
- International Institute (Board member)
- Journal of Tax Practice & Procedure (Advisory Board)

## Presentations

[How to Elect Code Sec. 962 Treatment: New Uses for an Old Tool](#)

## Presentations

- "[Filing Categories For Form 5471: Understanding the Nuances of the Filing Categories](#)," *Taxes - The Tax Magazine* (April 2023)
- "[Controversy over Tax Treaties: More of the Same](#)," *Journal of Tax Practice and Procedure* (April-May 2019)
- "[How to Elect Code Sec. 962 Treatment: New Uses for an Old Tool](#)," *Journal of Tax Practice and Procedure* (March 2019)
- "[Withholding Procedures on the Purchase of a U.S. Partnership Interest](#)," *Journal of Tax Practice & Procedure* (August-September 2018)
- "[Should Taxpayers Translate Documents into English for the IRS?](#)," *Journal of Tax Practice & Procedure* (April-May 2018)

- "[US Tax Issues for Foreign Acquirers of US Companies](#)," *Business Law International* (January 2018)
- "[Preparing the Form 8975 to Defend Transfer Pricing](#)," *Journal of Tax Practice & Procedure* (August-September 2017)
- "[Tax Savings for Architects and Engineers with IC-DISCs](#)," *Taxes - The Tax Magazine* (October 2017)
- "[Brexit Impacts Treaty Benefits Analysis](#)," *Journal of Tax Practice & Procedure* (April-May 2017)
- "[Update on the Central Withholding Agreement Program for Foreign Athletes and Entertainers](#)," *Journal of Tax Practice & Procedure* (December 2016-January 2017)
- "[IC-DISCs: Structuring to Maximize Tax Benefits](#)," *Taxes - The Tax Magazine* (November 2016)
- "[Trump Should Consider Tax Reform by Reducing Regulations](#)," *Milwaukee Journal Sentinel* (February 2017)
- "[The IRS Updates The Advance Pricing Agreement Procedures](#)," *Journal of Tax Practice & Procedure* (June 2016)
- "[IRS Modifies and Clarifies Competent Authority Procedures with Rev. Proc. 2015-40](#)," *Journal of Tax Practice & Procedure* (December 2015-January 2016)
- U.S. Taxation of International Transactions
- International Provisions of the Tax Reform Act of 2004
- Federal Taxation: Practice and Procedure (co-author)
- "[Beyond Information Document Requests: Tools the IRS Uses to Obtain Information from Foreign Countries](#)," *Journal of Tax Practice & Procedure* (May 2014)
- "[Tax-Advantaged Transfer Pricing for Intellectual Property](#)," *Executive Counsel* (December 2013)
- "[How to Achieve Tax Savings on Exported Manufactured Products](#)," *Business Journal-Milwaukee's Mergers and Acquisitions Supplement* (co-author)
- "[An International Tax Review: The U.S.-Based Multinational's Annual Checkup](#)," *Taxes - The Tax Magazine* (2002)
- "[A Primer on Transfer Pricing](#)," *Taxes - The Tax Magazine* (1999)