



Neel Modha

PARTNER

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OFFICE

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PRACTICE AREA & SPECIALIZATION

International Tax

CREDENTIALS AND CERTIFICATIONS

State Bar of New York
State Bar of Connecticut

EDUCATION

LLM, Taxation,
Northwestern University
School of Law
JD, Quinnipiac University
School of Law
BS, Business, University
of Connecticut

Neel has over 15 years of experience in providing international tax consulting and compliance services, serving various clients, including high-net-worth individuals, closely-held business entities and private equity clients across various industries. Neel is experienced in serving US clients with worldwide operations and non-US clients investing and doing business in the US. He has extensive experience in addressing complex international tax issues, including foreign tax credits, subpart F and PFIC planning, FATCA, FIRPTA, tax treaty analysis, foreign currency calculations, export tax incentives, including IC-DISC structuring opportunities, as well as structuring cross-border investments. Neel also has advised on foreign tax credit planning and compliance, and various international tax compliance requirements, including K-2/K-3 reporting, withholding tax reporting, FATCA and CRS due diligence and reporting, foreign asset disclosure requirements, and reporting of foreign corporations, partnerships and disregarded entities.

Neel began his career in public accounting at Deloitte. Neel has an LL.M. in Taxation from Northwestern University School of Law.

Tax Alerts

Guidance for Tax Counsel and New IRS Regulations: Foreign Tax Credit Limitations Under Section 904
August 23, 2019

Foreign Tax Credit Limitations Under Section 904: New IRS Regulations and Guidance for Tax Counsel
May 14, 2019

FATCA, What are the Foreign Account Tax Compliance Requirements? *An Update*
November 11, 2016

Is Implementing an IC-DISC the Right Strategy for Your Export Business?

July 23, 2015