

Paige L. Davis

Shareholder
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Area of Practice

Paige Davis concentrates her practice on cross-border tax and business planning for U.S. and foreign entities. She works with clients to create efficient international investment structures from tax and legal perspectives. She counsels clients on all aspects of transactions, including formation, operation, exit strategies, mergers and acquisitions, financing and other business operations. Her practice also includes tax aspects of aircraft ownership, transactions and financing.

Admitted to Practice

Washington
U.S. Tax Court

Academics

University of Washington (L.L.M., Taxation, 2004)
Lewis and Clark Law School (J.D., 2003)
University of Victoria (B.A., Political Science, 1999)
Harvard University (American Foreign Policy, 1998)

Practice Group and Specialty Team Memberships

Aviation
Business
Canada Practice
Financial Institutions
Long Term Care and Seniors Housing Client Service Team
Mergers and Acquisitions
Tax

Representative Transactions

Provides legal and tax advice on establishing international joint ventures relating to the manufacture and U.S. certification of aircraft parts

Restructure of business operations for U.S. and Italian companies involved in manufacturing and distributing Italian espresso machines

Advises foreign companies on U.S. tax consequences of software sales and licenses

Counsels foreign manufacturing companies on structuring business operations in the U.S.

Regularly works with clients investing and engaging in business operations in Canada and other foreign countries

Provides legal advice to U.S. importers of goods, including plywood and fruit

Represents U.S. aerospace product manufacturer in U.S. and international mergers, acquisitions and dispositions, in addition to other legal and tax advice

Represents clients before the IRS, Washington Department of Revenue and the City of Seattle Department of Finance in federal, state and local tax controversy matters

Represents long term care facilities with Washington business and occupation tax disputes and other state and local tax issues

Provides tax advice to foreign governments and public pension funds investing in the U.S.

Provides business and tax advice to construction industry consultants providing services in the U.S.

Publications

“Can You Handle the Truth About Emerging Trends in Real Estate 2011?” Special Report Analysis by Lane Powell and CB Richard Ellis’ Private Client Group, Co-author (November 15, 2010)

“Investing in Canada Through a U.S. Limited Liability Company: The Impact of New Paragraph 6 to Article IV of the Canada-U.S. Tax Treaty,” ABA Business Law eNewsletter (Summer 2009)

“Accounting for Uncertainty in Income Taxes — The Effect of FASB Interpretation No. 48,” *The Tax Executive* (July-August 2006)

Speaking Engagements

“The Lawyers Toolbox: Tax Issues for Business Transactions,” Washington State Bar Association CLE, Speaker and Chair (December 2009)

U.S.-Canada Income Tax Treaty Update (May 2008)

Oregon-Washington Tax Institute, Co-chair (May 2008)

“The Lawyers Toolbox: Tax Issues for Business Transactions,” Washington State Bar Association CLE, Chair (December 2007)

“Introduction to U.S. International Tax: The Source of Income Rules,” Alliance for Tax, Legal and Accounting Seminars (July 2007)

Awards and Honors

Named as one of *The Best Lawyers in America*®, Tax (2012)

Named as a “Washington Rising Star,” *Super Lawyers* magazine, Taxation (2005, 2009, 2011)

Professional and Community Activities

President, Washington State Bar Association Section of Taxation

Co-chair, Washington State Bar Association Section of Taxation International Tax Committee

Faculty Member, University of Washington, School of Law, Masters in Taxation Program

Pro Bono Attorney for the University of Washington Entrepreneurial Law Clinic

Board Member, On the Boards

Member, Canada-America Society