

## International Tax

Caplin & Drysdale's International Tax practice derives its strength from the technical depth and wide-ranging experience of our attorneys. Our practice is informed by our attorneys' experiences in the IRS, the Department of the Treasury, federal clerkships, the private sector, and their collective decades of client work for multinational corporations, investment funds, foreign governments, private individuals, and others. We continually build on these experiences through collaboration and intellectual engagement within the firm and the broader international tax community by writing on cutting-edge tax topics, speaking at leading industry events, and cultivating relationships with other international tax professionals throughout the world.

### Areas of Focus

#### Cross-Border Business Operations

Businesses with cross-border operations face U.S. tax issues that purely domestic operations do not. The legal form and capital structure of a business play an outsized role in the cross-border context. Caplin & Drysdale attorneys advise a wide variety of businesses on the application of the subpart F, GILTI, FDII, PFIC, BEAT, FIRPTA, and foreign tax credit provisions of U.S. tax law and tax treaties to day-to-day operations. Our International Tax team also advises on U.S. income tax filing obligations, as well as withholding and reporting obligations for cross-border payments or activities.

#### Investments and Operations Abroad

U.S. operating businesses and private equity funds must structure their acquisitions and divestitures of foreign entities, or of U.S. entities with foreign operations, with an eye to the complex rules governing U.S. taxpayers' income from foreign investments and activities. Overseas investment and operations can present opportunities for tax savings through deferral or permanent exemption, but also pitfalls due to the risk of double taxation or the forced recognition of phantom income.

Foreign operating businesses and private equity funds must structure their acquisitions and divestitures of U.S. entities with an understanding of applicable U.S. tax provisions such as debt/equity characterization, limitations on the deductibility of related-party payments, the branch profits tax, FIRPTA, and the withholding rules.

When advising clients on these issues, Caplin & Drysdale brings to bear its considerable experience with U.S. tax treaties and the U.S. taxation of foreign income, as well as its extensive network of relationships with tax advisors throughout the world.

#### International Investments

Individuals investing abroad must be cognizant not only of the complex and often punitive U.S. tax regimes that may apply to such investments, such as the subpart F, GILTI, and PFIC regimes, but also of the U.S. reporting requirements associated with such investments. Investing through common estate planning structures, such as trusts, can add an additional layer of complexity. Caplin & Drysdale attorneys have extensive experience advising clients on such investments, and our International Tax group works closely with the attorneys in the Private Client group to mitigate tax exposure and avoid compliance mistakes that can

result in costly penalties.

### **Cross-Border Real Estate Investment Structures**

Foreign investors in U.S. real estate face potential exposure to U.S. tax, including federal and state income tax and estate tax exposure. Corporate and trust structures can effectively mitigate estate tax exposure, but investors must weigh such benefits against the income tax consequences of these structures, both U.S. and foreign. Caplin & Drysdale has considerable experience advising clients with respect to such structures and working with our Private Client group and foreign tax advisors to optimize global tax exposure from investments in U.S. real estate.

### **Taxation of *Bona Fide* Residents of Puerto Rico, U.S. Virgin Islands, and Other Possessions**

U.S. persons who are *bona fide* residents of U.S. possessions, including Puerto Rico and the U.S. Virgin Islands, are subject to different tax regimes than other U.S. persons with respect to certain types of income. For example, *bona fide* residents of Puerto Rico are exempt from U.S. income taxation on certain income sourced to Puerto Rico, and *bona fide* residents of the U.S. Virgin Islands and other possessions also enjoy certain tax benefits. Special rules under the U.S. tax law define who is a *bona fide* resident of a possession and provide income sourcing rules applicable to such *bona fide* residents. Caplin & Drysdale attorneys has substantial experience advising clients on a wide range of issues under both regimes:

- Whether they are *bona fide* residents of a possession under Treasury Regulations;
- Transfer pricing between possession companies and related U.S. businesses;
- The optimal structure for ownership of and transactions with Puerto Rico Act 60 companies;
- The sourcing of gains from sales of closely held U.S. businesses, including interests in U.S. partnerships, S corporations, and C corporations by *bona fide* residents of a possession;
- The sourcing of investment gains earned by *bona fide* residents of a possession, whether directly or through investment entities;
- The sourcing of stock-based compensation, such as qualified and non-qualified options, warrants, and other interests; and
- Trust and estate planning issues unique to residents of Puerto Rico and other U.S. possessions.

### **Withholding Tax Issues**

From FIRPTA to FATCA, U.S. tax regulations require U.S. and foreign persons to comply with withholding and related documentation requirements in a wide variety of situations. These withholding rules are voluminous and complex, and the consequences for failure to comply with their substantive or procedural requirements may be harsh. Moreover, they cannot be considered in a vacuum; tax treaties and various anti-abuse rules, such as the "conduit" regulations, are also relevant.

For foreign corporations and individuals investing in the United States, as well as U.S. persons making payments to foreign persons, understanding these withholding rules—whether and how they apply, whether and under what circumstances reduced withholding may be available, and what compliance obligations flow from them—is essential. Caplin & Drysdale attorneys are steeped in these rules and in some cases were

involved in writing them. We have hands-on familiarity with all substantive and procedural aspects and regularly assist with:

- Structuring or restructuring U.S. investments to eliminate or minimize withholding tax, and satisfying the associated documentation requirements, such as Forms W-8BEN, W-8BEN-E, W-8IMY, and W-8EXP, non-foreign person certificates, and other certifications; and
- Compliance with U.S. withholding obligations, including those of U.S. partnerships with foreign partners, and limiting exposure to withholding liability.

### **Foreign Tax Credits**

The intricate rules governing foreign tax credits are of fundamental importance for U.S. taxpayers with cross-border operations and income. Caplin & Drysdale attorneys have extensive experience and expertise in navigating these ever-changing rules, including not only basic questions of creditability under U.S. tax law and tax treaties, but also the equally important provisions relating to the foreign tax credit limitation, the deemed paid credit, the requirements for substantiation, and the special currency, accounting, and carryover rules pertaining to the credit.

### **Expert Witness**

Caplin & Drysdale attorneys have served as expert witnesses in more than 40 contentious matters involving international tax issues. These matters have included not only disputes between taxpayers and government entities, but also a variety of private disputes in which aspects of international taxation have been a focus. Although many of these disputes have arisen in state and federal court cases and domestic arbitrations, a substantial number have been in foreign jurisdictions such as Australia, Norway, Canada, and the Netherlands and some have come in international arbitrations under bilateral investment treaties.

### **U.S. Tax Treaty Matters**

Caplin & Drysdale attorneys are called upon daily to interpret and apply tax treaties due to our years of experience structuring cross-border investments, transactions, and operations for clients, participating in the Mutual Agreement Procedure, handling litigation, and representing foreign governments. We are thoroughly familiar with the provisions of most U.S. treaties and have deep knowledge of the histories of most of the treaties in the U.S. network. We also benefit from contacts with a wide network of tax treaty experts throughout the world, with whom we regularly consult.

### **Competent Authority Cases**

Caplin & Drysdale has decades of experience with the Mutual Agreement Procedure (“MAP”) of U.S. tax treaties, in which the competent authorities—that is, representatives of the countries party to the treaty—seek to resolve specific treaty issues. These cases frequently involve disagreements regarding the residence of a taxpayer for treaty purposes, whether a taxpayer resident in one country has a permanent establishment in the other country, and transfer pricing disputes. With the growth in U.S. Advance Pricing Agreements (“APAs”), under which rulings on transfer pricing matters are considered *ex ante* rather than retrospectively on audit, the role of the competent authority has assumed a greater prominence than it used to have. We have shepherded many APAs through the MAP and are familiar with the process. We have also represented taxpayers in non-APA

competent authority cases involving Canada, the United Kingdom, France, Germany, Norway, Japan, Korea, India, Switzerland, Luxembourg, and the Netherlands, to name a few.

### **Advance Pricing Agreements**

Advance Pricing Agreements (“APAs”) can provide an excellent mechanism to resolve cross-border transfer pricing controversies before they occur, on a unilateral, bilateral, or multilateral basis. APAs are often used as a dispute resolution mechanism for contentious big-dollar transfer pricing issues. Caplin & Drysdale has substantial experience helping clients successfully navigate the APA process. Here are some of the ways our attorneys can help:

- Advise on APA experiences in your industry and with your general fact pattern;
- Determine the most appropriate and advantageous transfer pricing methodology;
- Prepare the APA application by identifying, gathering, and synthesizing appropriate historical and financial information;
- Engage an economist, if necessary (under “Kovel”, to best preserve attorney-client privilege), and oversee preparation of the economic analysis;
- Negotiate the terms of the APA with the IRS, in some cases with non-U.S. tax authorities, and help shape Competent Authority negotiations;
- Ensure the documented APA or APAs (if bilateral or multilateral) are consistent with the intended agreement; and
- Support implementation of the APA by providing pre-submission review of APA Annual Reports.

### **Transfer Pricing Issues**

Transfer pricing enforcement is a high-profile, big-dollar audit priority for U.S. and foreign taxing authorities. U.S. tax law gives the IRS broad discretion to reallocate income by challenging transfer prices, and the IRS regularly does so. The IRS also has shown a consistent willingness to litigate big-dollar transfer pricing issues, with material successes in recent years. Caplin & Drysdale’s International Tax team can help by:

- Working with the company and its economic advisors to develop the best defensible method for pricing related-party transactions, including high-value services transactions, services transactions priced under the services cost method, licenses and royalty rates, cost-sharing arrangements, contract manufacturing, at-risk manufacturing, distribution, inventory and other trading, interest rates on loans, and other controlled transactions;
- Preparing or advising on the preparation of transfer pricing planning studies and transfer pricing penalty protection documentation;
- Preparing inter-company agreements that delineate and price related-party transactions, including cost-sharing agreements that meet the requirements of Treasury Regulations;
- Defending the company’s transfer pricing at IRS Examination and Appeals;
- Litigating transfer pricing assessments in various venues, including the United States Tax Court, United States Court of Federal Claims, Federal district courts, and Federal appeals courts;

- Helping clients to avoid double tax by accessing the Competent Authority process, including by seeking mutual agreements and Advance Pricing Agreements; and
- Addressing client concerns in legislative and regulatory processes that relate to transfer pricing.

### **Taxation of Foreign Sovereigns and Pension Funds**

Foreign government investors, including sovereign wealth funds, and foreign public and private pension funds, are among the many investors who seek yield in the U.S. private equity and real estate markets and thereby potentially become subject to U.S. taxation. Certain special exemptions in the U.S. tax law and tax treaties—some longstanding (section 892) and others of more recent vintage (the qualified foreign pension fund (“QFPF”) exemption from FIRPTA)—offer relief.

Structuring into and maintaining qualification for the tax exemptions for foreign sovereigns and pension funds require careful planning and ongoing vigilance. Caplin & Drysdale attorneys have extensive experience working with these rules, having advised clients globally in a wide range of contexts. We regularly:

- Advise foreign sovereign and pension fund clients on their eligibility for exemption under the U.S. tax law and income tax treaties;
- Structure (or restructure) U.S. real estate, infrastructure, private equity and other investments by foreign governments and their controlled entities, to eliminate or minimize withholding tax, and to satisfy the associated documentation requirements;
- Assist clients with real estate and M&A transactions; and
- Support clients in monitoring and managing existing structures to ensure ongoing compliance with the requirements for the foreign sovereign and QFPF exemptions.

### **Taxation of Nonresident Athletes and Entertainers**

Caplin & Drysdale helps professional athletes and entertainers navigate the complex rules that govern their U.S. tax liabilities through planning and dispute resolution, applying the principles of both the U.S. tax laws and applicable tax treaties. We are thoroughly familiar with the growing body of case law and rulings that apply to such persons, who often earn large amounts of income in a relatively short time and who may be compensated not only for their professional services, but also for licensing their names and likenesses. Our team assists these clients in complying with rules requiring that they allocate all their compensation appropriately to the various components—services versus name and likeness, U.S. vs foreign, etc.—and by structuring business arrangements with these issues in mind to minimize the risk of a dispute with the IRS. Our Private Client group provides complementary estate planning services.

### **Related Practices**

Employee Benefits

Private Client

Tax Disputes & Tax Litigation

**News & Insights****NEWS**

Peter Barnes Weighs in on OECD Pillar Two in Law360  
*Law360 Tax Authority*, 06.10.2022

Caplin & Drysdale Attorneys Recognized by Legal 500  
Awards & Rankings | 06.10.2022

*Chambers USA* Recognizes Caplin & Drysdale Attorneys in 2022 Edition  
Awards & Rankings | 06.03.2022

Elizabeth Stevens Comments on Tax Fraud Investigation Against McKinsey in *The Hill*  
*The Hill*, 04.10.2022

Peter Barnes Talks to Bloomberg Tax on Support Need for Global Tax Deal  
*Bloomberg Tax*, 04.08.2022

Caplin & Drysdale Welcomes Nir Fishbien  
03.07.2022

David Rosenbloom Talks to Tax Notes on OECD Pillar Two and BEPS  
*Tax Notes*, 02.18.2022

Law360 Quotes Amanda Leon on FinCEN Regulations  
*Law360 Tax Authority*, 01.28.2022

Victor Jaramillo Talks to Law360 on an International Tax Case To Watch in 2022  
*Law360*, 01.03.2022

Tax Notes Quotes Caplin & Drysdale Alert on FinCEN Proposes Rules  
*Tax Notes*, 12.27.2021

Scott Michel Talks to Bloomberg Law on Offshore Bank Accounts  
*Bloomberg Law*, 12.03.2021

Victor Jaramillo Comments on Recent Government Win on FBAR Penalties in *Bloomberg Law*  
*Bloomberg Law*, 12.02.2021

Law360 Quotes Peter Barnes on OECD Pillar Two  
*Law360 Tax Authority*, 12.01.2021

Duke Celebrates Peter Barnes Becoming International Fiscal Association President  
11.30.2021

Peter Barnes Elected President of International Fiscal Association  
11.29.2021

Clark Armitage Talks to Tax Notes on IRS's New Transfer Pricing Regulatory Projects  
*Tax Notes*, 11.17.2021

Law360 Quotes Peter Barnes on Tax Morality  
*Law360 Tax Authority*, 11.09.2021

David Rosenbloom Comments on Bilateral Investment Treaties in Tax Notes  
*Tax Notes*, 11.08.2021

Super Lawyers® Recognizes Caplin & Drysdale Attorneys in New York  
Awards & Rankings | *Super Lawyers*®, 10.01.2021

Caplin & Drysdale Welcomes Eleanor VanderMeulen  
09.29.2021

Elizabeth Stevens Comments on OECD Pillar One and Two and U.S. Tax Reform in International Tax Review  
*International Tax Review*, 09.20.2021

IBFD Publishes Book Honoring David Rosenbloom's Contributions to International Tax  
09.09.2021

Victor Jaramillo Comments on Cryptocurrency Crackdown in Bloomberg Law  
*Bloomberg Law*, 08.24.2021

Caplin & Drysdale Attorneys Listed as "Best Lawyers In America"  
Awards & Rankings | 08.19.2021

Bloomberg Quotes Elizabeth Stevens on Fee Reimbursement  
*Bloomberg Law*, 08.16.2021

Peter Barnes Weighs in on Digital Taxes and Global Tax Agreements in Bloomberg  
*Bloomberg Law*, 07.21.2021

Peter Barnes Talks to POLITICO on Global Tax Deal  
*POLITICO*, 07.01.2021

Peter Barnes Comments on the Global Tax Fight in POLITICO  
*POLITICO*, 06.30.2021

Legal 500 Recognizes Caplin & Drysdale Attorneys  
Awards & Rankings | 06.10.2021

Clark Armitage Comments on Puerto Rico and New IRS Review in Bloomberg  
*Bloomberg Law*, 06.03.2021

Peter Barnes Weighs in on Indian Software Fee Ruling in Tax Notes  
*Tax Notes*, 05.24.2021

Tax Notes Quotes Clark Armitage on *Coca-Cola* Opinion and DEMPE  
*Tax Notes*, 05.21.2021

PODCAST: Peter Barnes Discusses Global Minimum Corporate Tax on FinReg Pod  
*the FinReg Pod.*, 05.19.2021

Scott Michel Comments on Swiss Life Settlement with DOJ in Tax Notes  
*Tax Notes*, 05.16.2021

Clark Armitage Weighs in on Amazon Case Against European Commission in Tax Notes  
*Tax Notes*, 05.14.2021

David Rosenbloom and Peter Barnes Talk to Law360 on OECD Pillar One and Pillar Two  
*Law360 Tax Authority*, 05.14.2021

Victor Jaramillo Talks to The Independent on Tax Concerns for Prince Harry  
*The Independent*, 05.12.2021

7 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation May Meeting  
04.30.2021

Super Lawyers® Names Caplin & Drysdale Attorneys Among D.C.'s Most Prominent Practitioners  
Awards & Rankings | *Super Lawyers*, 04.29.2021

Elizabeth Stevens Comments on Proposed Changes to GILTI Tax in Law360  
*Law360*, 04.08.2021

Clark Armitage and Dianne Mehany Weigh in on Act 20 and Act 22 Beneficiaries in Puerto Rico  
*The Weekly Journal*, 04.07.2021

New York Times Quotes Peter Barnes on Proposed Tax Changes From Biden Administration  
*New York Times*, 04.05.2021

David Rosenbloom Talks to Tax Notes on Colombia's Tax System  
*Tax Notes*, 03.19.2021

David Rosenbloom Comments on Upcoming Tax Changes Under Biden Administration  
*The Deal Pipeline*, 03.17.2021

Law360 Quotes Elizabeth Stevens on Accounting for the Pandemic's Impact  
*Law360 Tax Authority*, 03.05.2021

Tax Notes Quotes David Rosenbloom on Coca-Cola's Transfer Pricing Dispute  
*Tax Notes*, 02.11.2021

Brazilian Alumni of NYU ITP Publish Book in Honor of David Rosenbloom  
01.30.2021

Elizabeth Stevens Weighs in on IRS Statute on Cross-Border Intercompany Transactions  
*Bloomberg Law*, 01.26.2021

Law360 Quotes Peter Barnes on OECD Digital Tax Plan  
*Law360 Tax Authority*, 12.22.2020

Elizabeth Stevens Comments on Mandatory Binding Arbitration in Tax Notes  
*Tax Notes*, 12.09.2020

UVA Law Interviews Amanda Leon for Tax Law Profile  
*UVA Law*, 12.07.2020

Tax Notes Quotes Clark Armitage on Recent *Coca-Cola* Ruling  
*Tax Notes*, 11.30.2020

Elizabeth Stevens Weighs in on Pandemic Year-End Planning  
*Bloomberg Law*, 11.20.2020

Washingtonian Recognizes Caplin & Drysdale Attorneys Among Washington's Top Lawyers  
Awards & Rankings | *The Washingtonian Magazine*, 11.19.2020

Elizabeth Stevens Comments in Bloomberg on Year-End Tax Guidance  
*Bloomberg Law*, 11.18.2020



Caplin & Drysdale New York Attorneys are Recognized by Super Lawyers® Awards & Rankings | *Super Lawyers*®, 11.06.2020

Law360 Quotes Elizabeth Stevens on COVID-19 Aid and Transfer Pricing  
*Law360 Tax Authority*, 10.22.2020

Bloomberg Quotes Elizabeth Stevens on Partnerships Tax Rules  
*Bloomberg Law*, 10.21.2020

Elizabeth Stevens Weighs in on OECD Updated International Tax Proposal  
*Law360 Tax Authority*, 10.20.2020

David Rosenbloom Comments on Corporate Tax in Corporate Tax Rate Report  
*WalletHub*, 10.14.2020

Elizabeth Stevens and Peter Barnes Speak to Law360 on OECD Guidance on COVID-19  
*Law360 Tax Authority*, 10.02.2020

Caplin & Drysdale Attorneys Receive Award for *Amazon.com v. Commissioner*  
Awards & Rankings | *The ITR Americas Tax Awards*, 09.25.2020

Elizabeth Stevens Speaks to Bloomberg on GILTI and CFCs  
*Bloomberg Law*, 09.02.2020

Caplin & Drysdale Welcomes Heather Schafroth  
09.01.2020

Caplin & Drysdale Earns Top Ranking in 2021 "Best Lawyers in America"  
Awards & Rankings | *U.S. News & World Report*, 08.20.2020

Elizabeth Stevens and Peter Barnes Speak to Law360 on Financial Statements  
*Law360 Tax Authority*, 08.14.2020

Law360 Quotes Elizabeth Stevens on Profit Splitting  
*Law360*, 08.07.2020

David Rosenbloom Speaks to Tax Notes on Cost Sharing  
*Tax Notes*, 07.22.2020

Law360 Quotes Peter Barnes on OECD Leader  
*Law360 Tax Authority*, 07.14.2020

Peter Barnes and Elizabeth Stevens Weigh in on Digital Services Taxes  
*Law360 Tax Authority*, 07.14.2020

17 Caplin & Drysdale Attorneys Recognized in 2020 Legal 500 Ranking  
Awards & Rankings | *The Legal 500*, 07.06.2020

Peter Barnes Comments on Digital Tax Deal in Tax Notes  
*Tax Notes*, 07.02.2020

6 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Virtual May Meeting  
06.29.2020

Elizabeth Stevens Weighs in on BEPS and OECD  
*Tax Notes*, 05.11.2020

David Rosenbloom Comments on Serving as a Clerk to U.S. Supreme Court  
*Super Lawyers*, 05.05.2020

Caplin & Drysdale D.C. Attorneys are Recognized by Super Lawyers®  
Awards & Rankings | *Super Lawyers*, 05.04.2020

Law360 Quotes Elizabeth Stevens on Governments Questioning Losses  
*Law360*, 05.01.2020

Elizabeth Stevens Comments on GILTI and Virus Losses in Law360  
*Law360*, 04.29.2020

New York Times Quotes David Rosenbloom on Recent Repeal of Tax Limitations  
*New York Times*, 04.24.2020

Law360 Quotes Peter Barnes on Adjusting Comparables  
*Law360 Tax Authority*, 04.14.2020

WSJ Quotes David Rosenbloom on International Tax  
*The Wall Street Journal*, 04.09.2020

Law360 Quotes Mark Allison on Foreign Pension Plans  
*Law360*, 03.30.2020

Clark Armitage Weighs in on the Global Tax Regime in POLITICO  
*POLITICO*, 02.22.2020

David Rosenbloom Speaks to Bloomberg on Treasury Fixing Tax Laws  
*Bloomberg Law*, 02.03.2020

David Rosenbloom Comments on GILTI and TCJA  
*Law360 Tax Authority*, 01.27.2020

David Rosenbloom Weighs in on the Use of Data Analytics in Court Cases  
*Tax Notes*, 01.23.2020

New York Times Quotes Clark Armitage on OECD Digital Tax Negotiations  
*New York Times*, 01.23.2020

Clark Armitage Talks to Law360 on International Tax Cases To Watch In 2020  
*Law360*, 01.01.2020

Kirsten Burmester Comments on BEAT in Tax Notes  
*Tax Notes*, 12.09.2019

Law360 Quotes Patricia Lewis and Peter Barnes on U.S. Safe Harbor Proposal  
*Law360*, 12.06.2019

Mark Allison Talks to Tax Notes on IRS Corporate Audit Campaigns  
*Tax Notes*, 10.25.2019

Law360 Quotes Clark Armitage on OECD Global Tax Plan  
*Law360 Tax Authority*, 10.10.2019

Peter Barnes Comments on Sharia Law and Cross-Border Transactions in Islamic Finance News  
*Islamic Finance News*, 10.02.2019

Caplin & Drysdale Announces the Election of Four New Members  
10.01.2019

Elizabeth Stevens Talks to Law360 on OECD Tax Proposals  
*Law360 Tax Authority*, 10.01.2019

Victor Jaramillo Comments on Repatriation Tax in Bloomberg  
*Bloomberg Law*, 09.30.2019

Law360 Quotes David Rosenbloom on Information Sharing  
*Law360*, 09.27.2019

Mark Allison and Aaron Esman Listed Among Top Tax Lawyers in New York Super Lawyers  
*Super Lawyers*, 09.13.2019

Peter Barnes Comments on Sharia Finance Compliance in International Tax Review  
*International Tax Review*, 09.10.2019

Bloomberg Quotes Peter Barnes on Digital Tax Plan  
*Bloomberg Law*, 09.09.2019

Patricia Lewis Talks to Law360 on History of D.C. Women Tax Partners  
*Law360*, 09.02.2019

WSJ Quotes David Rosenbloom: Companies Say They Can Ignore Cost of U.S. Tax Rules  
*The Wall Street Journal*, 08.30.2019

Scott Michel Talks About the State of Offshore Enforcement  
*Law360*, 08.22.2019

David Rosenbloom Comments on Amazon Defeating IRS Over Cost-Sharing Rules in Law360  
*Law360 Tax Authority*, 08.20.2019

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*Law360 Tax Authority*, 08.14.2019

Clark Armitage Comments on MAP Process in Law360  
*Law360 Tax Authority*, 08.08.2019

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*Tax Notes*, 08.06.2019

Niles Elber Comments on Voluntarily Disclosing Tax Violations in Law360  
*Law360 Tax Authority*, 08.05.2019

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*Law360 Tax Authority*, 07.17.2019

Law360 Quotes Elizabeth Stevens on GILTI  
*Law360*, 07.10.2019

David Rosenbloom Speaks to Bloomberg Law on "AbbVie Moves Allergan Profits to U.S. in Partial GOP Tax Law Win"

*Bloomberg Law*, 06.26.2019

David Rosenbloom Speaks to Law360 on "Closing Gaps In GILTI Opens Up Authority Questions"

*Law360*, 06.19.2019

David Rosenbloom Speaks to Bloomberg Law on GILTI

*Bloomberg Law*, 06.17.2019

Mark Allison Speaks to Law360 on "9th Circ.'s Revival of IRS Rules Stretches 'Arm's Length'"

*Law360*, 06.13.2019

The Legal 500 Recognizes 19 Caplin & Drysdale Attorneys

Awards & Rankings | *The Legal 500*, 06.04.2019

Elizabeth Stevens Talks to Bloomberg Law on MAP

*Bloomberg Law*, 06.04.2019

Clark Armitage Comments on Country-by-Country Reporting in Law360

*Law360 Tax Authority*, 05.24.2019

Elizabeth Stevens Comments on U.S. & India APAs

*Law360 Tax Authority*, 05.10.2019

David Rosenbloom Talks to Bloomberg on Trump's Interest Income

*Bloomberg*, 05.08.2019

8 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation May Meeting

05.03.2019

Law360 Quotes Clark Armitage: Debate Over GILTI's Jobs Offshoring Incentive Continues

*Law360 Tax Authority*, 05.03.2019

Peter Barnes Comments on Marketing Intangibles

*Law360 Tax Authority*, 04.29.2019

Law360 Quotes Elizabeth Stevens: Defining Marketing, Trademark IP Could Sink OECD Tax Plan

*Law360 Tax Authority*, 04.29.2019

Super Lawyers® Recognizes 22 Caplin & Drysdale Attorneys in D.C.

Awards & Rankings | *Super Lawyers*, 04.22.2019

Clark Armitage Comments on Advance Pricing Agreements Backlog at IRS

*MLex US Tax Watch*, 04.15.2019

Mark Allison Comments on IRS's Global High Wealth Audits

*ProPublica*, 04.05.2019

Law360 Quotes Peter Barnes on Record Number of U.S. Companies Seeking APAs in 2018

*Law360 Tax Authority*, 03.27.2019

David Rosenbloom Comments on Foreign Tax Credit

*Tax Notes*, 03.25.2019

David Rosenbloom and Clark Armitage Comment on New Restrictions on Tax Carryovers  
*Law360*, 03.22.2019

Law360 Quotes Jonathan Brenner and Peter Barnes: Federal Tax Overhaul Could Keep Homegrown IP in the U.S.  
*Law360*, 03.22.2019

Elizabeth Stevens Comments: U.S. Seeks to Broaden Digital Tax Discussions  
*Law360 Tax Authority*, 03.08.2019

Bloomberg Law Quotes Jonathan Brenner: Companies Get Leniency in Made-in-America Export Tax Break  
*Bloomberg Law, Daily Tax Report*, 03.05.2019

Kirsten Burmester Comments on Impact of Changes in U.S. Tax Law on Treaty Partners  
*Law360 Tax Authority*, 02.22.2019

Tax Notes Quotes David Rosenbloom on Implementing Taxation of Foreign Sales of Partnership Interests  
*Tax Notes*, 02.19.2019

Lexology's Client Choice Recognizes Patricia Lewis for Corporate Tax Legal Services Awards & Rankings | *Lexology's Client Choice™*, 02.07.2019

David Rosenbloom Offers Solution to Conflicting Provisions Under FTC Regs  
*Tax Notes*, 02.04.2019

Law360: Mark Allison Comments on \$2.8B Denmark Refund Case  
*Law360*, 01.10.2019

10 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Midyear Meeting  
01.03.2019

Beth Kaufman Comments on the Year Ahead in Estate Tax Planning  
*Tax Notes*, 12.31.2018

Law360 Quotes Elizabeth Stevens: Lack of Noncash Exceptions in BEAT Rules Has Wide Scope  
*Law360*, 12.18.2018

CBS News Quotes Victor Jaramillo on Writing Off Bitcoin Losses  
*CBS News MoneyWatch*, 12.14.2018

Clark Armitage Comments on BEAT Calculations and Changes in U.S. Transfer Pricing  
*Law360 Tax Authority*, 11.29.2018

Who's Who Legal Selects David Rosenbloom and Christopher Rizek as Leaders in Corporate Tax Awards & Rankings | *Who's Who Legal*, 11.28.2018

Patricia Lewis Talks to Law360: Tariffs Could Throw Advance Pricing Agreements Into Doubt  
*Law360*, 11.19.2018

Law360 Quotes Peter Barnes on Early Test of Digital Tax  
*Law360 Tax Authority*, 11.08.2018

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*Law360 Tax Authority*, 11.02.2018

Peter Barnes Discusses Impact of UK Digital Tax Plan on Silicon Valley  
*Corporate Counsel*, 11.02.2018

David Rosenbloom Talks to POLITICO on UK Digital Services Tax and Its Implications for the U.S.  
*POLITICO*, 11.01.2018

Law360 Comments on Danish Tax Fraud Case Letter from Caplin & Drysdale Attorneys  
*Law360 Tax Authority*, 10.29.2018

Peter Barnes Talks to IRS Official John Hughes on IRS' APA Program Changes  
*Law360 Tax Authority*, 10.25.2018

Bloomberg Quotes Victor Jaramillo on Using Opportunity Zone Funds to Reduce Taxes  
*Bloomberg*, 10.19.2018

Law360's Yvonne Juris Profiles Clark Armitage: Caplin & Drysdale Picks Transfer Pricing Pro As New President  
*Law360 Tax Authority*, 10.17.2018

Transfer Pricing Strategist Clark Armitage Named President of Caplin & Drysdale  
10.11.2018

Accounting Today Quotes Beth Kaufman and Anne O'Brien on IRS Chief Rettig's Potential Response to Trump Tax Investigation  
*Accounting Today*, 10.04.2018

Caplin & Drysdale's Newest Member Victor Jaramillo Serves Tax Controversy Needs of Global Community  
*Caplin & Drysdale*, 10.03.2018

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*Worldwide Tax Daily*, 05.09.2014

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Awards & Rankings | *Expert Guides*, 11.15.2013

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19 Caplin & Drysdale Attorneys Achieve Best Lawyers in America Ranking

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*Bloomberg, Schweizer Fernsehen*, 06.17.2010

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## EVENTS

Elizabeth Stevens Addresses How Teleworking Could Effect Tax Policy at OCED International Tax Conference  
Four Seasons, Washington, D.C., 06.27.2022

Peter Barnes Discusses the White Paper and Transfer Pricing Regulations at NABE Transfer Pricing Symposium  
Four Seasons Hotel, Washington, DC, 07.19.2022

Clark Armitage Explores Best Method Rules at NABE Transfer Pricing Symposium  
Four Seasons Hotel, Washington, DC, 07.21.2022

Amanda Leon Addresses Ethical Issues at IFA USA Branch Annual Conference  
Ritz-Carlton, Washington D.C., 06.03.2022

Elizabeth Stevens Addresses U.S. and International Tax Developments at ITR Women in Tax West Coast Forum  
Sheraton Palo Alto Hotel, 05.24.2022

Peter Barnes Analyzes Pillar Two on IFA Webinar  
05.24.2022

Elizabeth Stevens Discusses Business and Tax Interests in India at Pacific Rim Tax Conference  
Grand Bay San Francisco Hotel, 05.17.2022

Amanda Leon Explores Recent Developments in GloBE & BEPS at Pacific Rim Tax Conference  
Grand Bay San Francisco Hotel, 05.16.2022

Patricia Lewis Explores Mock APA/MAP Case at ABA May Tax Meeting  
Hybrid, Marriott Marquis Washington, DC, 05.12.2022

Elizabeth Stevens Discusses Tax Reform at ITR Women in Tax East Coast Forum  
New York, USA, 05.10.2022

Peter Barnes Explores Impact of Current Global Tax Developments at IFA North American Region Meeting  
JW Marriott Hotel Mexico City, 05.04.2022

Peter Barnes Discusses Future of International Tax Post Pandemic at IFA India Branch International Tax  
Conference

The Lalit Hotel, New Delhi, 04.29.2022

Clark Armitage Explores Global APA Strategy at TP Minds Americas  
Fontainebleau Miami Beach, 04.19.2022

Clark Armitage and Amanda Leon Analyze APAs and MAPs at TP Minds Americas  
Fontainebleau Miami Beach, 04.18.2022

Elizabeth Stevens Co-Chairs Panel on Treaty Policy at ABA Annual U.S. and Europe Tax Practice Trends  
Conference  
Virtual, 04.01.2022

Peter Barnes Co-Chairs Panel on Pillars One and Two at ABA Annual U.S. and Europe Tax Practice Trends  
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Virtual, 03.28.2022

Victor Jaramillo Co-Chairs Panel on Cryptocurrency and NFTs at ABA Annual U.S. and Europe Tax Practice  
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Victor Jaramillo Co-Chairs Panel on Cryptocurrency and Enforcement at ABA Annual U.S. and Europe Tax  
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Virtual, 03.28.2022

Scott Michel Addresses Ethical Issues in International Tax at IFA Winter International Tax Conference  
11:00 AM to 12:20 PM  
12.09.2021

David Rosenbloom Discusses Recent Developments in International Tax at FIT/IBFD International Taxation  
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Scott Michel Discusses Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program  
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Melissa Wiley Moderates Panel on Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program  
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Peter Barnes Moderates Panel on OECD Pillar One and Two at IFA Virtual Congress  
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Victor Jaramillo Addresses Expatriation at U.S. and UK Tax and Estate Planning Conference  
10:00 AM EST  
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Peter Barnes Moderates Panel on Issues Facing Tax Directors at ABA Philadelphia Tax Conference  
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11.09.2021

Victor Jaramillo Addresses IRS Cryptocurrency Enforcement at Latino Tax Fest  
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Victor Jaramillo Addresses in Spanish IRS Cryptocurrency Enforcement at Latino Tax Fest  
12:00 PM to 12:50 PM PST  
09.29.2021

Elizabeth Stevens Discusses Current International Tax Landscape at ITR Women in Tax Forum West Coast 2021  
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Peter Barnes and Lauren Smith Present U.S. Tax Update to Canadian Petroleum Tax Society  
09.09.2021

Clark Armitage Addresses Transfer Pricing and HTVI at Pacific Rim Tax Conference  
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09.09.2021

Elizabeth Stevens Discusses Tax Treaties and Dispute Resolution at PLI Basics of International Taxation 2021  
2:30 PM - 3:45 PM ET  
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Clark Armitage Addresses Economic Implications of Coke Ruling at NABE Transfer Pricing Symposium  
3:15pm - 4:30pm  
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Patricia Lewis Joins ABA Women in Tax Forum Zoom Tea  
4:30 PM ET  
07.16.2021

Clark Armitage Explores Coca-Cola Decision on International Fiscal Association Webinar  
4:15 PM CET  
05.20.2021

Peter Barnes Discusses Cases from Supreme Court of India on International Fiscal Association Webinar  
4:00 PM CET  
05.20.2021

David Rosenbloom and Peter Barnes Join Panel on Evaluating 2017 TCJA and Biden's Newest International Tax Proposals at ABA 2021 May Tax Meeting  
2:30 PM - 4:00 PM ET  
05.14.2021

Elizabeth Stevens Chairs Transfer Pricing Capstone Panel at ABA 2021 May Tax Meeting  
2:30 PM ET  
05.13.2021

Victor Jaramillo Discusses Recent Development in Foreign Financial Reporting and Enforcement at ABA 2021 May Tax Meeting  
2:30 PM ET  
05.11.2021

Elizabeth Stevens Chairs Transfer Pricing Trends Panel at ABA 2021 May Tax Meeting  
12:30 PM ET  
05.10.2021

Elizabeth Stevens Joins Panel on Recent Transfer Pricing and PE Cases at 11th Annual Joint International Tax Conference  
8:30 AM to 10:00 AM ET  
03.31.2021

Elizabeth Stevens Co-Chairs Panel on OECD Pillars at ABA Annual U.S. and Europe Tax Practice Trends Conference

11:00 AM – 12:30 PM ET

03.25.2021

Peter Barnes Analyzes What's Next for OECD Pillars One and Two at TEI Virtual Midyear Conference

11:30 AM to 12:45 PM

03.22.2021

Elizabeth Stevens Explores Recent Developments in Transfer Pricing at FBA Tax Law Conference

11:30 AM to 12:30 PM

03.05.2021

Elizabeth Stevens Discusses Taxation of the Digital Economy at ITR Women in Tax Forum East Coast

9:05 AM to 9:55 AM EST

03.04.2021

Clark Armitage Discusses APA & MAP at TP Minds Canada

4:00 PM

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Elizabeth Stevens Discusses Profit Allocation Within MNEs at University of Lausanne Event

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Amanda Leon Explores Privileges and Penalties at Virtual IFA USA International Tax Conference

11:00 AM - 12:00 PM

12.18.2020

Elizabeth Stevens Addresses Cross-Border Dispute Resolution for 2021 at NYU School of Law Session

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12.08.2020

Clark Armitage Moderates Panel on How the Pandemic Impacts Transfer Pricing in 2021 at NYU School of Law Session

10:00 AM to 11:30 AM

11.24.2020

Elizabeth Stevens Discusses Coronavirus Losses at AICPA & CIMA U.S. Tax Update Conference

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11.23.2020

Elizabeth Stevens Addresses How Multinationals Affect Cross-Border Business at AICPA & CIMA U.S. Tax Update Conference

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Elizabeth Stevens and Josiah Child Analyze GILTI at AICPA & CIMA U.S. Tax Update Conference

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Victor Jaramillo Addresses Reporting Foreign Accounts at Latino Tax Fest

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10.28.2020

Victor Jaramillo Addresses in Spanish Reporting Foreign Accounts at Latino Tax Fest

12:30 PM to 1:30 PM

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Elizabeth Stevens Chairs Developments in Transfer Pricing Panel at ABA Virtual 2020 Fall Tax Meeting

12:30 PM

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Elizabeth Stevens Moderates Panel on Transfer Pricing Developments at ITR Women in Tax Forum Europe

2:50 PM

09.17.2020

Elizabeth Stevens Moderates Panel on Transfer Pricing and U.S. Tax Landscape at TP Minds International

09.03.2020

Victor Jaramillo Addresses in Spanish International Tax Preparation on LatinoTaxPro Webinar

11:30 PM PT

08.06.2020

Victor Jaramillo Explores International Tax Preparation on LatinoTaxPro Webinar

11:30 PM PT

08.04.2020

Elizabeth Stevens Addresses International Tax Structure During COVID-19 on NERA Webinar

11:30 AM

07.29.2020

Elizabeth Stevens Debates the Future of the Arm's Length Standard at 10th Annual NABE Transfer Pricing Symposium

1:00 PM - 2:15 PM

07.22.2020

Elizabeth Stevens Discusses Tax Treaties and Dispute Resolution at PLI Basics of International Taxation 2020

2:30 PM - 3:45 PM

07.22.2020

Clark Armitage Analyzes Transfer Pricing Insurance at 10th Annual NABE Transfer Pricing Symposium

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07.21.2020

Amanda Leon Explores Transfer Pricing Litigation on ABA Virtual 2020 May Tax Meeting

1:00 PM - 2:30 PM

07.02.2020

Peter Barnes Addresses Taxation of the Digital Economy on ABA Virtual 2020 May Tax Meeting

12:00 PM to 1:30 PM

07.01.2020



POSTPONED: Clark Armitage Chairs Working Parties Panel at USD Transfer Pricing Symposium  
Delayed to Fall 2020  
04.02.2020

Elizabeth Stevens Explores Transfer Pricing Concerns at ITR Leading Women in Tax Forum  
9:55 AM  
03.03.2020

Scott Michel Joins Steering Committee for Cambridge Forum on International Tax Disputes  
02.26.2020

Clark Armitage Addresses APA & MAP at TP Minds Americas  
2:30 PM - 3:10 PM  
02.25.2020

Elizabeth Stevens Analyzes OECD Unified Approach at TEI Houston 2020 Tax School  
02.25.2020

Clark Armitage Leads Arbitration in MAP Workshop at TP Minds Americas  
3:00 PM  
02.24.2020

Peter Barnes Discusses OECD Pillars at IFA IV Spanish International Tax Summit  
02.22.2020

Mark Allison Moderates Panel on Foreign Tax Judgments at ABA 2020 Midyear Meeting  
3:20 PM  
01.31.2020

Christopher Rizek Discusses Ethics at 32nd Annual Institute on Current Issues in International Taxation  
10:45 AM - 11:45 AM  
12.20.2019

Kirsten Burmester Analyzes Cross-Border Matters at 32nd Annual Institute on Current Issues in International Taxation  
4:15 PM - 5:00 PM  
12.19.2019

David Rosenbloom Explores Treaty Interpretation After BEPS at Max Planck Institute  
12.19.2019

Kirsten Burmester Discusses BEAT Regulations at D.C. Bar Series  
12:50 PM - 2:00 PM  
12.05.2019

Peter Barnes Analyzes International Tax and Small Business at Research Triangle Foundation  
9:50 AM - 10:30 AM  
11.20.2019

Scott Michel Explores Compliance Obligations With Foreign Investments and Assets at ALI CLE International Trust and Estate Planning Program

3:30 PM

11.15.2019

Victor Jaramillo Co-Chairs Panel at IBA New Era of Taxation Conference

11.07.2019

Clark Armitage Discusses Recent Transfer Pricing Developments at ITR Global Transfer Pricing Forum

09.26.2019

Clark Armitage and Elizabeth Stevens Moderate Panel on Base Erosion and Anti-Abuse Tax at AICPA & CIMA U.S. Tax Update Conference

9:25 AM - 9:50 AM

09.23.2019

Elizabeth Stevens Moderates Panel on FDII at AICPA & CIMA U.S. Tax Update Conference

9:50 AM - 10:40 AM

09.23.2019

Clark Armitage Explores Impact of U.S. Tax Reform on Transfer Pricing at AICPA & CIMA U.S. Tax Update Conference

11:50 AM - 12:40 AM

09.23.2019

Anne O'Brien Presents at Inaugural Mid-Atlantic Fellows Institute  
New York, NY, 09.12.2019

Peter Barnes Addresses Tax and Sharia Instruments at IFA 73rd London Congress

09.09.2019

Victor Jaramillo Discusses Opportunity Zones at Latino Tax Fest

8:00 AM - 9:40 AM

08.01.2019

Kirsten Burmester Analyzes Recent IRS Guidance on BEAT, FDII, GILTI, Captive Services 9th Annual NABE Transfer Pricing Symposium

2:30 PM - 3:30 PM

07.16.2019

Elizabeth Stevens Discusses Transfer Pricing at 9th Annual NABE Transfer Pricing Symposium

07.16.2019

David Rosenbloom and Clark Armitage Discuss Recent International Tax Developments in TCJA at 34th Annual Spring Corporate Tax Day

3:00 PM - 4:00 PM

06.24.2019

Mark Allison Addresses Cross-Border Audits and Investigations at NYU 11th Annual Tax Controversy Forum

4:00 PM - 5:00 PM

06.20.2019

Victor Jaramillo Chairs Digital Economy Roundtable at U.S. and Latin America Tax Practice Trends Conference

9:00 AM - 10:30 AM

06.14.2019

Elizabeth Stevens Explores Improving Tax Certainty at OECD International Tax Conference

9:30 AM to 10:40 AM

06.04.2019

David Rosenbloom Analyzes Global Impact of U.S. Tax Reform

05.22.2019

David Rosenbloom Speaks on International Aspects of New U.S. Tax Legislation

05.21.2019

David Rosenbloom Addresses U.S. Tax Treaty Policy at IFA Lunch & Tax Seminar

05.20.2019

David Rosenbloom Explores U.S. Tax Reform and International Business at International Tax Talks

05.17.2019

David Rosenbloom Lectures on International Tax Law and Digital Economy at University of Milan

05.15.2019

Kirsten Burmester Moderates Panel on Inbound and Outbound Planning After Tax Reform at ABA May Meeting

3:00 PM ET

05.10.2019

Clark Armitage Addresses Transfer Pricing and International Tax Post TCJA and BEPS at Pacific Rim Tax Conference

3:30 PM PT - 5:00 PM PT

05.10.2019

Clark Armitage Chairs Competent Authority Panel at USD Transfer Pricing Symposium

11:00 AM PT

05.09.2019

Peter Barnes Moderates Panel on Right to Tax Digital Services and Goods at ABA Section of International Law Conference

4:30 PM - 6:00 PM

04.11.2019

Scott Michel Co-Chairs Panel on Protecting Taxpayers in an Era of Increased Regulation and Heightened Enforcement at U.S./Europe Tax Conference

2:30 PM - 4:00 PM GMT

04.04.2019

Elizabeth Stevens Examines Transfer Pricing and the U.S. Tax Landscape at TP Minds Conference

5:10 PM - 5:50 PM (London Time)

03.19.2019

Elizabeth Stevens Moderates Panel on What Follows TCJA at FBA Tax Law Conference

11:45 AM - 12:45 PM

03.08.2019

Elizabeth Stevens Chairs International Symposium at FBA Tax Law Conference

03.07.2019

Scott Michel Leads Discussion on "Tax Avoidance v. Tax Evasion" at Cambridge Forum on International Tax Disputes

02.28.2019

Elizabeth Stevens Discusses Alternatives to Resolving Large, Complicated, Corporate Tax Disputes at Women In Tax Forum

11:05 AM ET

02.26.2019

Clark Armitage Discusses Practical APA Experiences at TP Minds Americas

2:00 PM ET - 2:40 PM ET

02.26.2019

Clark Armitage Leads International Tax Workshop at TP Minds Americas

02.25.2019

Kirsten Burmester Explores Importance of Tax Treaties at IFA USA Annual Conference

9:45 AM to 10:45 AM ET

02.22.2019

Christopher Rizek Discusses Ethics at 31st Annual Institute on Current Issues in International Taxation

10:45 AM - 11:45 AM

12.14.2018

Kirsten Burmester Analyzes Cross-Border Matters at 31st Annual Institute on Current Issues in International Taxation

4:45 PM - 5:45 PM

12.13.2018

Kirsten Burmester Moderates Panel on Transfer Pricing Disputes at International Tax Summit

2:20 PM

11.29.2018

Clark Armitage Explores Tax Planning Strategies for Multinational Companies at Bloomberg Tax Leadership Forum

3:10 PM ET

11.29.2018

Kirsten Burmester Examines Nonresident Tax Compliance at MACPA 2018 Advanced Tax Institute Conference

2:45 PM

11.12.2018

Mark Allison Discusses Tax Controversy and Tax Litigation at NYU 77th Institute on Federal Taxation

1:15 PM

11.11.2018

Scott Michel Explores Tax Transparency and Compliance at ALI CLE International Trust and Estate Planning Program

1:30 PM

11.01.2018

David Rosenbloom, Kirsten Burmester, and Elizabeth Stevens Explore Recent International Tax Developments at 49th Annual Fall Tax Day

9:00 AM - 10:55 AM

10.25.2018

Peter Barnes Chairs NFTC Fall Tax Meeting Panel on Mutual Agreement Procedure and Dispute Resolution

10.25.2018

Mark Allison Moderates Panel on Tax Controversy and Tax Litigation at NYU 77th Institute on Federal Taxation

1:15 PM

10.21.2018

Clark Armitage Discusses Dispute Resolution at IICJ New York Conference

11:15 AM

10.16.2018

Victor Jaramillo Moderates Panel on Global Trends in Withholding Taxes at IBA Annual Conference

10.10.2018

Victor Jaramillo Examines Global Trends in Transparency and Disclosure at ABA 2018 Fall Meeting

3:00 PM

10.05.2018

Clark Armitage Explores Audits Under U.S. Tax Reform at AICPA & CIMA U.S. Tax Reform Conference

09.17.2018

Elizabeth Stevens Addresses U.S. Tax Reform at AICPA & CIMA U.S. Tax Reform Conference

09.17.2018

Clark Armitage Moderates Panel on Cross-Border Business at AICPA & CIMA U.S. Tax Reform Conference

11:15 AM

09.17.2018

Peter Barnes and Elizabeth Stevens Chair Tax Incentives Panel at 2018 International Fiscal Association Congress

09.05.2018

Peter Barnes Addresses U.S. Tax Reform at 2018 International Fiscal Association Congress

09.05.2018

Kirsten Burmester Discusses Nonresident Tax Compliance on Strafford Webinar

1:00 PM - 2:30 PM EDT

08.07.2018

Kirsten Burmester Discusses Tax Cuts and Jobs Act at 8th Annual NABE Transfer Pricing Symposium

10:30 AM to 12:00 PM

07.18.2018

Victor Jaramillo Addresses International Tax Planning Incentives at 8th Annual NABE Transfer Pricing Symposium  
8:30 AM to 10:00 AM  
07.18.2018

Mark Matthews Discusses Role of the Press in Tax Cases at NYU 10th Annual Tax Controversy Forum  
11:00 AM  
06.22.2018

Scott Michel Analyzes Unreported Foreign Assets at NYU 10th Annual Tax Controversy Forum  
2:40 PM - 3:40 PM  
06.21.2018

Scott Michel Examines Whether Human Rights Are Affected By Tax Information Reporting and Disclosures at ABA Paris Sessions  
11:00 AM - 12:30 PM  
06.09.2018

Scott Michel Explores Ethical Consideration with International Clients at STEP Miami 9th Annual Summit  
11:50 AM  
06.01.2018

Elizabeth Stevens Explores Tax Reform and Transfer Pricing at D.C. Bar Series  
12:00 PM to 2:00 PM  
05.30.2018

Clark Armitage and Amanda Leon Discuss BEAT, GILTI and FDII at International Monetary Fund Meeting  
05.23.2018

Jonathan Brenner and Elizabeth Stevens Discuss Impact of Tax Reform on Partnerships and LLCs on Strafford Webinar  
1:00 PM - 2:30 PM EDT  
05.16.2018

Niles Elber Explores Title 31 International Penalties at ABA May Meeting  
4:00 PM  
05.11.2018

Elizabeth Stevens Explores CoGS at ABA May Meeting  
12:45 PM  
05.10.2018

Scott Michel Serves as Section Vice Chair at 2018 ABA Section of Taxation May Meeting  
05.10.2018

Clark Armitage Explores Impact of Tax Reform on Puerto Rico at Act 20/22 Society Forum  
05.04.2018

Scott Michel Discusses Ethics in Tax Controversy at TEI Audits & Appeals Seminar  
3:15 PM to 4:30 PM  
05.01.2018

Peter Barnes Analyzes the Morality of International Tax Planning at J. Nelson Young Tax Institute

2:20 PM to 3:20 PM

04.26.2018

David Rosenbloom Discusses Tax Cuts and Jobs Act at 18th Annual NYU/KPMG Tax Symposium

7:00 AM to 7:00 PM

04.25.2018

David Rosenbloom and Clark Armitage Present on GILTI and BEAT at 33rd Annual Spring Tax Day of the Committee of Banking Institutions on Taxation in New York City

3:30 PM - 5:00 PM

04.23.2018

Clark Armitage Discusses IRS APMA Report on ABA Committee Call

04.18.2018

Amanda Leon Speaks on Fundamentals of Tax Litigation at Young Tax Lawyers Symposium

1:00 PM – 2:00 PM

04.13.2018

Mark Allison Discusses Impact of U.S. Tax Reform on Brazilian Individuals, Companies and Investments at Brazilian Tax Conference

10:30 AM

04.12.2018

Elizabeth Stevens Discusses Centralized Partnership Audit Regime at D.C. Bar

12:00 PM to 1:45 PM

04.04.2018

Peter Barnes Discusses Territorial Taxation and Base Erosion at University of Virginia Law School

2:00 PM to 3:30 PM

03.23.2018

Elizabeth Stevens Moderates Panel on How U.S. Tax Reform Will Impact Transfer Pricing Planning at TP Minds International

03.20.2018

Scott Michel Discusses Taking on a Criminal Tax Case at ABA White Collar Crime Conference

10:30 AM

02.28.2018

Peter Barnes Discusses Future of Corporate Tax Departments at 46th Annual Conference of the International Fiscal Association

4:30 PM to 5:30 PM

02.22.2018

Clark Armitage Moderates Panel on How Eaton Decision and U.S. Tax Reform are Affecting APAs at TP Minds Americas

02.20.2018

Clark Armitage Analyzes Transfer Pricing Disputes at TP Minds Americas

02.19.2018

Elizabeth Stevens Discusses Tax Issues Facing Service Members at ABA 2018 Midyear Meeting

3:00 PM

02.09.2018

Clark Armitage and Kirsten Burmester Discuss International Tax Implications of the 2017 Tax Act

01.23.2018

David Rosenbloom Discusses U.S. Tax Reform at University of Padova

4:00 PM

01.12.2018

David Rosenbloom Explores U.S. Tax Reform at Confindustria Vicenza

11:00 AM

01.12.2018

David Rosenbloom Presents on U.S. Tax Reform for Italian Companies Looking to the U.S.

4:30 PM

01.11.2018

Scott Michel Moderates "Representing the Global Citizen" Panel at National Institute Tax Controversy

Conference

12.08.2017

Niles Elber Explores How the IRS is Asserting Penalties at National Institute Tax Controversy Conference

4:30 PM to 5:30 PM

12.07.2017

Kirsten Burmester Discusses Avoiding Foreign Trust Throwback Tax at Strafford Webinar

1:00 PM ET to 2:00 PM ET

11.28.2017

Patricia Lewis Discusses Recent Developments of Transfer Pricing Regimes and Practices at Korean TP Seminar

11.02.2017

Scott Michel Co-Chairs 5th Annual International Tax Enforcement and Controversy Conference

10.27.2017

Clark Armitage Analyzes Transfer Pricing Disputes at 5th Annual International Tax Enforcement and

Controversy Conference

11:15 AM - 12:15 PM

10.27.2017

Scott Michel and Mark Allison Discuss Civil and Criminal Tax at NYU 76th Institute on Federal Taxation

1:15 PM

10.22.2017

Peter Barnes Chairs NFTC Fall Tax Panel on LB&I, Tax Treaties and Transfer Pricing

3:00 PM to 4:30 PM

10.19.2017



Kirsten Burmester Explores Expatriation Planning for the Global Citizen at AICPA Webinar

1:00 PM ET to 2:00 PM ET

09.28.2017

Neal Kochman Discusses Inbound and Outbound Transfer Pricing at Basics of International Taxation 2017 PLI Conference

1:00 PM

09.19.2017

Mark Allison Speaks on How to Conduct Witness Interviews at ABA Joint Fall CLE Meeting

11:30 AM

09.15.2017

Peter Barnes Explores How Tax Changes Will Impact M&A at IFA Symposium

2:30 PM to 4:30 PM

08.29.2017

Jonathan Brenner to Lecture at University of Melbourne on U.S. Income Taxation

July 26th through August 1st

07.26.2017

Patricia Lewis to Discuss Recent U.S. Transfer Pricing Litigation at 7th Annual NABE Transfer Pricing Symposium

8:30 AM to 10:00 AM

07.19.2017

Elizabeth Stevens to Discuss Recent Apple Case at 7th Annual NABE Transfer Pricing Symposium

1:45 PM to 3:15 PM

07.19.2017

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at Basics of International Taxation 2017 PLI Conference

Transfer Pricing- Inbound and Outbound

07.19.2017

Peter Barnes to Speak at International Tax Institute Seminar

12:15 PM to 2:00 PM

07.18.2017

Clark Armitage to Discuss Tax Reform at 7th Annual NABE Transfer Pricing Symposium

1:15 PM - 2:15 PM

07.18.2017

Scott Michel to Moderate International Enforcement Panel at the NYU 10th Annual Tax Controversy Forum

06.15.2017

Clark Armitage to Speak on Dispute Resolution at OECD International Tax Conference

1:30 PM to 2:30 PM

06.06.2017

Kirsten Burmester to Speak on Mastering Form 5472 Webinar Panel

1:00 PM - 2:50 PM ET

05.24.2017

Patricia Lewis on APMA Roundtable Panel at ABA May Meeting

8:30 AM

05.13.2017

David Rosenbloom to Speak on the Impact Brexit Will Have on U.S. Multinationals at 2017 ABA May Meeting

3:00 PM

05.12.2017

Peter Barnes to Discuss Tax Reform at IFA USA Triangle Region Luncheon Seminar

11:30 AM to 1:30 PM

05.08.2017

Peter Barnes to Moderate Panel on GAARs at IFA Asia Pacific Regional Tax Conference

04.29.2017

Peter Barnes to Discuss BEPS Implementation at IFA Asia Pacific Regional Tax Conference

04.29.2017

Peter Barnes to Conduct Workshop at IFA Asia Pacific Regional Tax Conference

04.28.2017

Elizabeth Stevens to Speak on Competent Authority at 5th Annual USD Transfer Pricing Symposium

10:00 AM

04.27.2017

Clark Armitage to Speak on DBCFT at 5th Annual USD Transfer Pricing Symposium

2:45 PM

04.27.2017

Clark Armitage to Discuss Transfer Pricing Controversies at Tax Planning Strategies Conference in Barcelona

11:00 AM to 12:30 PM

04.06.2017

Peter Barnes to Discuss U.S. Tax Reform at IFA Mexico Annual Meeting

04.04.2017

Clark Armitage to Speak on Tax Reform's Impact to Small Business Owners

03.10.2017

Clark Armitage and Kirsten Burmester Speak on Successfully Using APAs at TP Minds Transfer Pricing Summit

Americas

9:00 AM to 11:30 AM

02.23.2017

Clark Armitage to Speak on Transfer Pricing Disputes and ADR Opportunities at TP Minds Transfer Pricing

Summit Americas

02.22.2017

Elizabeth Stevens to Speak on Foreign Tax Credit at ABA Tax Section 2017 Midyear Meeting

8:30 AM

01.20.2017

Arianna Caldwell to Moderate Panel on Subpart F Tax at ABA Tax Section 2017 Midyear Meeting

4:00 PM - 5:00 PM

01.19.2017

Elizabeth Stevens to Moderate Panel on Transfer Pricing Litigation at ABA Tax Section 2017 Midyear Meeting

4:00 PM

01.19.2017

Clark Armitage to Speak on Transfer Pricing Litigation at ABA Tax Section 2017 Midyear Meeting

4:00 PM

01.19.2017

David Rosenbloom to Speak on the Role of "Fairness" in International Tax Policy at GWU-IRS International Tax Conference

8:00 AM - 9:00 AM

12.16.2016

Rachel Partain, Charles Ruchelman, Christopher Rizek, and Mark Allison to Speak on Captive Insurance at Bloomberg BNA Webinar

12:00 PM to 1:00 PM ET

12.09.2016

David Rosenbloom to Speak on Investment and Tax at Resilience Conference Berlin

11.30.2016

David Rosenbloom to Speak on State Aid Controversy at International Tax Institute Seminar

12:15 PM to 2:00 PM

11.17.2016

David Rosenbloom to Speak on International Tax at KPMG Event

12:30 PM - 1:25 PM

11.15.2016

Mark Allison to Speak on Hot Audit/Controversy Issues at NYU 75th Institute on Federal Taxation

11.15.2016

Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation

11.13.2016

Peter Barnes to Speak on BEPS at 27th Annual Philadelphia Tax Conference

8:30 AM - 9:40 AM

11.03.2016

Scott Michel and Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation

10.23.2016

Mark Allison to Speak on Hot Audit/Controversy Issues at NYU 75th Institute on Federal Taxation

10.23.2016

Clark Armitage to Speak on Transfer Pricing at Michigan Law School  
10.13.2016

Peter Barnes to Chair and Speak at 70th Congress of the International Fiscal Association on BEPS  
09.26.2016

David Rosenbloom to Speak on International Tax at 2016 Klaus Vogel Lecture  
09.23.2016

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at PLI Conference  
1:00 PM  
09.20.2016

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at PLI Conference  
1:00 PM  
07.20.2016

Clark Armitage to Speak on Functional Analysis vs. Value Chain Analysis at 6th Annual NABE Transfer Pricing Symposium  
07.20.2016

Patricia Lewis to Speak at 6th Annual NABE Transfer Pricing Symposium  
07.19.2016

Mark Allison to Speak on Collection Due Process Cases at the NYU 8th Annual Tax Controversy Forum  
06.24.2016

Richard Skillman to Speak on Administrative Procedure Act at 6th Annual Global Transfer Pricing Conference  
06.08.2016

Mark Allison to Speak on Partnerships at 2016 Nashville TEI Spring Seminar  
05.05.2016

Clark Armitage and Kirsten Burmester to Speak on Issues Filing Master & Local Files Under Action 13 at TEI 2016 U.S. International Tax Seminar - BEPS is Now  
04.29.2016

Clark Armitage to Speak on New US Transfer Pricing Developments at 4th Annual USD Transfer Pricing Symposium  
04.28.2016

David Rosenbloom to Speak at 2016 NYU/KPMG Tax Lecture  
04.19.2016

David Rosenbloom to Speak on BEPS Project at Sugarman Tax Lecture Hosted by Case Western Reserve University  
03.29.2016

Clark Armitage and Kirsten Burmester to Speak on Mitigating Risk and Disputes Using APAs at TP Minds Transfer Pricing Summit Americas  
02.23.2016

Peter Barnes to Speak at 28th Annual Institute on International Taxation  
12.18.2015

Peter Barnes to Speak at The University of Chicago's Tax Conference  
11.06.2015

Peter Barnes to Speak on Tax Treaty Disputes in China  
10.30.2015

Mark Allison to speak at NYU 74th Institute on Federal Taxation Panel  
10.25.2015

Mark Matthews to Speak on Asset Forfeiture Actions and Money Laundering at Procopio International Tax Institute  
10.23.2015

Clark Armitage to Moderate Government Panel on MAP Issues at National Foreign Trade Council Meeting  
10.22.2015

Mark Matthews to Speak on IRS International Criminal Investigations at Procopio International Tax Institute  
10.22.2015

Mark Allison to Speak on Examinations of TEFRA Partnership  
10.08.2015

Peter Barnes to Speak at Energy Tax Conference  
09.21.2015

David Rosenbloom to Speak on U.S. Tax Developments  
09.18.2015

David Rosenbloom to Speak at BEPS/CTR III Conference  
09.17.2015

David Rosenbloom to Speak at CET Inaugural Conference  
09.17.2015

Scott Michel and David Rosenbloom to Host Panel on 2015 Offshore Enforcement  
09.01.2015

David Rosenbloom to Speak at the Instituto Brasileiro de Direito Tributario  
08.20.2015

Neal Kochman to Speak at Basics of International Taxation Seminar  
07.22.2015

David Rosenbloom to Speak on Tax Treaties  
07.21.2015

Peter Barnes to Speak at 2015 NABE Transfer Pricing Symposium  
07.21.2015

Kirsten Burmester to Speak on Mastering Form 3520 Webinar Panel  
07.16.2015

David Rosenbloom to Speak on the U.S. Reaction to BEPS  
07.02.2015

David Rosenbloom to Speak at Heidelberg University  
07.01.2015

David Rosenbloom to Speak at the University of Würzburg  
06.30.2015

David Rosenbloom to Present Student Lecture at the University of Düsseldorf  
06.25.2015

David Rosenbloom to Speak at the University of Düsseldorf  
06.24.2015

David Rosenbloom to Speak at Max Planck Institute for Tax Law and Public Finance  
06.22.2015

Peter Barnes to Speak on Country-By-Country Reporting Panel  
06.12.2015

Patricia Lewis to Speak at Global Transfer Pricing Conference  
06.12.2015

David Rosenbloom to Speak at Global BEPS Conference  
05.26.2015

Mark Allison to Speak at 2015 Nashville TEI Spring Seminar  
05.20.2015

Mark Allison to Chair Court Procedure and Practice Roundtable Discussion  
05.08.2015

Mark Allison to Speak on Court Procedure and Practice Panel  
05.08.2015

Clark Armitage and Patricia Lewis to Speak at 2015 API Federal Tax Forum  
04.28.2015

Clark Armitage to Moderate Current TP Litigation Panel  
04.23.2015

David Rosenbloom to Speak on 15th Annual Tax Lecture Series  
04.21.2015

David Rosenbloom and Stafford Smiley to Teach LL.M. Program in International Tax Law  
03.20.2015

Patricia Lewis to Moderate a Panel Discussion at the 2015 IFA USA Conference  
02.26.2015

Clark Armitage to Speak on Transfer Pricing Controversy and Alternative Dispute Resolution  
02.25.2015

Clark Armitage to Speak at TP Minds Americas 2015  
02.23.2015

Clark Armitage to Speak at FEI Committee on Taxation Meeting  
02.20.2015

David Rosenbloom to Discuss the Base Erosion and Profit Shifting Project  
02.03.2015

David Rosenbloom and Victor Jaramillo to Speak at the University of Geneva  
02.02.2015

Neal Kochman to Speak on Transfer Pricing Panel  
01.30.2015

Mark Allison to Speak on Court Procedure and Practice Panel  
01.30.2015

David Rosenbloom to Present at the Vienna University of Economics and Business  
01.19.2015

Clark Armitage to Speak at Annual Institute on International Taxation  
12.11.2014

Peter Barnes to Chair Panel on Base Erosion and Profit Shifting  
12.11.2014

David Rosenbloom to Speak at The Instituto Tecnológico Autónomo de México  
11.21.2014

Mark Allison to Speak on Civil & Criminal Tax Controversy Panel  
11.16.2014

Peter Barnes to Speak on Transfer Pricing Panel  
11.13.2014

David Rosenbloom to Speak at Copenhagen Business School's Tax Conference  
11.12.2014

David Rosenbloom to Speak on U.S. Tax Law  
11.12.2014

Clark Armitage to Speak at Georgetown University's Transfer Pricing Symposium  
11.06.2014

David Rosenbloom to Speak on U.S. Taxation of Foreign Corporations Business Profits  
11.05.2014

Mark Allison to Speak at the TEI in Nashville  
10.22.2014

Mark Allison to Speak on Tax Controversy and Litigation Updates  
10.19.2014

Mark Allison to Speak on Tax Court Procedures Panel  
10.17.2014

Peter Barnes to Serve as Chair at IFA Mumbai 2014  
10.14.2014

Scott Michel and David Rosenbloom to Host Panel on 2014 Offshore Enforcement  
10.13.2014

Mark Allison to Chair Court Procedure and Practice Discussion  
09.19.2014

Mark Allison to Speak at 2014 ABA Joint Fall CLE Meeting  
09.19.2014

Patricia Lewis to Moderate Transfer Pricing Panel  
09.19.2014

Clark Armitage to Speak at Duke University's Transfer Pricing Program  
09.18.2014

David Rosenbloom to Speak at First International Tax Forum  
08.22.2014

David Rosenbloom to Speak on International Taxation  
08.22.2014

David Rosenbloom to Speak on Cross-Border Taxation  
08.21.2014

Patricia Lewis to Discuss Transfer Pricing Risks at National Conference  
07.23.2014

Peter Barnes to Speak at International Tax Reform Event  
06.18.2014

Mark Allison to Speak at ABA Program on Attorney-Client Privilege  
06.18.2014

How Many Shades of Grey? Current Ethical Issues for Tax Professionals  
06.11.2014

Peter Barnes to Speak at North American Transfer Pricing Conference  
06.05.2014

Mark Allison to Speak at Tax Executive Institute IRS Audit and Appeals Seminar  
05.22.2014

Mark Allison to Moderate Roundtable Discussion at ABA May Meeting  
05.09.2014

Peter Barnes to Discuss Transfer Pricing Documentation at ABA May Meeting  
05.09.2014

Mark Allison to Chair Court Procedure & Practice Committee  
05.09.2014

Mark Allison to Chair Roundtable Discussion at ABA May Meeting  
05.09.2014

Clark Armitage to Speak at ABA May Meeting  
05.09.2014

Mark Allison to Speak at U.S. Tax Court Program  
05.01.2014



Mark Allison to Speak at Columbia University Undergraduate Law Review Launch Event  
04.30.2014

Clark Armitage and Peter Barnes to Speak at 80th Annual API Federal Tax Forum  
04.28.2014

Clark Armitage to Moderate Panel at Transfer Pricing Symposium  
03.27.2014

Clark Armitage to Discuss APMA Program at International Conference  
03.27.2014

Peter Barnes to Speak at Tax and Corporate Social Responsibility Symposium  
03.25.2014

Peter Barnes to Speak at ABA's International Tax Enforcement Conference  
03.18.2014

Clark Armitage to Moderate APA Panel at 2014 Transfer Pricing Summit  
02.19.2014

Patricia Lewis and Clark Armitage to Moderate APA Workshop at 2014 Transfer Pricing Summit  
02.18.2014

Patricia Lewis Chairs Panel on APMA Revenue Procedures  
02.12.2014

David Rosenbloom to Speak at IFA/CTF Treaty Shopping Conference - Toronto  
02.05.2014

David Rosenbloom to Serve as Guest Speaker for IFA/CTF Conference  
02.05.2014

David Rosenbloom to Speak at IFA/CTF Treaty Shopping Conference - Calgary  
02.03.2014

Peter Barnes to Speak at ABA Midyear Meeting  
01.24.2014

David Rosenbloom to Speak at Legal Affairs Group Luncheon  
01.15.2014

Peter Barnes to Speak at the IRS-GWU International Tax Conference 2013  
12.12.2013

Patricia Lewis to Speak at the IRS-GWU International Tax Conference 2013  
12.12.2013

Peter Barnes to Speak on Transfer Pricings and BEPs at International Tax Conference  
12.07.2013

Peter Barnes to Discuss Managing Global Companies at International Tax Conference  
12.07.2013

Peter Barnes to Speak at the International Tax Conference in Mumbai, India  
12.06.2013

Peter Barnes to Speak at the Tax Academy of Singapore  
11.18.2013

Peter Barnes to Speak at IFA Triangle Luncheon Seminar  
11.12.2013

Peter Barnes to Present at the University of Chicago's 66th Annual Federal Tax Conference  
11.08.2013

Peter Barnes to Speak at NFTC 2013 Fall Meeting of the Tax Committee  
10.30.2013

Stafford Smiley to Speak at Moscow State Law Academy  
10.25.2013

Stafford Smiley Speaks On Tax Reform at the Russian IFA  
10.23.2013

Mark Allison Chairs TEFRA Panel at ABA Meeting  
10.18.2013

Mark Allison Discusses International Tax Best Practices  
10.18.2013

Mark Allison Discusses Tax Shelter Cases  
10.18.2013

Stafford Smiley to Speak at the 2nd Annual Conference of the Moscow State Institute for Law  
10.17.2013

Mark Allison to Speak at the International Forum of Administration and Tax Justice  
09.26.2013

Stafford Smiley to Speak at American Chamber of Commerce in Poland  
09.20.2013

Mark Allison to Speak on Monthly Conference Call for ABA Tax Administrative Practice Committee  
Subcommittee on IRS Liaison Activities  
09.18.2013

Scott Michel and David Rosenbloom to Speak at IFA Copenhagen 2013  
08.26.2013

H. David Rosenbloom Presents Lecture Series in Italy  
05.06.2013

Clark Armitage Discusses Transfer Pricing Developments  
05.01.2013

David Rosenbloom Speaks at Tax Lecture Series on Tax Planning for U.S Inbound Investment  
04.18.2013

Patricia Lewis to Chair Panel at 37th Annual Tax Law Conference  
03.01.2013

Clark Armitage to Cover Transfer Pricing at International Conference  
03.01.2013

H. David Rosenbloom to Appear before the Standing Committee on Finance  
02.07.2013

Richard Skillman to Speak on Ponzi Scheme Panel  
01.26.2013

Mark Allison to Speak at ABA Tax Section Meeting in Orlando  
01.25.2013

Niles Elber, Matthew Hicks, and Michael Pfeifer to Present Program to Mid-Atlantic STEP Members  
12.03.2012

H. David Rosenbloom to Speak at the Wall Street Tax Association  
11.26.2012

Scott D. Michel & H. David Rosenbloom to Speak at ABA Section of Taxation's Conference on International Tax Enforcement  
11.08.2012

H. David Rosenbloom to Speak at Mumbai Law Firm  
10.30.2012

H. David Rosenbloom to Speak at NYU-ACTL US International Taxation Conference: Issues For The Years Ahead  
10.23.2012

H. David Rosenbloom to Speak at Vienna University of Economics and Business Tax Governance Conference  
09.20.2012

Patricia G. Lewis to Chair Panel at National Association for Business Economics Transfer Pricing Symposium  
07.31.2012

Patricia G. Lewis to Speak at IFA Roundtable Discussion with IRS National Director of Transfer Pricing Operations  
07.25.2012

H. David Rosenbloom to Chair the NYU School of Law and the Amsterdam Centre for Tax Law Conference FATCA From a US and EU Perspective  
06.21.2012

Patricia G. Lewis to Speak at the 2012 OECD International Tax Conference  
06.04.2012

Mark Allison to Speak on Motions in Limine  
05.11.2012

Mark Allison to Speak on Federal Tax Disputes  
05.01.2012

Mark Allison to Moderate Parallel Civil Tax Litigation and Criminal Investigations Panel  
02.17.2012

Clark Armitage Discusses Cost Sharing at D.C. Bar Program  
02.01.2012

H. David Rosenbloom Speaks About The Vodafone Decision Impact on US-India Investment Strategies in NYC  
01.25.2012

Mark Allison Discusses Tax Litigation Trends  
01.19.2012

Kirsten Burmester to Discuss International Civil and Criminal Penalties at DC Bar Program  
01.03.2012

Patricia Lewis to Chair Panel on Transfer Pricing Enforcement  
12.15.2011

Scott Michel to Speak at UCLA's 27th Annual Tax Controversy Institute  
UCLA Tax Controversy Institute  
10.25.2011

Scott Michel to Speak on Panel at UCLA Tax Controversy Institute  
UCLA Tax Controversy Institute  
10.25.2011

FBAR for the Fiduciary  
10.18.2011

Stafford Smiley to Speak on The Foreign Account Tax Compliance Act (FATCA)  
10.11.2011

Clark Armitage to Speak at D.C. Bar Program on Transfer Pricing  
09.01.2011

International Tax Policy: A Current View from the United States  
Melbourne Law School's 2011 Annual Tax Lecture  
08.03.2011

Clark Armitage to Speak on APA Issues  
08.01.2011

Circular 230 Important Revisions  
02.23.2011

Mark Allison Moderates Panel on Material Advisor Litigation  
01.21.2011

Mark Allison to Speak on Section 6700 Litigation  
01.21.2011

David Rosenbloom to Speak on Competent Authority Panel  
12.09.2010

Richard Skillman to Speak on Executive Compensation  
11.18.2010

David Rosenbloom to Speak on The UBS Saga  
11.18.2010

Changing Supervisory and Regulatory Landscape  
4th Annual Hedge Fund General Counsel Summit  
10.04.2010

Tax in the Spotlight: Governments and Tax Directors under Pressure  
EMEA Tax Summit, Prague, Czech Republic  
09.29.2010

Taxation and Human Rights in Europe and the World  
The 5th GREIT Conference, Badia Fiesolana (Florence), Italy  
09.16.2010

13th Annual Advanced ALI-ABA Course of Study for Counselors to Foreign and U.S. Clients  
American Law Institute - American Bar Association  
08.19.2010

The Foreign Account Tax Compliance Act in 2010 Explored  
08.05.2010

Patricia Lewis to Discuss APAs at National Conference  
06.21.2010

Clark Armitage Discusses Dispute Resolution  
04.01.2010

International Tax Issues Facing U.S. Taxpayers With Foreign Accounts and Their Financial Institutions  
National University of Singapore  
03.18.2010

David Rosenbloom to Speak at 34th Annual Tax Law Conference  
03.05.2010

Clark Armitage Speaks on the APA Process  
03.01.2010

Mark Allison Discusses Tax Court Procedures at ABA Conference  
01.11.2010

Scott Michel and Cono Namorato to Speak at The 26th Annual National Institute on Criminal Tax Fraud  
12.03.2009

Brave New World of Tax Enforcement: UBS, International and Corporate Criminal Tax Issues  
White Collar Practice Seminar - Pennsylvania Association of Criminal Defense Lawyers  
11.13.2009

Clark Armitage Covers Competent Authority at Canadian Conference  
11.01.2009

Voluntary Disclosures: Still Possible After UBS?  
UCLA's 25th Annual Tax Controversy Institute  
10.27.2009

School of Law 2009 Procopio International Tax Institute  
University of San Diego School of Law  
10.19.2009

Patricia Lewis to Discuss Korea's Approach to APAs  
10.15.2009

Latest International Tax Developments and News from Washington, D.C.  
Society of Trust & Estate Practitioners (STEP) Miami  
09.23.2009

21st Annual International Trust & Tax Planning Summit  
International Trust & Tax Planning Summit  
09.23.2009

Mark Allison Chairs Statute of Limitations Panel  
09.10.2009

Undeclared Foreign Accounts, Trusts and Estates: Implications of IRS Enforcement Actions  
07.16.2009

Clark Armitage Discusses APA and Competent at Training Program  
07.01.2009

Mark Allison Chairs Transferee Liability Panel at ABA Conference  
01.10.2009

Mark Allison Discusses Jury Trials at ABA Event  
09.10.2008

The Current State of Expatriation  
PLI: International Tax & Estate Planning 2008  
New York, NY, 06.03.2008

Taxation of Artists and Sportsmen  
University of Geneva, Faculty of Law  
Geneva, 10.11.2007

Mark Allison Talks Cross-Border Discovery at ABA Program  
09.10.2007

Cross-Border Tax Arbitrage: The Good, The Bad and The Ugly  
The 59th Annual Federal Tax Conference of the University of Chicago Law School  
The Gleacher Center; Chicago, IL, 11.10.2006

Mark Allison Speaks on Section 162(f) at TEI Conference  
10.24.2006

Mark Allison Discusses Tax Shelter Litigation Trends at ABA Program  
02.10.2006

Mark Allison Speaks on Expert Witnesses at ABA Conference  
09.10.2004

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Article | *Financier Worldwide*, 04.28.2022

VIEWPOINT: The Branch Rule: An Unhurried Read of the Statute

Article | *Tax Notes International*, 04.04.2022

Ready or Not, It's Time for Transparency *FinCEN Proposes Rules to Implement Beneficial Ownership Reporting Requirements*

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Wouldn't It Be Nice: Reimagining US Taxation of Outbound Investment

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The Morality – or Immorality – of International Tax Planning

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IRS "Dirty Dozen" List Includes "Potentially" Abusive Use of U.S.-Malta Tax Treaty in Pension Plans

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VIEWPOINT: The Future of Transfer Pricing

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Yellen's Global Minimum Tax Push Likely to Crash and Burn

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Reverse Claw-Backs Revisited: IRS Issues Post-*Altera* Guidance on Adjustments for Stock-Based Compensation Costs and Cost Sharing Arrangements

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Biden's Proposed Tax Increases – How Do they Affect Bona Fide Residents of Puerto Rico?

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Is an Act 60 Taxpayer Required to Have a Transfer Pricing Study?

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"Cui Bono Fuisset": Coordinating U.S. Tax Statutes with U.S. Tax Treaties

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IRS to "Campaign" into Puerto Rico; How can Taxpayers Defend?

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Coke Concentrate: A Recipe for Understanding the IRS's Biggest Win in 40 Years

Article | *IBFD International Transfer Pricing Journal*, 01.28.2021

The *Adams Challenge* Tax Court Decision Reinforces the Benefits of Foreign Taxpayers Filing Protective U.S. Returns

Tax Alert | 01.26.2021

INSIGHT: The 2020 Revision to the Internal Revenue Manual's Voluntary Disclosure Practice: More Consistency with Greater Risk

Article | *Bloomberg Tax: Daily Tax Report*, 01.12.2021

IRS Wins Big in *The Coca-Cola Company & Subs. v. Commissioner*

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Article | *Financier Worldwide*, 10.05.2020

IRS Kicks Off Post-*Altera* Audit Adjustments

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CFCs and the Individual Shareholder

Article | *Tax Notes International*, 09.14.2020

Treasury Finalizes GILTI High-Tax Exclusion Rules

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Final FDII/GILTI Regulations Withdraw Deduction Ordering Rule

Business, Investment & Transactional Tax Alert | 07.20.2020

FDII Documentation Requirements Relaxed

International Tax Alert | 07.20.2020

A Seat at the Table: Thought Leaders Discuss OECD's Plans on Digital Economy Taxation

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COVID-19 and Tax Law: A Current View from the United States

Article | *Belt and Road Initiative Tax Journal*, 06.03.2020

TAX PRACTICE: A Silver Linings Guidebook: Corporate Planning for Coronavirus Losses

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CARES Act Offers Income Tax Relief for Business

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VIEWPOINT: Digital Services Taxes: How Did We Get Into This Mess?

Article | *Tax Notes Federal*, 03.23.2020

VIEWPOINT: The U.S. Foreign Tax Credit Limitation: How It Works, Why It Matters

Article | *Tax Notes Federal*, 03.09.2020

The OECD Unified Approach Marches (Stumbles?) Forward

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Interpreting the TCJA: Standing Up (With Reservations) for Treasury

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Go BIG! How to Build a Tax Effort Worthy of the Belt and Road Initiative  
Article | *Journal of International Taxation in China*, 12.11.2019

OECD Announces a Public Consultation for Global Minimum Tax Rules  
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U.S. Tax Policy and Cross-Border Investments in 2019: The General Picture  
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An OECD "Unified Approach" to Addressing the Challenges of the Digital Economy  
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Sharia Law Is Already Here - The IRS Must Respond  
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The Proposed GILTI High Tax Exclusion  
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Combating Aggressive Tax Planning Through Disclosure: A Comparison of U.S. and EU Rules Applicable to Tax Advisors  
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Article | *IFA India Newsletter*, 01.01.2019

Proposed Regulations Under Section 956  
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Navigating QBAI Quirks of the GILTI Regulations  
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EXPERT ANALYSIS: U.S. Owners of Foreign Trusts Face Increased IRS Scrutiny  
Article | *Law360*, 06.21.2018

IRS Adds Foreign Trust Information Reporting to Compliance Campaign Program  
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Mining for Meaning: An Examination of the Legality of Property Rights in Space Resources  
*Virginia Law Review*, 05.01.2018

INSIGHT: Last Call for OVDP: Use It or Lose It  
Article | *Bloomberg Tax: Daily Tax Report*, 04.20.2018

INSIGHT: BEAT Strikes the Wrong Note  
Article | *Bloomberg Tax: Daily Tax Report*, 03.16.2018

IRS's Offshore Voluntary Disclosure Program Ending: Impact on U.S. Taxpayers  
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GILTI Pleasures  
Article | *Tax Notes International Magazine*, 02.12.2018

IRS to Revoke Passports for Seriously Delinquent Tax Debts Starting February 2018  
Tax Alert | 02.12.2018

United Nations Handbook on Selected Issues in Protecting the Tax Base of Developing Countries - Chapter IV:  
Limiting Interest Deductions  
Article | *United Nations*, 01.22.2018

U.S. Plays Lone Ranger on International Tax to Its Detriment  
Article | *The Hill Op-Ed*, 01.19.2018

New Partnership Audit Rules Go Live  
Tax Alert | 01.09.2018

International Aspects of U.S. 'Tax Reform' -- Is This Really Where We Want to Go?  
Article | *International Tax Report*, 01.02.2018

Tax Reform May Make Payment of Nonbusiness Tax Advice Fees Non-Deductible  
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David Rosenbloom Comments on Tax Bills' Impact on Earnings of U.S.-Owned Foreign Corporations  
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Possible Tax Fallout for Student and Professional Athletes from NCAA-Related Investigations  
Tax Alert | 11.09.2017

Paradise Papers: U.S. Citizens and Residents Required to Report on Offshore Assets  
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Different Viewpoint Not a Misrepresentation: Tax Court Holds IRS Abused Its Discretion in Cancelling Eaton's APAs  
International Tax Alert | 08.24.2017

BEPS: The Corporate Tax Leader's Perspective  
Article | *International Bureau of Fiscal Documentation (IBFD)*, 07.01.2017

Foreword for Asian Voices: BEPS and Beyond  
Article | *International Bureau of Fiscal Documentation (IBFD)*, 07.01.2017

U.S. Corporate Tax Reform and Wallace Stevens  
Article | *Tax Notes*, 05.30.2017

The Destination-Based Cash Flow Tax Is a VAT?  
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*Bloomberg BNA*, 03.17.2017

U.S. Corporate Tax Reform and Jean-Paul Sartre

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Will Border Adjustment Tax End Transfer Pricing as We Know It?

*Bloomberg BNA, Tax Management Transfer Pricing Report*, 02.23.2017

Where Have All the Transfer Pricing Safe Harbors Gone? A Plea for Reinvigoration

*Bloomberg BNA, Tax Management Transfer Pricing Report*, 02.23.2017

IRS Launches Issue Based Corporate Compliance Campaigns

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Reconsidering European Court of Justice Jurisprudence on Limitation on Benefits Clauses: Why the U.S. Should Care

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IRS Launches 13 Issue-Based Corporate Compliance Campaigns

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The U.S. Must Avoid This Untested Approach To International Taxes

*The Hill Op-Ed*, 01.24.2017

Tax Plans Compared (December 2016) Corporate Tax

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Treasury Issues Final Regulations to Address Use of U.S. LLCs to Disguise Beneficial Ownership

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Financier Worldwide Annual Review: Transfer Pricing 2016 – United States

Article | *Financier Worldwide*, 11.16.2016

New Regulations Change Allocation of Partnership Liabilities

Article | *International Law Office*, 11.04.2016

Captive Insurance: New IRS Tax Reporting Regime Potential for Penalties and Examinations

Tax Alert | 11.03.2016

New Regulations Change Allocation of Partnership Liabilities

Article | *Global Tax Weekly*, 11.03.2016

The U.S. Country-by-Country Reporting Regulations: A Synopsis

*Global Taxation*, 10.01.2016

U.S. Tax Enforcers React to The Panama Papers

*IFC Review*, 09.01.2016

Muhammad Ali in the Time of the 'Maxi Tax'

Article | *Tax Notes*, 08.08.2016

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Article | *Financier Worldwide*, 04.27.2016

Treasury Announces Regulations to Address Use of U.S. LLCs to Disguise Beneficial Ownership  
Tax Alert | 04.05.2016

Coca-Cola Company Challenges \$9 Billion Transfer Pricing Adjustment  
Article | *International Law Office*, 02.05.2016

Is It the Real Thing? The IRS Makes \$9+ Billion of Transfer Pricing Adjustments Against The Coca-Cola Company  
International Tax Alert | 12.23.2015

Congress Enacts Entirely New Tax Examination and Collection Regime for Partnerships  
Tax Alert | 12.10.2015

Derivative Benefits and Equivalent Beneficiaries - What Are We Talking About? Part II  
Article | *International Tax Report*, 12.10.2015

Steps Foreign Persons Can Take to Avoid Unnecessary U.S. Estate Tax  
Private Client Alert | 11.09.2015

Derivative Benefits and Equivalent Beneficiaries - What Are We Talking About? Part I  
Article | *International Tax Report*, 11.05.2015

The Final OECD BEPS Tome Has Arrived  
International Tax Alert | 10.08.2015

Strategic Resets Under the New MAP and APA Revenue Procedures  
International Tax Alert | 09.23.2015

Transfer Pricing Audits: Flipping the Tested Party  
Article | *International Law Office*, 08.28.2015

Transfer Pricing Audits: Flipping the Tested Party  
Article | *Wolters Kluwer*, 08.27.2015

IRS Releases Guidelines for Examining CFC Transactions  
Article | *International Law Office*, 08.21.2015

Transfer Pricing Audits: Flipping the Tested Party  
International Tax Alert | 08.13.2015

IRS Releases Guidelines for Examining CFC Transactions  
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The Intersection of U.S. Tax Treaty Policy, Tax Reform, and BEPS  
Article | *International Law Office*, 07.24.2015

*Moore* Requires 'More' Scrutiny of IRS-Imposed FBAR Penalties Under the Administrative Procedures Act  
Article | *Family Office Elite Magazine*, 07.17.2015

FATCA – Enforcement Win or Expatriate Generator?  
Article | *IFC Review*, 07.01.2015

Treasury Proposes Significant Changes to Model Tax Treaty  
Article | *International Law Office*, 06.12.2015

Treasury Proposes Significant Changes to U.S. Model Treaty  
Article | *Global Tax Weekly*, 06.04.2015

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International Tax Alert | 05.26.2015

Reflections on the Intersection of U.S. Tax Treaty Policy, U.S. Tax Reform, and BEPS  
Article | *Tax Notes International*, 05.25.2015

The Tax Planner's Tightrope: Morality and Politics Now in Play  
Article | *IFC Economic Report*, 05.05.2015

Abusive Small Captive Insurance Companies on IRS 'Dirty Dozen' List  
Article | *International Law Office*, 02.27.2015

Abusive Small Captive Insurance Companies Added to IRS "Dirty Dozen Tax Scams"  
Tax Alert | 02.13.2015

Proposed New York Tax Changes Would Affect Large and Small Businesses  
Article | *International Law Office*, 01.30.2015

Switzerland Narrows Advance Notice to Account Holders of Treaty Requests: Americans with Unreported Accounts Impacted  
Tax Alert | 12.16.2014

Will the Rush to Invert Spur Corporate Tax Reform? A Conversation  
Article | *Tax Notes International*, 12.15.2014

OECD Releases Finalized Proposals on Key Tax Base Erosion Concerns  
Article | *Global Tax Weekly*, 11.06.2014

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IRS Issues Final Regulations On Material Advisor Penalties  
Article | *Global Tax Weekly*, 09.04.2014

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Article | *International Law Office*, 08.29.2014

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Remain Vigilant On Indian Permanent Establishments, Even After the Favorable e-Funds Decision  
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OECD's Proposed New Approach to Transfer Pricing of Intangibles: A Critique  
Article | *New York University*, 06.29.2014

Remain Vigilant on Indian Permanent Establishments, Even After the Favorable e-Funds Decision  
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The New APMA Procedures — Cosmetic or Cosmic?  
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Bold Shift in IRS Approach to Transfer Pricing Controversies  
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- Surprise! Your Foreign Tax Credit Is Not Allowed Under Section 901(I)  
Article | *Tax Notes International*, 01.14.2014
- Overview of the OECD'S Action Plan on Base Erosion and Profit Shifting  
Article | *Corporate Taxation*, 11.01.2013
- DOJ Deal with Swiss Banks Impacts U.S. Taxpayers and Financial Firms Around the World  
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- Me, Myself, and My Subsidiary: A Shift in the Intent Standard in Related-Party Hybrid Debt Cases  
Article | *Corporate Taxation*, 09.01.2013
- Amazon.com v. Commissioner: Veritas Redux?*  
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- Global Netting: Potential Opportunities for Corporate Taxpayers  
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- Global Netting: Potential Opportunities for Corporate Taxpayers  
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- Professional Golfer Sergio Garcia to Owe More Taxes on Endorsement Income  
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- Cruising Toward Safe Harbors for Transfer Pricing?  
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- Transfer Pricing: Rules and Practice in Selected Countries (H-1), No. 6955  
Article | *Bloomberg BNA Tax Management Portfolio*, 01.01.2013
- Safe at Last? Transfer Pricing Safe Harbors on the Horizon  
Article | *Bloomberg BNA*, 09.06.2012
- What You Really Need to Know About Transfer Pricing  
*The Metropolitan Corporate Counsel, Inc.*, 07.01.2012
- Article from Tax Analysts, Switzerland and the U.S.: What We Have Here is a Failure to Communicate  
*Tax Analysts*, by H. David Rosenbloom, 06.04.2012
- Foreign Tax Credit Generators  
*Corporate Taxation*, 05.01.2012
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Article | *Practical Law Company*, 04.26.2012
- Case Updates-Dell Products (Norway) General Electric Capital (Canada) SNF (Australia)  
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- Before It's Too Late: Reconsidering The IRS Relief for Madoff Losses  
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Taxation of Passive Foreign Investment Companies: Current Rules, Problems and Possible Solutions

Article | *Corporate Taxation*, 11.01.2011

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India's Proposed Direct Taxes Code - Highlights For Corporate Taxpayers

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An Overview of the Foreign Account Tax Compliance Act

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