

## 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 Comments on Pillar One and Digital Services Taxes

*Foreign Policy*, 11.30.2022

Elizabeth Stevens Weighs in on OECD Plan to Simplify Transfer Pricing Disputes in Bloomberg Tax

*Bloomberg Tax*, 11.25.2022

Elizabeth Stevens Discusses Transfer Pricing Mentorship Program on Tax Notes Talk Podcast

*Tax Notes Talk*, 11.04.2022

David Rosenbloom Comments on Tax Shelters in Daily Beast

*The Daily Beast*, 09.29.2022

Elizabeth Stevens Spoke to Bloomberg Tax for Transfer Pricing Chat Series

*Bloomberg Tax*, 09.26.2022

Caplin & Drysdale Welcomes New Associate Arjun Ghosh

09.19.2022

Law360 Quotes Peter Barnes on GILTI and Pillar Two

*Law360 Tax Authority*, 09.16.2022

Peter Barnes Weighs in on New Corporate Minimum Tax Law

*Protocol*, 08.19.2022

“Best Lawyers in America” Names Caplin & Drysdale Attorneys as Leaders in Their Field

Awards & Rankings | 08.18.2022

Law360 Quotes Elizabeth Stevens on Pillar One and DSTs

*Law360 Tax Authority*, 08.10.2022

Peter Barnes Talks to Financial Times on Biden’s Tax Proposals and OECD Pillar Two

*Financial Times*, 08.09.2022

Caplin & Drysdale Welcomes New Associate Molefi McIntosh

08.02.2022

Bloomberg Tax Quotes Peter Barnes on Yellen's Global Tax Plan

*Bloomberg Tax*, 07.29.2022

Peter Barnes Comments on OECD Pillar Two and the European Union in Law360

*Law360 Tax Authority*, 07.20.2022

Law360 Quotes Elizabeth Stevens on How Global Telework Could Change International Tax Policy

*Law360 Tax Authority*, 07.01.2022

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

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

Law360 Quotes Peter Barnes on OECD Leader  
*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

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

Caplin & Drysdale Announces the Election of Four New Members  
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

Caplin & Drysdale Attorneys Listed as "Best Lawyers In America"  
Awards & Rankings | 08.15.2019

Law360 Quotes Patricia Lewis on Transfer Pricing Safe Harbors  
*Law360 Tax Authority*, 08.14.2019

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

Tax Notes Quotes Clark Armitage on Stock-Based Compensation  
*Tax Notes*, 08.06.2019

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

Law360 Quotes Peter Barnes on New International Tax System  
*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

Law360 Quotes Elizabeth Stevens: Defining Marketing, Trademark IP Could Sink OECD Tax Plan  
*Law360 Tax Authority*, 04.29.2019

Peter Barnes Comments on Marketing Intangibles  
*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

Peter Barnes and David Rosenbloom Comment on IRS Transfer Pricing Tool  
*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

7 Caplin & Drysdale Attorneys Contribute to ABA's Annual Section of Taxation Fall Meeting  
*Caplin & Drysdale*, 10.02.2018

David Rosenbloom Talks to Law360 on Transfer Pricing Issues to be Explored at ABA Conference  
*Law360*, 10.02.2018

Scott Michel Discusses Offshore Voluntary Disclosure Program Shutdown with Law360  
*Law360*, 09.28.2018

Mark Allison Talks to Law360 on Transfer Pricing Cases That May Impact Altera Rehearing  
*Law360*, 09.28.2018

Law360 Quotes Patricia Lewis on IRS Revamp of APA Program  
*Law360*, 09.25.2018

Law360 Quotes Clark Armitage on GILTI Glitch  
*Law360*, 09.19.2018

David Rosenbloom Talks to Law360 on Proposed GILTI Regs' Anti-Abuse Rule Seen As Overly Broad  
*Law360*, 09.17.2018

New York Super Lawyers Lists Tax Attorneys Mark Allison and Aaron Esman for 2018 Awards & Rankings | *Super Lawyers*®, 09.14.2018

Peter Barnes Speaks to Law360 on IRS Audit Program for Large Companies  
*Law360*, 08.31.2018

Scott Michel Talks to Tax Notes on Nominee to Head IRS  
*Tax Notes*, 08.28.2018

Worldwide Tax Daily Quotes David Rosenbloom: BEAT Conflict Clouds Future of Pending Tax Treaties  
*Tax Notes*, 08.27.2018

Bloomberg BNA Quotes Patricia Lewis: 4 Things to Know About the IRS's Intercompany Pricing Deals  
*Bloomberg BNA*, 08.27.2018

Worldwide Tax Daily Quotes Clark Armitage: Exempts Score Win with GILTI Unrelated Business Income Exclusion  
*Tax Notes*, 08.22.2018

Caplin & Drysdale Improves Ranking in 2019 "Best Lawyers in America" Awards & Rankings | 08.15.2018

POLITICO Quotes Scott Michel on Manafort Criminal Tax Charges  
*POLITICO*, 08.15.2018

David Rosenbloom Talks to Law360: Altera Withdrawal Highlights Warring Transfer Pricing Rules  
*Law360*, 08.15.2018

Caplin & Drysdale International Tax Controversy Team Receives ABA Pro Bono Award  
Both | *Caplin & Drysdale, Chartered*, 08.02.2018

Law360 Quotes Peter Barnes: IRS Floats Rules for Transition Tax on Foreign Earnings  
*Law360*, 08.01.2018

Peter Barnes Talks to Law360 on Multinationals' Data Paints Global Picture, But Has Limits  
*Law360*, 07.27.2018

Mark Allison Speaks to Law360: 9th Circuit's Shift from Arm's-Length Rule May Embolden IRS  
*Law360*, 07.24.2018

Bloomberg Law Quotes David Rosenbloom: Tax Loophole Could Let Wealthy Tap 21% Corporate Rate  
*Bloomberg Law, Daily Tax Report: International*, 07.12.2018

David Rosenbloom Named to *The Legal 500's* Hall of Fame  
Awards & Rankings | *The Legal 500*, 07.10.2018

David Rosenbloom and Elizabeth Stevens Submit Amicus Brief to Uphold Decision Favoring Amazon in IRS  
Transfer Pricing Dispute  
*Law360*, 07.09.2018

Peter Barnes Comments on OECD Super Treaty with Bloomberg BNA  
*Bloomberg BNA*, 07.06.2018

Law360 Quotes Elizabeth Stevens on BEAT Policies to Look Out For Later This Year  
*Law360*, 07.05.2018

Peter Barnes Talks to Bloomberg BNA: New Taxation Threshold 'No Golden Goose' for Countries  
*Bloomberg BNA*, 06.29.2018

Bloomberg Law Quotes Peter Barnes: OECD Super Treaty Enters Into Force July 1  
*Bloomberg Law, Daily Tax Report: International*, 06.28.2018

Wall Street Journal Quotes David Rosenbloom: Companies Hope to Beat a New Tax Called the BEAT  
*The Wall Street Journal*, 06.26.2018

David Rosenbloom Discusses with Tax Notes One Reason Congress Should Revisit the BEAT  
*Tax Notes*, 06.18.2018

Law360 Quotes Patricia Lewis: IRS 'Reference Set' Library Could Speed Up Transfer Pricing Cases  
*Law360*, 06.18.2018

Clark Armitage Comments on GILTI and Subpart F  
*MLex US Tax Watch*, 06.08.2018

Law360 Quotes Clark Armitage: Tax Laws' Avoidance Rules Could Entangle Foreign Deals  
*Law360*, 06.04.2018



2018 Legal 500 Distinguishes 18 Caplin & Drysdale Attorneys, Firm Renews "Top-Tier Firm" Ranking for Tax Controversy

Awards & Rankings | *The Legal 500*, 05.31.2018

Tax Notes Quotes David Rosenbloom on Tax Reform Open Questions

*Tax Notes*, 05.29.2018

U.S. News Quotes Elizabeth Stevens on How Changes to BEAT Could Impact Cost of Goods Sold

*U.S. News & World Report*, 05.25.2018

Clark Armitage Speaks to Law360 on 5 Ways TCJA Could Play Out for Multinational Companies

*Law360*, 05.18.2018

Niles Elber and Victor Jaramillo Talk to Law360 on Offshore Voluntary Disclosure Program Ending

*Law360*, 05.14.2018

Peter Barnes Comments on Foreign Tax Credit Issues in Law360

*Law360*, 05.09.2018

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

*Caplin & Drysdale*, 05.09.2018

David Rosenbloom Quoted by Tax Notes on the Conflict Between GILTI and U.S. Tax Treaties

*Tax Notes*, 05.07.2018

18 Caplin & Drysdale Attorneys Recognized by Super Lawyers in D.C.

04.23.2018

Elizabeth Stevens Discusses Further Clarification on BEAT Rule with Bloomberg

*Bloomberg BNA*, 04.16.2018

Law360 Quotes David Rosenbloom on TCJA and Inversions

*Law360*, 04.16.2018

Scott Michel Talks to Law360 on IRS Replacing Offshore Voluntary Disclosure Program

*Law360*, 04.10.2018

Peter Barnes Discusses Increase in Closed IRS Advance Pricing Agreements with Law360

*Law360*, 04.09.2018

Law360 Quotes Peter Barnes on Challenges to Quebec Digital Tax

*Law360*, 04.09.2018

David Rosenbloom Responds to Tax Reform Q&A

*WalletHub.com*, 03.28.2018

Peter Barnes Talks to Law360: OECD Profit Attribution Guidelines for Multinational Companies

*Law360*, 03.23.2018

Scott Michel Comments on Closure of IRS Offshore Voluntary Disclosure Program

*MLex US Tax Watch*, 03.23.2018

Caplin & Drysdale Welcomes Steven Hannes to Its International Tax Group

*Caplin & Drysdale*, 03.05.2018

Anne O'Brien and Clark Armitage Listed Among Top 30 U.S. Lawyers by Euromoney Awards & Rankings | *Euromoney Expert Guides*, 03.02.2018

Scott Michel Comments on Charles Rettig, Nominee to Head IRS  
*MLex US Tax Watch*, 03.02.2018

Peter Barnes Comments on BEAT Provision in Law360  
*Law360*, 02.22.2018

Scott Michel Comments on Charles Rettig's Nomination for IRS Commissioner  
*Tax Notes*, 02.09.2018

Law360 Quotes Peter Barnes and Kirsten Burmester: Applying Foreign Tax Credit To Repatriation A Daunting Task  
*Law360*, 01.30.2018

David Rosenbloom's Article Cited on International Tax Portal  
*TaxIndiaInternational.com*, 01.27.2018

Peter Barnes Authors Chapter in United Nations Handbook, Selected Issues in Protecting the Tax Base of Developing Countries  
*Tax Notes*, 01.22.2018

Law360 Quotes Clark Armitage: Cos. Should Consider Foreign Response To US Tax Reform, 2018 Law360 17-143  
*Law360*, 01.17.2018

Peter Barnes and David Rosenbloom Discuss New Tax Law Undermining Treaties and International Policy  
*Law360*, 01.09.2018

Law360 Speaks to Elizabeth Stevens About Retiring Tax Court Judge Robert Wherry  
*Law360*, 01.05.2018

Law360 Talks to Clark Armitage, Peter Barnes, and Elizabeth Stevens on International Tax Cases to Watch in 2018  
*Law360*, 01.02.2018

Peter Barnes and David Rosenbloom Discuss Impact of New International Tax System with Law360  
*Law360*, 01.01.2018

How Will Businesses and Individuals be Impacted by Tax Reform?  
*Caplin & Drysdale, Chartered*, 01.01.2018

Law360 Speaks with Peter Barnes on Whether Companies Will Bring Intellectual Property and Its Revenue Back to the U.S.  
*Law360*, 12.22.2017

Wall Street Journal Quotes James Salles and Richard Skillman on AT&T Corporate Tax Savings  
*The Wall Street Journal*, 12.21.2017

Law360 Speaks with Mark Allison on Tax Bill's Effect on Corporate Tax Planning  
*Law360*, 12.21.2017

BBC News Quotes David Rosenbloom on Trump's Tax Plans Impact on International Tax  
*BBC News*, 12.18.2017

David Rosenbloom Comments: Legislation Raises Tax Treaty Concerns for U.S. Multinationals  
*Daily Tax Report*, 12.14.2017

Caplin & Drysdale Tax Lawyers Work with Croatian Ministry of Finance on Tax Enforcement Issues  
12.11.2017

Law360 Quotes Peter Barnes and David Rosenbloom on International Interest Deductions in Tax Bill  
*Law360*, 12.07.2017

New York Times Quotes Scott Michel on Tax Plan's Ambiguity  
*The New York Times*, 12.05.2017

MEDIA ADVISORY: Will the IRS Know What Gifts Prince Harry Gives Meghan Markle for Christmas?  
*Caplin & Drysdale, Chartered*, 11.30.2017

Law360 Quotes Scott Michel: 'Willfulness' in Civil FBAR Cases Comes Down to the Facts  
*Law360*, 11.21.2017

Law360 Quotes Peter Barnes and David Rosenbloom: Foreign Credits At Risk in Senate Tax Bill, Analysts Say  
*Law360*, 11.16.2017

Washington Post Quotes David Rosenbloom on Americans with Offshore Interests  
*The Washington Post*, 11.14.2017

Law360 Quotes David Rosenbloom on Threat to 20% Corporate Tax Rate  
*Law360*, 11.08.2017

David Rosenbloom Discusses Impact of Cutting Corporate Tax Rate  
*The Christian Science Monitor*, 11.08.2017

David Rosenbloom Comments on Offshore Tax Havens  
*Daily Tax Report*, 11.05.2017

Law360 Quotes Peter Barnes on 25% Corporate Tax Rate Proposal  
*Law360*, 10.26.2017

Tax Notes Quotes 3 Caplin Tax Controversy Attorneys on the IRS's Aggressive FBAR Enforcement  
*Tax Notes*, 10.19.2017

David Rosenbloom Comments on Proposed Tax Cuts  
*TheStreet.com*, 09.29.2017

David Rosenbloom Discusses "Corporate Integration" Plan with Law360  
*Law360*, 09.19.2017

David Rosenbloom Comments: Delays Fuel Speculation About Regulatory Future  
*Tax Notes*, 08.22.2017

Caplin & Drysdale Earns Top Ranking in 2018 "Best Lawyers in America"  
Awards & Rankings | 08.15.2017

Peter Barnes Comments on "Permanent Establishment" in Formula One Cases  
*Tax Notes*, 07.31.2017

David Rosenbloom Comments on Alternatives to BAT  
*Forbes*, 07.28.2017

7 Caplin & Drysdale Lawyers Listed as Leaders in Their Field by Expert Guides Awards & Rankings | *Expert Guides*, 07.25.2017

Bloomberg BNA Quotes Patricia Lewis: Safe Harbors for Cost Sharing a Lesson from Amazon *Bloomberg BNA*, 07.21.2017

New York Times Quotes Jonathan Brenner on Hedge-Fund Managers' Looming Tax Bills *The New York Times*, 07.21.2017

WSJ Quotes Jonathan Brenner: Hedge-Fund Managers Prepare Huge Tax Checks *The Wall Street Journal*, 07.20.2017

David Rosenbloom Comments on Trump's Proposed 15% Corporate Tax Rate *Bloomberg Law*, 06.27.2017

Caplin & Drysdale Lawyers Improve Their 2017 Chambers' Rankings Awards & Rankings | *Chambers USA*, 06.02.2017

18 Caplin & Drysdale Lawyers Recognized in 2017 Legal 500 Ranking Awards & Rankings | *The Legal 500*, 06.02.2017

David Rosenbloom Offers Analysis of Republican Party's Tax Reform Proposal *FiscoOggi*, 05.31.2017

Patricia Lewis Discusses Advance Pricing Agreements with Bloomberg BNA *Bloomberg BNA*, 05.16.2017

David Rosenbloom Discusses Corporate Repatriation of Profits with Tax Notes *Tax Notes*, 05.12.2017

Clark Armitage Speaks to Bloomberg BNA on Tax Overhaul's Impact on IRS Multinational Agreements *Bloomberg BNA*, 05.01.2017

Caplin & Drysdale Lawyers Listed Among D.C.'s Most Prominent Practitioners Awards & Rankings | *Super Lawyers*, 04.27.2017

BNA Quotes David Rosenbloom: GOP Plan to Bring Back Offshore Cash May Cause Headaches *Bloomberg BNA*, 04.19.2017

Tax Notes Quotes David Rosenbloom: Challenging Outbound Transfers of Intangibles *Tax Notes*, 04.17.2017

Tax Notes Quotes David Rosenbloom: States Consciously Uncoupling From the Cash Flow Tax? *Tax Notes*, 04.10.2017

Arielle Borsos and Charles Ruchelman Comment on Dutch Request for John Doe Summonses *Tax Notes*, 04.06.2017

Tax Notes Quotes David Rosenbloom: The Hexagon of Tax Reform *Tax Notes*, 04.05.2017

Law360 Quotes Mark Allison on Transfer Pricing Cases After Amazon Loss *Law360*, 03.24.2017

Daily Tax Report Quotes Peter Barnes: Reporting Form Gives IRS Auditors New Lens for U.S. Groups *Daily Tax Report*, 03.08.2017

Peter Barnes Talks to Bloomberg Law on Will Border-Adjusted Tax Halt Inversions?

*Tax Notes International*, 02.27.2017

Clark Armitage Speaks to Bloomberg BNA: Services a Possible Sticking Point in GOP Cash Flow Tax Plan

*Bloomberg BNA*, 02.23.2017

Clark Armitage Speaks to Bloomberg BNA: GOP Tax Overhaul Could Throw U.S. Tax Treaties into Question

*Bloomberg BNA*, 02.03.2017

Clark Armitage Speaks to Law360: GOP Tax Plan May Increase Transfer Pricing Scrutiny Abroad

*Law360*, 01.27.2017

Tax Notes Discusses Multinationals with Peter Barnes

*Tax Notes International*, 01.03.2017

Bloomberg TV Interviews David Rosenbloom: Apple Challenges EU Tax Bill: Do They Have a Case?

*Bloomberg Technology*, 12.19.2016

BNA Quotes Peter Barnes: Tax Rate Competition Part of New Reality

*Bloomberg BNA*, 12.13.2016

David Rosenbloom Comments on Crackdown on Corporate Tax Avoidance

*Law360*, 12.09.2016

Bloomberg Politics Quotes Peter Barnes: Koch Industries Says House GOP's Tax Plan 'Could Be Devastating'

*Bloomberg Politics*, 12.09.2016

David Rosenbloom Comments on Americans Paying Apple Millions to Shelter Overseas Profits

*WealthManagement.com*, 12.07.2016

BNA Quotes Peter Barnes: Why Are Taxpayers Winning on Transfer Pricing in IRS Appeals?

*Bloomberg BNA*, 12.02.2016

David Rosenbloom Comments on EU Tax Probes Prompting Questions About Risk

*Tax Management Transfer Pricing Report™*, 11.17.2016

Peter Barnes Comments: U.S. Role in Global Tax Rewrite Uncertain After Trump Win

*Bloomberg Law's International Tax Monitor™*, 11.10.2016

Law360 Quotes Peter Barnes: Tax Pros Warn Global Tax Reports May Not Be Confidential

*Law360*, 11.03.2016

Bloomberg BNA Quotes Peter Barnes: Country-by-Country Confusion: Narrow BEPS Queries Abound

*Bloomberg BNA*, 11.03.2016

Marketplace Quotes Peter Barnes on Apple's Irish Tax Bill

*Marketplace*, 08.31.2016

Bloomberg BNA Quotes David Rosenbloom on the Exit Tax

*Bloomberg BNA*, 08.29.2016

Best Lawyers in America Lists 18 Caplin & Drysdale Attorneys

Awards & Rankings | *U.S. News & World Report*, 08.15.2016

Caplin & Drysdale Listed in "Above the Law's" Tax Firm Power List

Awards & Rankings | *Above the Law*, 07.29.2016

David Rosenbloom Comments on Notable Tax Laws and Regulations of 2016  
*Law360*, 07.12.2016

David Rosenbloom Comments on EU Starbucks Ruling in Bloomberg BNA  
*Bloomberg BNA*, 07.05.2016

Bloomberg BNA Quotes Peter Barnes on Companies Incorporating Outside the U.S.  
*Bloomberg BNA*, 06.24.2016

Bloomberg BNA Quotes Clark Armitage on New IRS Audit Strategy  
*Bloomberg BNA*, 06.23.2016

David Rosenbloom Discusses U.S. Uses New Model Treaty Language in Luxembourg Protocol with Tax Notes  
*Tax Notes*, 06.23.2016

Bloomberg BNA Quotes David Rosenbloom on Luxembourg and U.S. Working on Treaty Language  
*Bloomberg BNA*, 06.23.2016

Three Caplin Lawyers Distinguished by Best Lawyers  
Awards & Rankings | *Business Edition of Best Lawyers*, 06.21.2016

Caplin & Drysdale Recognized for Cutting Edge Advice  
Awards & Rankings | *The Legal 500*, 06.16.2016

Peter Barnes Comments on Medtronic Victory  
*Bloomberg BNA*, 06.15.2016

Mark Allison Comments on Tax Court Extending Limitations Period  
*Federal Tax Weekly*, 06.09.2016

Tax Notes Quotes Mark Allison on IRS Memo  
*Tax Notes Today*, 06.08.2016

Law360 Quotes Clark Armitage on Country-by-Country Tax Reporting  
*Law360*, 06.06.2016

Caplin & Drysdale Listed Among Top Lawyers for Tax, Bankruptcy, Estate Planning and Political Law  
Awards & Rankings | *Chambers USA*, 06.01.2016

Law360 Quotes Mark Allison on Wyly Ruling  
*Law360*, 05.11.2016

Scott Michel and Mark Matthews Comment on Number of U.S. Taxpayers Exposed by Panama Papers  
*Tax Notes*, 05.10.2016

Tax Notes Quotes Richard Skillman: Transfer Pricing Needs a "Save Shot"  
*Tax Notes Today*, 05.02.2016

Tax Notes Quotes Peter Barnes: Governments Urged to Use Transfer Pricing Values to Acquire IP  
*Tax Notes*, 04.29.2016

Super Lawyers Recognizes Caplin & Drysdale Lawyers from Several Practice Areas  
Awards & Rankings | *Super Lawyers*, 04.26.2016

Worldwide Tax Daily Quotes Clark Armitage: Bermuda Agrees to Automatic Exchange of Country-by-Country Reports

*Worldwide Tax Daily*, 04.21.2016

Tax Notes Quotes David Rosenbloom on G-20 Tax Agenda at 2016 NYU/KPMG Tax Lecture

*Tax Notes Today*, 04.19.2016

Irish Examiner Quotes David Rosenbloom on Proposed Regulations Aimed at "Earnings Stripping"

*Irish Examiner*, 04.12.2016

Bloomberg BNA Quotes Patricia Lewis on New IRS Appointment

*Bloomberg BNA*, 04.12.2016

Tax Notes Today Quotes David Rosenbloom on U.S. Model Tax Convention

*Tax Notes Today*, 04.11.2016

Patricia Lewis and Anne O'Brien Named in 2016 "Best of the Best" Global Ranking

Awards & Rankings | *Expert Guides*, 04.05.2016

Elizabeth Stevens Speaks with Army Wife Talk Radio on Employer Tax Breaks for Hiring Vets

*Army Wife Talk Radio*, 04.05.2016

Bloomberg BNA Quotes Mark Matthews and Peter Barnes on Impact of Panama Papers

*Bloomberg BNA*, 04.04.2016

Peter Barnes Comments on New Tax Laws Affecting LLCs

*Bloomberg BNA*, 04.01.2016

Bloomberg BNA Quotes Clark Armitage on Coco-Cola's Billion Dollar Tax Dispute with IRS

*Bloomberg BNA*, 03.16.2016

Law360 Quotes David Rosenbloom on Binding Arbitration Provision in Model Tax Treaty

*Law360*, 02.26.2016

Worldwide Tax Daily Quotes David Rosenbloom on the Revised U.S. Model Tax Convention

*Worldwide Tax Daily*, 02.18.2016

Bloomberg Quotes David Rosenbloom on Europe Going After Google and Others for Paying Minimal Taxes

*Bloomberg Business*, 02.18.2016

Peter Barnes Comments on BEPS Project and How Multinationals Structure Their Operations

*BNA's Tax Management Transfer Pricing Report™*, 01.08.2016

Tax Notes Quotes David Rosenbloom on the U.S. Model Tax Treaty

*Tax Notes*, 11.30.2015

Washingtonian Names Caplin & Drysdale Attorneys Among Washington's Top Lawyers

Both | 11.19.2015

Law360 Quotes Mark Allison on 5 Things Keeping Tax Attorneys Up At Night

*Law360*, 11.17.2015

Tax Notes Quotes Peter Barnes on REIT Spins

*Tax Notes*, 11.16.2015

U.S. News & World Report Lists Caplin & Drysdale in "Best Law Firms" for 2016 Awards & Rankings | 11.02.2015

Caplin & Drysdale's Transfer Pricing Team Receives International Award Awards & Rankings | 10.20.2015

Peter Barnes Comments on BEPS 'Master File' Requirements Raising Concern *Bloomberg BNA's Daily Tax Report*, 10.09.2015

David Rosenbloom Comments on BEPS Action 2: The Hybrid Hydra *Tax Notes Today*, 10.06.2015

Bloomberg Quotes David Rosenbloom: Google to Apple Could See Tax Loopholes Curbed in OECD Proposal *Bloomberg Business*, 10.05.2015

Mark Allison Comments on Chief Counsel's Recommended Changes to Tax Court Rules *Standard Federal Tax Reports*, 10.01.2015

Mark Allison Talks to Tax Notes on IRS Suggested Changes to Tax Court Rules *Tax Notes Today*, 09.23.2015

Peter Barnes Comments on Country-By-Country Reporting *Bloomberg BNA's Transfer Pricing Report*, 09.21.2015

Caplin & Drysdale Lawyers Listed Among NY's Super Lawyers® Both | *Caplin & Drysdale*, 09.16.2015

H. David Rosenbloom Comments on Questions Remaining on BEPS, U.S. Model Treaty Changes *International Tax Monitor*, 08.14.2015

International Tax Monitor Quotes Patricia Lewis on Advance Pricing Agreements *Daily Tax Report and International Tax Monitor*, 08.12.2015

*The American Lawyer* Names Caplin & Drysdale Global Legal Award Recipient for Swiss Tax Investigations Awards & Rankings | *The American Lawyer*, 07.31.2015

David Rosenbloom Comments on *Altera Corp v. Commissioner* and the Arm's Length Standard *International Tax Monitor*, 07.31.2015

Caplin & Drysdale's International Tax Group Earns Top Honors for Second Consecutive Year Awards & Rankings | *The Legal 500*, 07.29.2015

Caplin & Drysdale Lawyers Listed Among World's Leading Women in Business Law Awards & Rankings | *Expert Guides*, 07.28.2015

Law360 Quotes Mark Allison on Tax Cases to Watch in the 2nd Half of 2015 *Law360*, 07.13.2015

David Rosenbloom Comments on U.S.-Vietnam Income Tax Treaty *Worldwide Tax Daily*, 07.09.2015

David Rosenbloom Comments on Baseball-Style Mandatory Binding Arbitration *Tax Notes Today*, 07.09.2015

Peter Barnes Comments on What the Model CbC Legislation Says About Transparency *Worldwide Tax Daily*, 06.22.2015



Patricia Lewis Discusses OECD Discussion Draft at Transfer Pricing Conference  
*International Tax Monitor*, 06.12.2015

Caplin & Drysdale's New York Office Welcomes Jonathan Brenner to Tax Practice  
Press Releases | 06.09.2015

Caplin & Drysdale Named Top Tier Firm for Tax Controversy  
Both | 06.08.2015

David Rosenbloom Comments on OECD's BEPS Proposals in Europe  
*Tax Notes Today*, 06.08.2015

International Tax Monitor Quotes Peter Barnes on Amazon's Changing Luxembourg Strategy  
*Bloomberg BNA*, 05.27.2015

David Rosenbloom Comments on U.S. Model Tax Treaty Proposals  
*Tax Notes Today*, 05.22.2015

Clients and Peers Distinguish Caplin & Drysdale in Chambers' Rankings  
Awards & Rankings | *Chambers USA*, 05.19.2015

Law360 Quotes Mark Allison on High Court Levels Individual, Corporate Taxes in Md. Ruling  
*Law360*, 05.18.2015

Bloomberg BNA Quotes David Rosenbloom on Grand Jury Probe in Caterpillar Case  
*Bloomberg BNA*, 05.13.2015

Clark Armitage Comments on Adverse EU State Aid Ruling and Apple  
*Worldwide Tax Daily*, 05.01.2015

Bloomberg Quotes David Rosenbloom on 15th Annual Tax Lecture Series  
*Bloomberg BNA*, 04.30.2015

Super Lawyers Lists Caplin & Drysdale Lawyers  
Both | *Caplin & Drysdale*, 04.23.2015

David Rosenbloom Named "Best of the Best USA" by Expert Guides  
Awards & Rankings | *Expert Guides*, 04.10.2015

Law360 Quotes Mark Allison on 7 Tips for Dealing With a Cash-Strapped IRS  
*Law360*, 04.10.2015

Worldwide Tax Daily Quotes David Rosenbloom on Arbitration in International Tax Matters  
*Worldwide Tax Daily*, 03.31.2015

Law360 Quotes Peter Barnes on BEPS Changes  
*Law360*, 03.23.2015

Worldwide Tax Daily Quotes Peter Barnes on BEPS Interest Deduction Guidance Coming  
*Worldwide Tax Daily*, 03.02.2015

Caplin & Drysdale Elects Three New Members  
Press Releases | *Caplin & Drysdale*, 02.02.2015

Peter Barnes Comments on BEPS Shifts From Talk to Action in 2015  
*Bloomberg BNA*, 01.22.2015

Bloomberg Quotes David Rosenbloom on 'Dynamic Scoring'  
*Bloomberg BNA*, 01.22.2015

Clark Armitage Comments on European Commission Details Challenging Luxembourg's Amazon Ruling  
*Worldwide Tax Daily*, 01.20.2015

Mark Allison Comments on MoneyGram Bank Ruling Will Keep Financial Cos. On Alert  
*LAW360*, 01.15.2015

David Rosenbloom Comments on Dynamic Scoring of Tax Measures  
*The Washington Post*, 01.11.2015

David Rosenbloom Comments on Hong Kong Banks Avoiding FATCA  
*Worldwide Tax Daily*, 12.19.2014

David Rosenbloom Comments on Proposed Improvements to Treaty Dispute Resolution Process  
*Worldwide Tax Daily*, 12.19.2014

Peter Barnes Comments on Transfer Pricing Special Measures  
*Worldwide Tax Daily*, 12.17.2014

Caplin & Drysdale Attorneys Featured in Newsweek: How Google and Apple Make Their Taxes Disappear  
*Newsweek*, 12.14.2014

Worldwide Tax Daily Quotes Peter Barnes: OECD Considering CbC Reporting Exemption for Small Taxpayers  
*Worldwide Tax Daily*, 12.12.2014

Law360 Quotes Kirsten Burmester: As FATCA Slowly Rolls Out, Its Impact Is Uneven  
*Law360*, 11.20.2014

David Rosenbloom Comments on IRS Releasing Final Regulations on Gain Recognition Agreements  
*Worldwide Tax Daily*, 11.19.2014

Worldwide Tax Daily Quotes Peter Barnes: Countries Aren't Waiting on OECD to Implement BEPS  
*Worldwide Tax Daily*, 11.12.2014

Michael Pfeifer and Kirsten Burmester Comment on Tax Returns of Americans Living Abroad Under Scrutiny  
*MainStreet*, 11.10.2014

Law360 Quotes Peter Barnes: OECD's Base Erosion Plan Puts U.S. On The Spot  
*Law360*, 11.06.2014

Worldwide Tax Daily Quotes Neal Kochman: Amazon U.S. Tax Court Trial Gets Underway  
*Worldwide Tax Daily*, 11.03.2014

David Rosenbloom Comments on OECD Options for Preventing Artificial Avoidance of PE Status  
*Worldwide Tax Daily*, 11.03.2014

David Rosenbloom Comments on BEPS Discussion Draft Including Intra-Group Service Fees  
*Bloomberg BNA*, 11.03.2014

Neal Kochman Comments on Amazon Case Challenging IRS Income Method for Valuing Intangibles  
*Bloomberg BNA*, 10.30.2014

Newsweek Quotes Mark Allison: Settlements Are Tax Write-Offs for Banks  
*Newsweek*, 10.27.2014

Caplin & Drysdale Lawyers Listed Among World's Leading Tax Advisers  
Awards & Rankings | *Expert Guides*, 10.16.2014

Clark Armitage Comments on the EU's Investigation of Amazon Tax Ruling for State Aid Breach  
*Worldwide Tax Daily*, 10.08.2014

On the Eve of IFA-Mumbai, Bloomberg Interviews Scott Michel and David Rosenbloom: FATCA Strengthens U.S.  
Tax Enforcement Hand in India  
*Daily Tax Report and International Tax Monitor*, 10.08.2014

Fortune Lists Caplin & Drysdale Lawyers Among Leaders in the Law  
Awards & Rankings | *Fortune Magazine*, 10.06.2014

Clark Armitage Comments on EU State Aid Cases Against Apple and Fiat  
*Tax Analysts*, 10.01.2014

Caplin & Drysdale's International Tax Group Earns Top Award from Legal 500  
Awards & Rankings | *Caplin & Drysdale*, 09.23.2014

Mark Allison Comments on Privilege Case's Importance  
*Tax Notes Today*, 09.22.2014

Caplin & Drysdale Lawyers Chosen as "The Best of the Best USA" for 2014  
Awards & Rankings | 09.16.2014

Peter Barnes Comments on Tax Planning Pioneer John Samuels Leaving General Electric  
*Tax Notes Today*, 09.15.2014

David Rosenbloom Comments on Domestic FATCA Requirements Possibly Complicating Compliance  
*International Tax Monitor*, 08.27.2014

Fortune Magazine Lists Patricia Lewis and Richard Skillman as Top Rated Lawyers  
Awards & Rankings | *Fortune Magazine*, 08.25.2014

Caplin & Drysdale Lawyers Earn Best Lawyers Ranking  
Awards & Rankings | 08.21.2014

David Rosenbloom's FATCA Interview Makes Headlines in Brazil  
*Jornal do Comércio (Journal of Commerce)*, 08.18.2014

The International Tax Review Quotes Mark Allison: Phase II of the AJAC May Increase U.S. Litigation  
*International Tax Review*, 08.13.2014

Mark Allison Comments on IRS Finalizing Material Advisor Regulations  
*CCH Standard Federal Tax Reports*, 08.07.2014

Guide to World's Leading Women in Business Law Lists Caplin & Drysdale Lawyers  
Awards & Rankings | *Expert Guides*, 07.29.2014

Bloomberg BNA Quotes David Rosenbloom and Peter Barnes: Could the White House Act Unilaterally on  
Taxes?  
*Bloomberg BNA*, 07.25.2014

With Its Founders, Caplin & Drysdale Celebrates 50 Years of Excellence  
Press Releases | *Caplin & Drysdale*, 07.23.2014

Patricia Lewis Named "Best of the Best" in Transfer Pricing Awards & Rankings | *Expert Guides*, 07.15.2014

Tax Analysts Quotes Clark Armitage on IRS Resignations Affecting U.S.-India Talks on MAP Cases  
*Tax Analysts*, 07.08.2014

Clients and Peers Recommend Caplin & Drysdale in 2014 Legal 500 Ranking Awards & Rankings | *The Legal 500*, 07.01.2014

Bloomberg BNA Quotes Peter Barnes: US States' Approach to Nexus and Apportionment – Oddity or New Trend?  
*Bloomberg BNA*, 06.27.2014

CCH Standard Federal Tax Reports Quotes Mark Allison: Supreme Court Clarifies Standard for Challenges to IRS Summonses  
*CCH Standard Federal Tax Reports*, 06.26.2014

Worldwide Tax Daily Quotes Peter Barnes: State Model Not Sole Solution to Taxing Global Income  
*Worldwide Tax Daily*, 06.19.2014

Peter Barnes Discusses How U.S. States' Experience Can Inform Global Tax Reform  
*Worldwide Tax Daily*, 06.19.2014

Bloomberg's International Tax Monitor Quotes Peter Barnes: Solution to BEPS May Be Menu of Options  
*International Tax Monitor*, 06.18.2014

LAW360 Quotes Mark Allison: High Court Could Dim IRS Summons Power  
*Law360*, 06.11.2014

Clients Choose Caplin & Drysdale as Transfer Pricing Law Firm of the Year in Washington, D.C. Awards & Rankings | *Global Law Experts*, 06.09.2014

Worldwide Tax Daily Quotes Peter Barnes on OECD Tax Conference Panel Discussion  
*Worldwide Tax Daily*, 06.06.2014

Patricia Lewis Named Best in Transfer Pricing for 2014  
*International Financial Law Review, Americas Women in Business Law Awards*, 06.05.2014

Caplin & Drysdale Earns Top Honors in 2014 Chambers USA Awards & Rankings | *Chambers USA*, 05.28.2014

Reuters Quotes Mark Allison: MoneyGram Claims Bank Status in Tax Dispute with IRS  
*Reuters*, 05.27.2014

David Rosenbloom Comments on Senator Paul's Objections to Tax Treaties  
*Worldwide Tax Daily*, 05.09.2014

Peter Barnes Discusses the OECD's Proposed Country-By-Country Reporting Template  
*Bloomberg BNA's Transfer Pricing Report*, 05.09.2014

Tax Notes Today Quotes David Rosenbloom: EBay Accepts 'Buy It Now' Tax Price on \$9 Billion Repatriation  
*Tax Notes Today*, 05.01.2014

The Washington Post Lists Caplin & Drysdale Attorneys Among the Top Attorneys in D.C. Awards & Rankings | *The Washington Post*, 04.30.2014

Tax Analysts Quotes Neal Kochman: Auditors Seeking More Information on Global Operations  
*Tax Analysts*, 04.30.2014

NPR Quotes David Rosenbloom: Tax Breaks Could Be Biggest Prize in Pfizer Deal For AstraZeneca  
*NPR*, 04.28.2014

Mark Allison Comments on Tax Court Decision  
*Federal Tax Weekly*, 04.24.2014

Tax Notes Today Quotes Mark Allison: Good-Faith Defense Waives Attorney-Client Privilege  
*Tax Notes Today*, 04.17.2014

Tax Analysts Quotes David Rosenbloom: OECD's LOB Approach Needs Refinement, Practitioners Say  
*Worldwide Tax Daily*, 04.15.2014

Tax Notes Today Quotes Kirsten Burmester: Toward a Solution to the PFIC Problem  
*Tax Notes Today*, 04.14.2014

Transfer Pricing Report Quotes Peter Barnes on the OECD's Country-by-Country Reporting Template  
*Transfer Pricing Report*, 04.07.2014

Tax Notes Today Quotes Mark Allison: Tax Court Retains Jurisdiction Over Worker Classification Case  
*Tax Notes*, 04.04.2014

Transfer Pricing Weekly Quotes Patricia Lewis Regarding IRS Proposals to Revise APA and MAP Procedures  
*Transfer Pricing Weekly*, 04.03.2014

Tax Notes Today Quotes Peter Barnes: Should Corporate Tax Returns Be Disclosed?  
*Tax Notes Today*, 03.31.2014

Tax Notes Today Quotes David Rosenbloom: OECD Drafts Call for Domestic Law Solutions to Hybrid Mismatches  
*Tax Notes Today*, 03.20.2014

Bloomberg Quotes Peter Barnes: Budget Woes, Mounting Demands Force IRS to Think Strategically, Focus on Training  
*Bloomberg BNA*, 03.20.2014

Patricia Lewis Analyzes Proposed Revisions to U.S. APA and Competent Authority Procedures  
*Tax Analysts*, 03.10.2014

Tax Notes Today Quotes David Rosenbloom: Senate Committee Announces Hearing on Pending Tax Treaties  
*Tax Notes Today*, 02.20.2014

Executive Leaders Radio Hosts David Rosenbloom  
*Executive Leaders Radio*, 02.20.2014

Tax Analysts' Worldwide Tax Daily Quotes Patricia Lewis: Proposed U.S. Competent Authority Procedures Could Complicate Issue Resolution  
*Tax Notes*, 02.13.2014

Bloomberg Interviews Former GE Tax Counsel Peter Barnes on BEPS, Country-by-Country Reporting, and Documentation  
*Bloomberg BNA*, 01.09.2014

Caplin & Drysdale Strengthens Global Tax and Litigation Services  
Press Releases | 01.08.2014

Tax Directors Handbook Recommends Caplin & Drysdale As A Leading Tax Law Firm  
Awards & Rankings | *Tax Directors Handbook*, 12.19.2013

Patricia Lewis Comments on Concerns Over Revised APA and Competent Authority Procedures  
*Tax Notes*, 12.13.2013

CCH Quotes Mark Allison: Supreme Court Upholds IRS's Application Of Valuation Misstatement Penalty To  
Sham Transaction  
*CCH Federal Tax Weekly*, 12.12.2013

Tax Notes Quotes Mark Allison on Supreme Court Tax Shelter Case  
*Tax Notes*, 12.04.2013

Washingtonian Recognizes Caplin & Drysdale Attorneys Among Washington's Best Lawyers  
Awards & Rankings | *Washingtonian Magazine*, 12.03.2013

Patricia Lewis and David Rosenbloom are Listed Among World's Leading Transfer Pricing Advisers  
Awards & Rankings | *Expert Guides*, 11.15.2013

NYTimes quotes Mark Allison on U.S.-France Tax Evasion Agreement  
*The New York Times*, 11.14.2013

Caplin & Drysdale Lawyers Listed in World's Leading Women in Business Law  
Awards & Rankings | *Expert Guides*, 11.08.2013

WSJ Quotes Mark Allison on Benefits to U.S. Companies Complying with Tax Authorities  
*The Wall Street Journal*, 11.08.2013

DOJ Deal with Swiss Banks Impacts U.S. Taxpayers and Financial Firms Around the World  
Press Releases | 10.31.2013

19 Caplin & Drysdale Attorneys Achieve Best Lawyers in America Ranking  
Awards & Rankings | *U.S. News & World Report*, 10.21.2013

Caplin & Drysdale Enhances Tax Practice with Three Lateral Hires  
Press Releases | 10.01.2013

CCH Quotes Mark Allison: Seventh Circuit Upholds Valuation Misstatement Penalty  
*CCH Federal Tax Weekly*, 09.05.2013

World Tax Lists Caplin & Drysdale as a Global Tax Leader  
Awards & Rankings | *International Tax Review*, 09.03.2013

U.S.-Swiss Tax Deal Impacts U.S. Account Holders and Dozens of Swiss Financial Institutions  
Press Releases | 08.29.2013

Ex-Qwest CEO Nacchio Seeks Tax Refund as Prison Term Ends  
*Bloomberg*, 08.20.2013

Patricia Lewis Listed Among Global Tax Controversy Leaders for 2013  
Awards & Rankings | *Tax Controversy Leaders*, 08.13.2013

New York State Tax Crackdown Requires Prompt Action on Past-Due Taxes  
Press Releases | 08.07.2013

Tax Notes Quotes Mark Allison: Tax Court Strikes Down John Hancock's LILLO/SILO Transactions  
*Tax Notes*, 08.06.2013

Vault Ranks Caplin & Drysdale a Top Tax Practice for 2014  
Awards & Rankings | *Vault*, 07.16.2013

Patricia Lewis Moderates Transfer Pricing Panel Discussion  
*Bloomberg*, 07.15.2013

Chicago Tribune Quotes David Rosenbloom: IRS Battles Tech Companies Over 2004 Offshore Tax Holiday  
*Chicago Tribune*, 07.02.2013

Swiss TV Interviews David Rosenbloom: Swiss Parliament Pushes Back on U.S. Banks Deal  
*Radio Télévision Suisse*, 06.19.2013

David Rosenbloom Testifies Before the Canadian Parliament on Proposed Tax Agreements  
*Parliament of Canada, House of Commons Standing Committee on Finance*, 06.17.2013

Scott Michel and David Rosenbloom Quoted on Recent U.S. Efforts to Tackle Offshore Tax Evasion  
*Tax Notes*, 06.10.2013

Scott Michel and Michael Pfeifer Selected for Legal Tax Advisory Board  
06.10.2013

The Legal 500 Recommends Caplin & Drysdale As a Leading Firm For 2013  
Awards & Rankings | *The Legal 500*, 06.03.2013

Radio Télévision Suisse Interviews David Rosenbloom About Swiss Banking Agreement with the U.S.  
*Radio Télévision Suisse*, 05.30.2013

Swiss Media Quotes David Rosenbloom: Swiss Banking Deal Aims to End Tax Dispute with U.S.  
*Tages-Anzeiger*, 05.30.2013

14 Caplin & Drysdale Attorneys Recognized in Chambers USA 2013  
Awards & Rankings | *Chambers USA*, 05.29.2013

Tax Notes Quotes Patricia Lewis Regarding New OECD Transfer Pricing Safe Harbor Guidelines  
*Tax Notes*, 05.22.2013

Bloomberg Interviews David Rosenbloom Regarding Apple's Tax Strategy  
*Bloomberg*, 05.21.2013

David Rosenbloom Comments on Senate Committee Hearing Highlighting Apple's Offshore Accounts  
*MacNewsWorld*, 05.17.2013

Scott Michel and David Rosenbloom Quoted On the Impact of Offshore Tax Evasion  
*CardHub.com*, 05.10.2013

Scott Michel and David Rosenbloom Cited in Canadian Report on Tax Evasion  
*Canadian House of Commons - Report on the Standing Committee on Finance*, 05.01.2013

Super Lawyers Lists Nineteen Caplin & Drysdale Attorneys  
Awards & Rankings | *Super Lawyers*, 04.29.2013

Mark Allison Quoted in CCH Regarding U.S. Virgin Islands Tax Controversy  
*CCH*, 04.25.2013

China Radio International Speaks With David Rosenbloom Regarding Tax Day in the U.S.  
*Beyond Beijing*, 04.15.2013

Tax Notes Quotes Mark Allison on Professional Golfer's Endorsement Income Allocation  
*Tax Notes*, 04.08.2013

Tax Notes Quotes Mark Allison on Supreme Court Ruling in COBRA Tax Shelter Case  
*Tax Notes*, 03.26.2013

Scott Michel and David Rosenbloom Comment on Americans with Asian Bank Accounts  
*Bloomberg*, 03.25.2013

Mark Allison Quoted by CCH Regarding Tax Court Valuation Misstatement Penalty  
*CCH*, 03.21.2013

Caplin & Drysdale Attorneys Recognized by Peers in Best Lawyers in America  
Awards & Rankings | 03.18.2013

Caplin & Drysdale Lawyers Alert International Athletes to Beware Endorsement Tax Issues  
Press Releases | 03.18.2013

Tax Notes Quotes Mark Allison on Gross Valuation Penalty  
*Tax Notes*, 03.18.2013

PODCAST: IRS Targeting Tax Havens in Singapore and Hong Kong  
*Accounting Today*, 03.12.2013

Caplin & Drysdale Receives Tax Awards  
Awards & Rankings | 02.27.2013

Mark Allison Quoted in Tax Notes, Practitioners Parse Promoters' Wins in Sale-Leaseback Tenant Improvements  
Transaction  
*Tax Notes*, 02.12.2013

Neal Kochman Comments on Amazon's IRS Dispute  
01.15.2013

U.S. News Recognizes Caplin & Drysdale With Top Ranking  
Awards & Rankings | 11.08.2012

Mark Allison Elected to American College of Tax Counsel  
*Caplin & Drysdale*, 10.02.2012

Caplin & Drysdale Announces Expansion of Tax Practice and Relocation of New York Office  
Both | 09.20.2012

H. David Rosenbloom Quoted in Reuters, Chipmaker Altera, U.S. IRS Fight in Cross-Border Tax Case  
*Reuters*, 07.24.2012

H. David Rosenbloom Discusses FATCA at NYU Law Conference  
*NYU School of Law News*, 06.21.2012



Chambers and Legal 500 Recognize Caplin & Drysdale in 2012 Top Rankings  
Both | *Chambers USA / The Legal 500*, 06.12.2012

Patricia G. Lewis Quoted in Bloomberg BNA Daily Tax Report, OECD Working Group to Issue Draft On Standard Approach to Safe Harbors  
*Bloomberg BNA Daily Tax Report*, 06.05.2012

Patricia Gimbel Lewis Wins "Best in Transfer Pricing" Award, Women in Business Law Awards for the Americas Awards & Rankings | *Euromoney Legal Media Group*, 05.25.2012

David Rosenbloom Quoted in Bloomberg, Eaton Expects \$160 Million Tax Savings From Ireland Move  
*Bloomberg*, 05.21.2012

The Washingtonian Lists Eight Caplin & Drysdale Attorneys as Top Lawyers in Washington Awards & Rankings | *Washingtonian Magazine*, 12.30.2011

David Rosenbloom Quoted in The New York Times, Law to Find Tax Evaders Denounced  
*The New York Times*, 12.26.2011

2012 Tax Directors Handbook Ranks Caplin & Drysdale as Leading Tax Law Firm Awards & Rankings | *Tax Directors Handbook*, 12.01.2011

Scott Michel Comments in The Wall Street Journal, Credit Suisse to Name Names  
*The Wall Street Journal*, 11.08.2011

Scott Michel Comments in Reuters, Credit Suisse Will Disclose Names of U.S. Clients  
*Reuters*, 11.08.2011

David Rosenbloom Quoted in Financial Post, Swiss Banks Near Deal to Disclose Customer Names to U.S.  
*Financial Post*, 10.24.2011

David Rosenbloom Comments in Bloomberg Article, Repatriation Bill to Tax Overseas Profit at 8.75 Percent  
*Bloomberg*, 10.06.2011

Bloomberg Law Interview: Scott Michel Says Financial Firms Are Struggling to Comply With FATCA  
*Bloomberg Law*, 09.29.2011

Scott Michel Quoted in Financial Post, IRS Strikes a Conciliatory Tone Toward Canadians  
*Financial Post*, 09.28.2011

Scott Michel Quoted in Reuters, U.S. Readies Papers V. Swiss Banks on Tax Evasion  
*Reuters*, 09.10.2011

Scott Michel Comments on the IRS Amnesty for Undeclared Offshore Account Holders  
*Bloomberg*, 09.07.2011

Scott Michel Quoted in Swissinfo, Banks Say U.S. Tax Deal Must Respect Swiss Law  
*swissinfo*, 09.05.2011

The Best Lawyers in America Ranks 19 Caplin & Drysdale Attorneys as Leaders in Their Field Awards & Rankings | *U.S. News & World Report*, 09.01.2011

Scott Michel Comments in CNBC and The Wall Street Journal About IRS Crackdown of Undeclared Offshore Accounts  
*CNBC, Wall Street Journal*, 08.19.2011

---

Scott Michel Comments on Possible U.S. Indictment of Swiss Bank Credit Suisse on Tax Evasion Charges  
*Reuters*, 07.15.2011

Chambers and Legal 500 Recognize Caplin & Drysdale in 2011 Top Rankings  
Both | *Chambers USA / The Legal 500*, 06.16.2011

Scott Michel Comments on U.S. Crackdown of Undeclared Offshore Accounts  
*Bloomberg*, 03.11.2011

Caplin & Drysdale Attorneys Ranked in Legal Media Group's Expert Guides  
Awards & Rankings | *Expert Guides*, 03.01.2011

Scott Michel Comments on U.S. Indictments of Credit Suisse Employees  
*Swiss Info*, 02.27.2011

Scott Michel Comments on IRS's Second Amnesty Program for Undeclared Offshore Account Holders  
*The Wall Street Journal, Bloomberg, The New York Times, Automated Trader, Tax Analysts, South China Morning Post*, 02.23.2011

Caplin & Drysdale Attorneys Comment on WikiLeaks' Release of Offshore Account Data  
*The Wall Street Journal, World Radio Switzerland, The New York Times, Marketplace*, 02.03.2011

David Rosenbloom Comments on Tax Code Reform  
*Bloomberg*, 01.27.2011

WikiLeaks' Release of 2,000 Foreign Bank Accounts to Spell Tax Complications for Undeclared Account Holders  
Press Releases | 01.17.2011

David Rosenbloom Comments on U.S. Companies' Use of Repatriation Strategies to Avoid Taxes  
*Bloomberg*, 12.29.2010

Scott Michel States Switzerland's Cantonal Banks Next Target of U.S. Tax Investigators  
*World Radio Switzerland*, 12.28.2010

Tax Directors Handbook Ranks Caplin & Drysdale as Leading Tax Law Firm  
Awards & Rankings | *Tax Directors Handbook 2011*, 11.01.2010

The Metropolitan Corporate Counsel Interviews David Rosenbloom  
*The Metropolitan Corporate Counsel*, 10.04.2010

David Rosenbloom Comments on Undeclared Offshore Banking's Shift to the East  
09.24.2010

Caplin & Drysdale Recognized in 2011-2012 U.S. News-Best Law Firms Ranking  
*U.S. News & World Report*, 09.15.2010

Scott Michel Comments on IRS Scrutiny of Tax Attorneys  
*Financial Adviser*, 08.31.2010

Scott Michel Comments on U.S. Government's Investigation of Offshore Accounts  
*Tax Analysts, Eurasia Review, The Wall Street Journal*, 08.24.2010

David Rosenbloom Comments on IRS's Reorganization for Global Enforcement  
*The Wall Street Journal*, 08.06.2010



---

19 Caplin & Drysdale Attorneys Named Best Lawyers in America Awards & Rankings | *U.S. News & World Report*, 08.04.2010

Scott Michel Comments on Swiss Approval of UBS Settlement With the U.S. *Bloomberg, Schweizer Fernsehen*, 06.17.2010

Chambers USA and Legal 500 Recognize Caplin & Drysdale in 2010 Top Rankings Both | *Chambers USA / The Legal 500*, 06.15.2010

Scott Michel Comments on Swiss-U.S. Deal on UBS *Forexyard, The New York Times*, 06.09.2010

Daniel B. Rosenbaum Comments on Audit of Employers Regarding Employment Tax *Tax Analysts*, 05.28.2010

Christopher Rizek Comments on IRS's Openness About Its Disciplinary Proceedings *Financial Adviser*, 05.24.2010

David Rosenbloom Comments on International Tax Policy *Insurance News*, 05.11.2010

Caplin & Drysdale Attorneys Comment on the End of the Era of Bank Secrecy *Forexyard, Bloomberg, PRLog, FA Magazine, etc.*, 05.04.2010

Caplin & Drysdale Shortlisted for the Chambers USA Awards for Excellence 2010 Awards & Rankings | *Chambers USA*, 03.17.2010

H. David Rosenbloom Selected in The Best of the Best 2010 Awards & Rankings | *Expert Guides*, 03.01.2010

IRS Unveils Criteria for Swiss Bank Account Disclosures *The Washington Post*, 11.17.2009

Scott Michel Comments on U.S. Targeting Hong Kong for Tax Evaders *Bloomberg*, 11.12.2009

GETTING PERSONAL: Unit Should Help IRS Track Rich Tax Dodgers *The Wall Street Journal*, 11.03.2009

Washingtonian Magazine Lists Six Caplin & Drysdale Attorneys as Top Lawyers in Washington Awards & Rankings | *Washingtonian Magazine*, 11.01.2009

Scott Michel Comments on the IRS Settlement Initiative and Implications after Amnesty Deadline *The New York Times, ABC News, The Wall Street Journal, Bloomberg*, 10.28.2009

Radio Interview: Many Swiss Account Holders 'Petrified' Over U.S. Tax Probe *World Radio Switzerland*, 10.16.2009

Swiss TV Interviews David Rosenbloom on IRS Crackdown of American Taxpayers With Undeclared Offshore Accounts (French) *Le TSR*, 09.22.2009

Something to Aim for *Dealbreaker*, 09.08.2009



Swiss Deal With IRS May Hide Some Tax Cheats

*The New York Times*, 09.07.2009

Informant in Tiny Nation Toppled Decades of Banking Secrecy

*Sunlight Projects*, 08.31.2009

International Tax Review Nominates Caplin & Drysdale for Transfer Pricing Firm of the Year Award

Awards & Rankings | *International Tax Review*, 08.18.2009

U.S. Reports Agreement With UBS in Tax Case

*The New York Times*, 08.12.2009

Talent in Demand as Transfer Pricing Disputes Gain Attention

*A.E. Feldman Blog*, 06.29.2009

U.S. and Switzerland Agree to New Tax Treaty

*Swiss Info*, 06.19.2009

Chambers USA 2009 Recognizes Eight Caplin & Drysdale Attorneys as 'America's Leading Lawyers'

Awards & Rankings | *Chambers USA*, 06.15.2009

Chip Maker Xilinx Loses Tax Ruling

*Wall Street Journal*, 05.29.2009

GlaxoSmithKline, IRS Tangle in Tax Court

*Wall Street Journal*, 05.22.2009

Super Lawyers Recognizes Nine Caplin & Drysdale Attorneys in Five Practice Areas

Awards & Rankings | *Super Lawyers*, 03.27.2009

PLC's Which Lawyer? Recommended Caplin & Drysdale as Leading in Tax

Awards & Rankings | *Practical Law*, 03.02.2009

H. David Rosenbloom and Patricia G. Lewis Selected in The Best of the Best 2009

Awards & Rankings | *Expert Guides*, 03.01.2009

U.S. Seeks More UBS Account Records in Tax Battle

*Reuters*, 02.19.2009

Corporate Crime Defense Bar in Unison: More Prosecutions Are on the Way

*Corporate Crime Reporter*, 02.19.2009

Is Big Business Scared of Obama?

*The Wall Street Journal Law Blog*, 01.02.2009

Four Caplin & Drysdale Attorneys Recognized as Top Tax Practitioners in the World

Awards & Rankings | *Expert Guides*, 12.01.2008

Caplin & Drysdale Ranked #39 Out of the Top 100 Global Tax Law Firms

Awards & Rankings | 11.03.2008

## EVENTS

Peter Barnes Gives Key Note Speech at IFA Indonesia Seminar

Virtual, 12.07.2022

Christopher Rizek Explores Ethical Issues at 33rd Annual Institute on Current Issues in International Taxation  
Washington, DC, 12.16.2022

Peter Barnes Explores Recent Challenges Facing Tax Directors at ABA Annual Philadelphia Tax Conference  
The Union League of Philadelphia, 11.14.2022

Niles Elber and Melissa Wiley Address Corporate Transparency Act at International Tax Symposium  
Virtual, 10.21.2022

Peter Barnes Delivers Opening Address at IFA India APAC Conference  
Hybrid - Mumbai, India, 10.13.2022

Elizabeth Stevens Addresses Tax Treaties and Dispute Resolution at PLI Basics of International Taxation 2022  
PLI California, 09.19.2022

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

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

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

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  
Conference  
Virtual, 03.28.2022

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

Victor Jaramillo Co-Chairs Panel on Cryptocurrency and Enforcement at ABA Annual U.S. and Europe Tax  
Practice Trends Conference  
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  
Conference  
12:55 PM (CET)  
12.02.2021

Scott Michel Discusses Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program  
12.01.2021

Melissa Wiley Moderates Panel on Whether Tax Leaks Bring More Audits and Investigations at D.C. Bar Program  
12.01.2021

Peter Barnes Moderates Panel on OECD Pillar One and Two at IFA Virtual Congress  
11.30.2021

Victor Jaramillo Addresses Expatriation at U.S. and UK Tax and Estate Planning Conference  
10:00 AM EST  
11.24.2021

Peter Barnes Moderates Panel on Issues Facing Tax Directors at ABA Philadelphia Tax Conference  
11:15 AM  
11.09.2021

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

Victor Jaramillo Addresses IRS Cryptocurrency Enforcement at Latino Tax Fest  
10:00 AM to 10:50 AM PST  
09.29.2021

Elizabeth Stevens Discusses Current International Tax Landscape at ITR Women in Tax Forum West Coast 2021  
09.14.2021

Clark Armitage Addresses Transfer Pricing and HTVI at Pacific Rim Tax Conference  
4:15 PM  
09.09.2021

Peter Barnes and Lauren Smith Present U.S. Tax Update to Canadian Petroleum Tax Society  
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  
07.21.2021

Clark Armitage Addresses Economic Implications of Coke Ruling at NABE Transfer Pricing Symposium  
3:15pm - 4:30pm  
07.20.2021

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

02.23.2021

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

01.22.2021

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

10:00 AM to 11:30 AM

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

3:20 PM

11.23.2020

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

12:40 PM

11.23.2020

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

10:30 AM

11.23.2020



Victor Jaramillo Addresses Reporting Foreign Accounts at Latino Tax Fest

2:30 PM to 3:20 PM

10.28.2020

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

12:30 PM to 1:30 PM

10.28.2020

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

12:30 PM

10.02.2020

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

2:30 PM - 3:45 PM

07.22.2020

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

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

1:15 PM

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

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

07.16.2019

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

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

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

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 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

Clark Armitage Discusses Practical APA Experiences at TP Minds Americas

2:00 PM ET - 2:40 PM ET

02.26.2019

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 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

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

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

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

Victor Jaramillo Addresses International Tax Planning Incentives at 8th Annual NABE Transfer Pricing Symposium

8:30 AM to 10:00 AM

07.18.2018

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

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

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

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

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

1:15 PM - 2:15 PM

07.18.2017

Peter Barnes to Speak at International Tax Institute Seminar

12:15 PM to 2:00 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 Discuss BEPS Implementation at IFA Asia Pacific Regional Tax Conference

04.29.2017

Peter Barnes to Moderate Panel on GAARs 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

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

2:45 PM

04.27.2017

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

10:00 AM

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

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

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

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

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

Neal Kochman to Discuss Inbound and Outbound Transfer Pricing at PLI Conference  
1:00 PM  
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 CET Inaugural Conference  
09.17.2015

David Rosenbloom to Speak at BEPS/CTR III 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

Mark Allison to Speak on Court Procedure and Practice Panel  
01.30.2015

Neal Kochman to Speak on Transfer Pricing Panel  
01.30.2015

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

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

Clark Armitage to Speak at Annual Institute on International Taxation  
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

Patricia Lewis to Moderate Transfer Pricing Panel  
09.19.2014

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

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 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 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 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 Discuss Managing Global Companies at International Tax Conference  
12.07.2013

Peter Barnes to Speak on Transfer Pricings and BEPs 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



Clark Armitage to Cover Transfer Pricing at International Conference  
03.01.2013

Patricia Lewis to Chair Panel at 37th Annual Tax Law 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-CTL 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 to Speak on Section 6700 Litigation  
01.21.2011

Mark Allison Moderates Panel on Material Advisor 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

#### PUBLICATIONS

VIEWPOINT: Transfer Pricing's Next Generation  
*Tax Notes Federal*, 10.17.2022

Celebrating Leadership at the OECD  
Article | *Tax Notes International*, 09.19.2022

IRS Grants Penalty Relief for Certain 2019 and 2020 Returns  
Tax Alert | 08.25.2022

Where the Money Is: Tax and Worker Mobility  
Article | *Tax Notes International*, 08.01.2022

Financier Worldwide Annual Review: Transfer Pricing 2022 – United States  
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*  
International Tax Alert | 12.17.2021

VIEWPOINT *Toulouse*: No Treaty-Based Credit?  
Article | *Tax Notes International*, 10.25.2021

Financier Worldwide Annual Review: Global Tax 2021 – United States  
Article | *Financier Worldwide*, 10.25.2021

Wouldn't It Be Nice: Reimagining US Taxation of Outbound Investment  
Article | *IBFD Thinker, Teacher, Traveler: Reimagining International Tax*, 09.01.2021

The Morality – or Immorality – of International Tax Planning  
Article | *IBFD Thinker, Teacher, Traveler: Reimagining International Tax*, 09.01.2021

IRS "Dirty Dozen" List Includes "Potentially" Abusive Use of U.S.-Malta Tax Treaty in Pension Plans  
International Tax Alert | 08.17.2021

VIEWPOINT: The Future of Transfer Pricing  
Article | *Tax Notes International*, 08.02.2021

Yellen's Global Minimum Tax Push Likely to Crash and Burn  
Article | *Roll Call Op-Ed*, 07.23.2021

Reverse Claw-Backs Revisited: IRS Issues Post-*Altera* Guidance on Adjustments for Stock-Based Compensation Costs and Cost Sharing Arrangements  
International Tax Alert | 07.22.2021

Financier Worldwide Annual Review: Transfer Pricing 2021 – United States  
Article | *Financier Worldwide*, 06.24.2021



Biden's Proposed Tax Increases – How Do they Affect Bona Fide Residents of Puerto Rico?  
International Tax Alert | 06.01.2021

VIEWPOINT: An Old Idea and a New Start: Brazil-U.S. Tax Treaty Negotiations  
Article | *Tax Notes International*, 05.24.2021

Is an Act 60 Taxpayer Required to Have a Transfer Pricing Study?  
International Tax Alert | 04.28.2021

"Cui Bono Fisset": Coordinating U.S. Tax Statutes with U.S. Tax Treaties  
Article | *Virginia Tax Review*, 02.26.2021

IRS to "Campaign" into Puerto Rico; How can Taxpayers Defend?  
Tax Alert | 02.03.2021

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*  
International Tax Alert | 11.23.2020

Financier Worldwide Annual Review: Transfer Pricing 2020 – United States  
Article | *Financier Worldwide*, 10.05.2020

IRS Kicks Off Post-*Altera* Audit Adjustments  
Tax Alert | 09.21.2020

CFCs and the Individual Shareholder  
Article | *Tax Notes International*, 09.14.2020

Treasury Finalizes GILTI High-Tax Exclusion Rules  
Tax Alert | 07.28.2020

FDII Documentation Requirements Relaxed  
International Tax Alert | 07.20.2020

Final FDII/GILTI Regulations Withdraw Deduction Ordering Rule  
Business, Investment & Transactional Tax Alert | 07.20.2020

A Seat at the Table: Thought Leaders Discuss OECD's Plans on Digital Economy Taxation  
Article | *Tax Notes Federal*, 06.15.2020

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  
Article | *Tax Notes Federal*, 05.18.2020

CARES Act Offers Income Tax Relief for Business

Tax Alert | 03.27.2020

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

International Tax Alert | 02.11.2020

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

Article | *Tax Notes Federal Letters to the Editor*, 01.27.2020

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

International Tax Alert | 11.25.2019

U.S. Tax Policy and Cross-Border Investments in 2019: The General Picture

Article | *Rivista di Diritto Tributario Internazionale - International Tax Law Review*, 11.12.2019

An OECD "Unified Approach" to Addressing the Challenges of the Digital Economy

International Tax Alert | 11.04.2019

Sharia Law Is Already Here - The IRS Must Respond

Article | *The Hill Op-Ed*, 10.18.2019

Financier Worldwide Annual Review: Transfer Pricing 2019 – United States

Article | *Financier Worldwide*, 10.07.2019

COMMENTARY & ANALYSIS: The TCJA and the Treaties

Article | *Tax Notes International Magazine*, 09.09.2019

The Proposed GILTI High Tax Exclusion

International Tax Alert | 07.01.2019

Combating Aggressive Tax Planning Through Disclosure: A Comparison of U.S. and EU Rules Applicable to Tax Advisors

Article | *ABA Tax Times*, 06.14.2019

Agency PE: Case Study, Questions and Expert Speak

Article | *IFA India Newsletter*, 01.01.2019

Proposed Regulations Under Section 956

Business, Investment & Transactional Tax Alert | 11.06.2018

Navigating QBAI Quirks of the GILTI Regulations

Article | *Bloomberg Tax, Tax Management International Journal*, 11.05.2018

COMMENTARY & ANALYSIS: The BEAT and the Treaties

Article | *Tax Notes International Magazine*, 10.15.2018

SPECIAL REPORT: The Nitty-Gritty of FDII

Article | *Tax Notes*, 09.17.2018

Kumquat: The U.S. International Tax Issues

Article | *Tax Notes International Magazine*, 06.25.2018

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

Tax Alert | 06.01.2018

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

Tax Alert | 03.14.2018

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

Tax Alert | 12.12.2017

David Rosenbloom Comments on Tax Bills' Impact on Earnings of U.S.-Owned Foreign Corporations

Article | *The Washington Post Op-Ed*, 12.03.2017

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

Tax Alert | 11.06.2017

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?

Article | *Tax Notes*, 03.29.2017

Transfer Pricing Forum

*Bloomberg BNA*, 03.17.2017

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

Article | *Tax Notes*, 03.01.2017

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

Article | *Global Tax Weekly*, 02.16.2017

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

Article | *46 TM Int'l J. 83, Bloomberg BNA Tax Management International Journal*, 02.10.2017

IRS Launches 13 Issue-Based Corporate Compliance Campaigns

Tax Alert | 02.03.2017

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

Article | *Global Tax Weekly*, 01.05.2017

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

International Tax Alert | 12.19.2016

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

Financier Worldwide 2016 Global Tax Annual Review – United States

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

International Tax Alert | 07.29.2015

---

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

Treasury Proposes Significant Changes to U.S. Model Tax Treaty

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

OECD Releases Finalized Proposals on Key Tax Base Erosion Concerns

International Tax Alert | 09.23.2014

IRS Issues Final Regulations On Material Advisor Penalties

Article | *Global Tax Weekly*, 09.04.2014

IRS Issues Final Regulations on Material Adviser Penalties

Article | *International Law Office*, 08.29.2014

IRS Issues Final Regulations on Material Advisor Penalties

Tax Alert | 08.04.2014

Remain Vigilant On Indian Permanent Establishments, Even After the Favorable e-Funds Decision  
Article | *Global Tax Weekly*, 07.10.2014

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  
International Tax Alert | 03.27.2014

The New APMA Procedures — Cosmetic or Cosmic?  
Article | *Tax Management International Journal*, 03.14.2014

Bold Shift in IRS Approach to Transfer Pricing Controversies  
International Tax Alert | 02.27.2014

Surprise! Your Foreign Tax Credit Is Not Allowed Under Section 901(l)  
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  
Tax Alert | 10.31.2013

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?*  
Article | *Corporate Taxation*, 08.01.2013

Global Netting: Potential Opportunities for Corporate Taxpayers  
Article | *WTE Practical International Tax Strategies, Volume 17, Number 8*, 04.30.2013

Global Netting: Potential Opportunities for Corporate Taxpayers  
Business, Investment & Transactional Tax Alert | 04.10.2013

Professional Golfer Sergio Garcia to Owe More Taxes on Endorsement Income  
International Tax Alert | 03.15.2013

Mutual Administrative Assistance in Tax Matters  
Article | *Journal of Corporate Taxation*, 03.01.2013

Cruising Toward Safe Harbors for Transfer Pricing?  
Article | *Corporate Taxation*, 03.01.2013

Transfer Pricing: Rules and Practice in Selected Countries (H-1), No. 6955  
Article | *Bloomberg BNA Tax Management Portfolio*, 01.01.2013

Recent Developments: U.K. Excess Profits Tax Under the U.S. Foreign Tax Credit  
Article | *Corporate Taxation*, 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

Offshore Tax Evasion: US Initiatives  
Article | *Practical Law Company*, 04.26.2012

Case Updates-Dell Products (Norway) General Electric Capital (Canada) SNF (Australia)  
Article | *Corporate Taxation*, 03.01.2012

Before It's Too Late: Reconsidering The IRS Relief for Madoff Losses  
*Tax Notes*, 02.20.2012

Commissionaire and Contract Manufacturing Arrangements - New Developments on Permanent Establishment Issue  
Article | *Corporate Taxation*, 01.01.2012

The APA Program's Experience With Rev. Proc. 2008-31: Increased Opportunities for Certainty  
Article | *Bloomberg BNA Tax Management Memorandum*, 11.07.2011

Taxation of Passive Foreign Investment Companies: Current Rules, Problems and Possible Solutions  
Article | *Corporate Taxation*, 11.01.2011

2010 Treaty Developments  
Article | *Corporate Taxation*, 11.01.2011

Qualified Intermediaries, The EU Savings Directive, Trace--What Does FATCA Really Add  
Article | *Corporate Taxation*, 09.01.2011

India's Proposed Direct Taxes Code - Highlights For Corporate Taxpayers  
Article | *Corporate Taxation*, 07.01.2011

Recent Developments Relating to FBARs and Offshore Voluntary Disclosure Program  
International Tax Alert | 06.06.2011

Crawford's Last Stand? What Melendez-Diaz v. Massachusetts Means for the Confrontation Clause and for Criminal Trials  
Article | *2 AKRON J. CONST. L. & POLY 81*, 06.02.2011

FATCA & Foreign Bank Accounts: Has the U.S. Overreacted?  
Article | *Tax Analysts*, 05.31.2011

ITPF - Georgetown University Law Center Conference on Reform of International Tax  
Article | *Corporate Taxation*, 05.01.2011

An Overview of the Foreign Account Tax Compliance Act  
Article | *American Bar Association, 22nd Annual Spring Symposia*, 04.28.2011

Short Cuts for Small Fry: Why the IRS Should Reconsider Transfer Pricing Safe Harbors for Small Taxpayers, Transactions  
Article | *BNA Tax Management-Transfer Pricing Report*, 04.21.2011



- IRS Seeks Names of U.S. Account Holders at HSBC (India)  
Article | *Taxmann-The Tax & Corporate laws of India-International Tax*, 04.18.2011
- Putting an End to Foreign Tax Credit 'Splitting' Transactions  
Article | *Corporate Taxation*, 03.01.2011
- United States: Decoding Cross-Border Tax Compliance: CFCs, PFICs, Foreign Trusts & Foreign Gifts And Bequest  
Article | *Mondaq Business Briefing*, 03.01.2011
- Indictment of Offshore Account Holder Portends a New Round of Aggressive Enforcement  
Article | *International Taxation*, 02.01.2011
- President Obama's Efforts at International Tax Reform  
Article | *Corporate Taxation*, 01.01.2011
- The First Shoe Drops: Notice 2010-92 Provides Guidance on Section 909's Application to Pre-2011 Taxes  
Article | *14 Practical International Tax Strategies*, 12.15.2010
- The Foreign Account Tax Compliance Act and Notice 2010-60  
Article | *International Taxation*, 12.01.2010
- New Foreign Tax Credit Anti-Splitting Rule  
Article | *Tax Notes*, 11.08.2010
- Certainty for Reporting Uncertain Tax Positions (UTP) to IRS  
International Tax Alert | 10.13.2010
- Recently Enacted Provisions Relating to the Foreign Tax Credit  
International Tax Alert | 10.08.2010
- IRS's Voluntary Disclosure Program for Offshore Accounts: A Critical Assessment After One Year  
Article | *BNA Insights*, 09.21.2010
- Tax Court Rules That UK Windfall Tax Is Creditable in the United States  
Article | *International Law Office*, 09.17.2010
- Advise Client Companies to Review Payroll Practices  
Article | *Verizon Small Business Center's News & Resources*, 09.10.2010
- Federal and State Governments Target Employment Tax Compliance  
Article | *Taxation of Exempts*, 09.01.2010
- More and More Transfer Pricing Enforcement in Store!  
International Tax Alert | 08.06.2010
- Foreign Flow-Through Election's Effect on Noncompulsory Tax Treatment  
Article | *Tax Notes International*, 07.19.2010
- A Shift Toward Consumption Taxes: The Tax Policy Prescription For The Fiscal Ills of The Global Financial Crisis  
Article | *Corporate Taxation*, 07.01.2010
- The Foreign Account Tax Compliance Act  
Article | 05.11.2010
- IRS Launches New "Transfer Pricing Practice" -- Pilot Program Will Select Audit Cases for Scrutiny  
International Tax Alert | 05.05.2010

- Loan Guarantees and Transfer Pricing  
Article | *Corporate Taxation*, 05.01.2010
- Taxpayer Wins LILO Case in the Court of Federal Claims  
Article | *Real Estate Finance Journal*, 04.01.2010
- More Foreign Financial Account Reporting  
International Tax Alert | 03.26.2010
- Looking for FBARs in All the Wrong Places? Limited Relief in New Interim Guidance  
International Tax Alert | 03.15.2010
- The New Battle In An Old War: Omissions From Gross Income  
Article | *126 Tax Notes 1227*, 03.08.2010
- IRS Scrutiny of Equity Swaps Could Impact Offshore Funds  
Article | 03.05.2010
- National Westminster Bank: Will the IRS Ever Give Up  
Article | *Corporate Taxation*, 03.01.2010
- Get Ready for the Employment Tax Compliance Surge: IRS to Challenge Status of Independent Contractors  
Employee Benefits Alert | 02.18.2010
- The Curious Case of The Partial Loophole Closer  
Article | *Corporate Taxation*, 01.01.2010
- Undeclared Foreign Accounts—Voluntary Disclosures and FBARs After the IRS Settlement Initiative  
Article | *Journal of Tax Practice and Procedure*, 12.01.2009
- 2009 Treaty Developments  
Article | *Corporate Taxation*, 11.01.2009
- The New U.S.-Italy Treaty: A U.S. Perspective  
Article | *Diritto e Pratica Tributaria Internazionale*, 08.01.2009
- Addressing the Economic Downturn Under Existing Transfer Pricing Methods  
Article | *Tax Notes International*, 06.22.2009
- Comments to the Proposed Amendments to the Rules of the United States Tax Court  
Article | *American Bar Association*, 05.27.2009
- Resolución de Conflictos en Material Fiscal (in Spanish)  
Article | *Revista - Instituto Colombiano de Derecho Tributario*, 05.10.2009
- Survival Techniques: Transfer Pricing in a Sick Economy  
Article | *The Tax Executive*, 05.01.2009
- Shooting for the Stars  
Article | *WebCPA*, 04.20.2009
- Time for a Change: Toward a New Korea-U.S. Income Tax Treaty  
Article | *Tax Notes International*, 04.20.2009
- Cross-Border Information Reporting & Civil Penalties (in a Nutshell)  
Article | *Journal of Tax Practice & Procedure*, 04.01.2009

Information Reporting and Civil Penalties (In a Nutshell)

Article | 12.22.2008

A Model to Celebrate

Article | *OECD Observer*, 10.01.2008

In Praise of the OECD Model Tax Treaty

Article | *Worldwide Tax Daily*, 09.23.2008

Voluntary Disclosure Becomes A Necessity

Article | *International Tax Review*, 05.01.2008

Coming Full Circle? Secondary Adjustments and Repatriation in Transfer Pricing Cases

Article | *Tax Management Transfer Pricing Report, Bloomberg BNA*, 05.01.2008

Deductions for Non-U.S. Persons Under U.S. Income Tax Laws

Article | *International Tax Planning*, 03.01.2008

The Practical Impact of FIN48 - Is it Moving Abroad?

Article | 11.01.2007

Treasury, IRS Continues Attack on Abusive Tax Transactions: Final Regulations for Reportable Transactions Issued

Article | *Derivatives Financial Products Report*, 09.01.2007

Self-Created Transfer Pricing Adjustments

Article | *Tax Notes International*, 06.04.2007

COMMENT: Deputy-Doctors: The Medical Treatment Exception after *Davis v. Washington*

Article | 43 *CAL. W. L. REV.* 451, 2007, 05.01.2007

Pay Immediate Attention to Far-Reaching Regulations on Intercompany Services

Article | *Caplin & Drysdale*, 10.01.2006

Play it Again Sam – The IRS (More or Less) Finishes the Section 482 Services Regulations

Article | *The Tax Executive*, 10.01.2006

Tax Alert

Article | *Caplin & Drysdale*, 05.01.2006

Proposed Cost-Sharing Regulations Issued

Article | *Practical US/Domestic Tax Strategies*, 05.01.2006

Proposed Cost-Sharing Regulations Issues

Article | *Caplin & Drysdale*, 01.15.2006

A New Age in Cost Sharing? The IRS Proposed Regulations

Article | *Tax Management International Journal*, 12.09.2005

Enhanced IRS Enforcement and the Voluntary Disclosure Policy

Article | *International Law Office*, 08.26.2005

Tax Alert

Article | *Caplin & Drysdale*, 06.15.2005

The Law of Unintended Consequences: International Implications of Section 409A  
Article | *The Tax Executive*, 04.01.2005

Tax Alert  
Article | *Caplin & Drysdale*, 02.01.2005

U.S. Issues Guidance on Apportionment of Charitable Contributions to U.S.-Source Income  
Article | *Tax Notes International*, 08.09.2004

Russia: A Virtual Democracy  
Article | *The Exempt Organization Tax Review*, 08.01.2004

News on the Transfer Pricing Front  
Article | *Caplin & Drysdale*, 07.01.2004

TNI Interview: H. David Rosenbloom  
Article | *Tax Notes International*, 05.10.2004

Banes of an Income Tax: Legal Fictions, Elections, Hypothetical Determinations, Related Party Debt\*  
Article | *The Sydney Law Review*, 03.30.2004

Think About Subpart F: The Domestic Base Company  
Article | *The Tax Magazine*, 03.15.2004

India: Great Potential and Promise  
Article | *The Exempt Organization Tax Review*, 02.25.2004

Banes of an Income Tax: Legal Fictions, Elections, Hypothetical Determinations, And Related Party Debt  
Article | *Tax Notes International*, 12.31.2003

Why Not Des Moines? A Fresh Entry in the Subpart F Debate  
Article | *Tax Notes International*, 12.15.2003

Markers and Musings: The Proposed Section 482 Service Regulations  
Article | *The Tax Executive*, 12.01.2003

The Final Word on Stock Options in Cost Sharing Arrangements?  
Article | *Tax Management International Journal*, 12.01.2003

Transfer Pricing: New Rules for Services and Intangibles  
Article | *Caplin & Drysdale*, 11.01.2003

An Awakening Giant: China and the New Civil Society  
Article | *The Exempt Organization Tax Review*, 10.01.2003

Russia in Transition  
Article | *The Exempt Organization Tax Review*, 09.30.2003

Testimony of David Rosenbloom Before the U.S. Senate Committee on Finance  
Article | *Committee on Finance, United States Senate*, 07.15.2003

Corporate Taxation: New Consolidated Return Duplicated Loss Rules  
Article | *Caplin & Drysdale*, 04.01.2003

Option Wars: Upping the Ante for Cost Sharing Arrangements  
Article | *Tax Management International Journal*, 11.08.2002

- Second First?? Transfer Pricing Issues In Secondment of Personnel  
Article | *The Tax Executive*, 09.01.2002
- Deconstructing Section 905(c): An Examination of The Redetermination Rules After TRA 1997  
Article | *Tax Notes International*, 04.01.2002
- Taxes Covered By §960(a)(3)  
Article | *Tax Management International Journal*, 02.08.2002
- From the Bottom Up: Taxing the Income of Foreign Controlled Corporations  
Article | *Brooklyn Journal of International Law*, 09.01.2001
- The IRS Reorganization: Programs and Initiatives of the New Large Case Division  
Article | *Administrative Law Review*, Vol. 53, No. 2, 05.01.2001
- Arbitrage and Transfer Pricing Paper  
Article | *Report of Proceedings of the First World Tax Conference: Taxes Without Borders*, 10.01.2000
- Cost-Sharing Arrangements Come of Age  
Article | *Tax Management Memorandum*, 08.28.2000
- Transfer Pricing: A Special Report  
Article | *International Tax Review Supp. 31*, 07.01.2000
- The UPS, Limited and Compaq Cases: Is the Tide Turning?  
Article | *26 International Tax J. No. 3, 1*, 06.01.2000
- Mining For Nuggets in the IRS APA Report  
Article | *The Tax Executive*, 05.01.2000
- Transfer Pricing Thoughts - North America: More Thoughts On APA Disclosure  
Article | *Global Transfer Pricing*, 03.01.2000
- A New Way to Resolve a Factual Issue with the IRS Before Filing a Return  
Article | *Caplin & Drysdale*, 02.21.2000
- Treaties and Interest Expense Allocation: Moving in a Natwesterly Direction  
Article | *Tax Notes*, 01.17.2000
- Foreign Income Portfolios: U.S. Income Taxation of Foreign Corporations  
Article | *Tax Management*, 01.01.2000
- Transfer Pricing Thoughts - North America: Thoughts on Code Sec. 482 and Rising Standards of Proof  
Article | *Global Transfer Pricing*, 12.01.1999
- Transfer Pricing Thoughts - North America: Thoughts on Control  
Article | *Global Transfer Pricing*, 10.01.1999
- Transfer Pricing Thoughts - North America: Thoughts on Cooperatives  
Article | *Global Transfer Pricing*, 08.01.1999
- Transfer Pricing Thoughts - North America: Thoughts on APA Disclosure  
Article | *Global Transfer Pricing*, 06.01.1999
- The “Ins”; “Outs”; “Overs”; and “Unders”; of the New Global Netting Rules  
Article | *Tax Notes*, 04.26.1999

Transfer Pricing Thoughts - North America: The Euro and the Situs of the Borrower Rule  
Article | *Global Transfer Pricing*, 04.01.1999

Transfer Pricing Thoughts - North America: Thoughts on Joint Ventures  
Article | *Global Transfer Pricing*, 02.01.1999

Navigating the Global Netting Rules: Uncertainties Abound in Interest Rate Calculation Process Under New Law  
Article | *Practical U.S. /International Tax Strategies*, 12.10.1998

U.S. Proposed Global Trading Regs: Preliminary Questions Regarding Application  
Article | *Tax Notes International*, 05.23.1998

Commentary: Caplin & Drysdale Blasts Proposed Foreign Tax Credit Regs  
Article | *Tax Notes International*, 05.05.1997

The Hamas Deportation: Israel's Response to Terrorism During the Middle East Peace Process  
Article | *10 Am. U. J. Intl'l & Pol'y* 397, 01.01.1994