

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

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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

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 IRS Cryptocurrency Enforcement at Latino Tax Fest

10:00 AM to 10:50 AM PST

09.29.2021

Victor Jaramillo Addresses in Spanish IRS Cryptocurrency Enforcement at Latino Tax Fest

12:00 PM to 12:50 PM PST

09.29.2021

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

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

Peter Barnes Discusses Cases from Supreme Court of India on International Fiscal Association Webinar

4:00 PM CET

05.20.2021

Clark Armitage Explores Coca-Cola Decision on International Fiscal Association Webinar

4:15 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

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

1:00 PM - 2:15 PM

07.22.2020

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

2:30 PM - 3:45 PM

07.22.2020

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

1:15 PM

07.21.2020

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

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

02.25.2020

Clark Armitage Addresses APA & MAP at TP Minds Americas

2:30 PM - 3:10 PM

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

Kirsten Burmester Moderates Panel on Inbound and Outbound Planning After Tax Reform at ABA May Meeting
3:00 PM ET
05.10.2019

Clark Armitage Addresses Transfer Pricing and International Tax Post TCJA and BEPS at Pacific Rim Tax Conference
3:30 PM PT - 5:00 PM PT
05.10.2019

Clark Armitage Chairs Competent Authority Panel at USD Transfer Pricing Symposium
11:00 AM PT
05.09.2019

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

4:30 PM - 6:00 PM

04.11.2019

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

2:30 PM - 4:00 PM GMT

04.04.2019

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

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

03.19.2019

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

11:45 AM - 12:45 PM

03.08.2019

Elizabeth Stevens Chairs International Symposium at FBA Tax Law Conference

03.07.2019

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

02.28.2019

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

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

3:10 PM ET

11.29.2018

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

2:20 PM

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

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

10.25.2018

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

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

Kirsten Burmester Discusses Tax Cuts and Jobs Act at 8th Annual NABE Transfer Pricing Symposium
10:30 AM to 12:00 PM
07.18.2018

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

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

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

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

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

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

Clark Armitage Discusses 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

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

05.10.2018

Elizabeth Stevens Explores CoGS at ABA May Meeting

12:45 PM

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

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

Arianna Caldwell to Moderate Panel on Subpart F Tax at ABA Tax Section 2017 Midyear Meeting
4:00 PM - 5:00 PM
01.19.2017

Elizabeth Stevens to Moderate Panel on Transfer Pricing Litigation at ABA Tax Section 2017 Midyear Meeting
4:00 PM
01.19.2017

Clark Armitage to Speak on Transfer Pricing Litigation at ABA Tax Section 2017 Midyear Meeting
4:00 PM
01.19.2017

David Rosenbloom to Speak on the Role of "Fairness" in International Tax Policy at GWU-IRS International Tax Conference
8:00 AM - 9:00 AM
12.16.2016

Rachel Partain, Charles Ruchelman, Christopher Rizek, and Mark Allison to Speak on Captive Insurance at Bloomberg BNA Webinar
12:00 PM to 1:00 PM ET
12.09.2016

David Rosenbloom to Speak on Investment and Tax at Resilience Conference Berlin
11.30.2016

David Rosenbloom to Speak on State Aid Controversy at International Tax Institute Seminar
12:15 PM to 2:00 PM
11.17.2016

David Rosenbloom to Speak on International Tax at KPMG Event
12:30 PM - 1:25 PM
11.15.2016

Mark Allison to Speak on Hot Audit/Controversy Issues at NYU 75th Institute on Federal Taxation
11.15.2016

Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation
11.13.2016

Peter Barnes to Speak on BEPS at 27th Annual Philadelphia Tax Conference
8:30 AM - 9:40 AM
11.03.2016

Scott Michel and Mark Allison to Speak on IRS Representation Tools, Techniques And Defensive Strategies at NYU 75th Institute on Federal Taxation
10.23.2016

Mark Allison to Speak on Hot Audit/Controversy Issues at NYU 75th Institute on Federal Taxation
10.23.2016

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

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

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

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

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 Speak on Court Procedure and Practice Panel
05.08.2015

Mark Allison to Chair Court Procedure and Practice Roundtable Discussion
05.08.2015

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

Clark Armitage to Moderate Current TP Litigation Panel
04.23.2015

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

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

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

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

Clark Armitage to Speak at TP Minds Americas 2015
02.23.2015

Clark Armitage to Speak at FEI Committee on Taxation Meeting
02.20.2015

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

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

Neal Kochman to Speak on Transfer Pricing Panel
01.30.2015

Mark Allison to Speak on Court Procedure and Practice Panel
01.30.2015

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

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

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

Patricia Lewis to Moderate Transfer Pricing Panel
09.19.2014

Mark Allison to Chair Court Procedure and Practice Discussion
09.19.2014

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

David Rosenbloom to Speak on International Taxation
08.22.2014

David Rosenbloom to Speak at First International Tax Forum
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

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

Peter Barnes to Speak at International Tax Reform Event
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

Clark Armitage to Speak at ABA May Meeting
05.09.2014

Mark Allison to Moderate Roundtable Discussion at ABA May Meeting
05.09.2014

Mark Allison to Chair Court Procedure & Practice Committee
05.09.2014

Mark Allison to Chair Roundtable Discussion at ABA May Meeting
05.09.2014

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 Speak on Transfer Pricings and BEPs at International Tax Conference
12.07.2013

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

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

Peter Barnes to Speak at the Tax Academy of Singapore
11.18.2013

Peter Barnes to Speak at IFA Triangle Luncheon Seminar
11.12.2013

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

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

Stafford Smiley to Speak at Moscow State Law Academy
10.25.2013

Stafford Smiley Speaks On Tax Reform at the Russian IFA
10.23.2013

Mark Allison Chairs TEFRA Panel at ABA Meeting
10.18.2013

Mark Allison Discusses International Tax Best Practices
10.18.2013

Mark Allison Discusses Tax Shelter Cases
10.18.2013

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

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

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



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

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

H. David Rosenbloom Presents Lecture Series in Italy
05.06.2013

Clark Armitage Discusses Transfer Pricing Developments
05.01.2013

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

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-ACTL US International Taxation Conference: Issues For The Years Ahead
10.23.2012

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

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

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

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

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

Mark Allison to Speak on Motions in Limine
05.11.2012

Mark Allison to Speak on Federal Tax Disputes
05.01.2012

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

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

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

Mark Allison Discusses Tax Litigation Trends
01.19.2012

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

Patricia Lewis to Chair Panel on Transfer Pricing Enforcement
12.15.2011

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

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

FBAR for the Fiduciary
10.18.2011

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

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

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

Clark Armitage to Speak on APA Issues
08.01.2011

Circular 230 Important Revisions
02.23.2011

Mark Allison Moderates Panel on Material Advisor Litigation
01.21.2011

Mark Allison to Speak on Section 6700 Litigation
01.21.2011

David Rosenbloom to Speak on Competent Authority Panel
12.09.2010

Richard Skillman to Speak on Executive Compensation
11.18.2010

David Rosenbloom to Speak on The UBS Saga
11.18.2010

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

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

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

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

The Foreign Account Tax Compliance Act in 2010 Explored
08.05.2010

Patricia Lewis to Discuss APAs at National Conference
06.21.2010

Clark Armitage Discusses Dispute Resolution
04.01.2010

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

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

Clark Armitage Speaks on the APA Process
03.01.2010

Mark Allison Discusses Tax Court Procedures at ABA Conference
01.11.2010

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

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

Clark Armitage Covers Competent Authority at Canadian Conference
11.01.2009

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

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

Patricia Lewis to Discuss Korea's Approach to APAs
10.15.2009

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

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

Mark Allison Chairs Statute of Limitations Panel
09.10.2009

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

Clark Armitage Discusses APA and Competent at Training Program
07.01.2009

Mark Allison Chairs Transferee Liability Panel at ABA Conference
01.10.2009

Mark Allison Discusses Jury Trials at ABA Event
09.10.2008

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

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

Mark Allison Talks Cross-Border Discovery at ABA Program
09.10.2007

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

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

Mark Allison Discusses Tax Shelter Litigation Trends at ABA Program
02.10.2006

Mark Allison Speaks on Expert Witnesses at ABA Conference
09.10.2004

PUBLICATIONS

Is ICAP a Viable Alternative to APAs?
Article | *IBFD International Transfer Pricing Journal*, 10.31.2023

Financier Worldwide Indepth Feature: Global Tax 2023
Article | *Financier Worldwide Magazine*, 10.06.2023

Turning Point: A Century of International Tax Policy Flies toward a Sharp Curve
IBFD Bulletin for International Taxation, 09.05.2023

Pillar Two Questions for the U.S. Can Result in Positive Answers
Article | *Bloomberg Law*, 08.22.2023

The Supreme Court Will Review the Constitutionality of Section 965 in *Moore v. United States*; Should Taxpayers Who Paid the Tax Seek a Refund?
Tax Alert | 07.24.2023

There's Still Time, But It's of the Essence
Structuring into an Exemption from the New Beneficial Ownership Information Reporting Requirements
Business, Investment & Transactional Tax Alert | 07.18.2023

The IRS Announces 100 Criminal and Civil Audits of Puerto Rico Act 20, 22, and 60 Decree Holders
International Tax Alert | 07.17.2023

The Unhelpful Myth of Tax Certainty OECD International
IBFD Talking Points, 06.14.2023

No Time for Waiting
Article | *Tax Notes Today International Letter to the Editor*, 05.22.2023

Financier Worldwide Indepth Feature: Transfer Pricing 2023

Article | *Financier Worldwide Magazine*, 04.27.2023

Defending Your Puerto Rico Source Income in an IRS Campaign Audit

International Tax Alert | 03.10.2023

All or Nothing: Defending Your Puerto Rico *Bona Fide* Residency Against an IRS Campaign Audit

International Tax Alert | 02.17.2023

Preparing for Battle: The IRS Puerto Rico Campaign Takes Off

International Tax Alert | 02.01.2023

Financier Worldwide Roundtable: Transfer Pricing

Article | *Financier Worldwide Magazine*, 01.25.2023

Pillar One and Pillar Two: The Well-Intentioned (But Unfortunate) Pursuit of Perfection

Article | *Belt and Road Initiative Tax Journal*, 01.11.2023

Time for a Tax Treaty Timeout

Article | *Tax Notes Today International*, 01.03.2023

IRS Takes Aim at Law Firms' Deferred Payment Arrangements for Contingency Cases

Tax Alert | 12.28.2022

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

Financier Worldwide Annual Review: Global Tax 2021 – United States

Article | *Financier Worldwide*, 10.25.2021

VIEWPOINT *Toulouse*: No Treaty-Based Credit?

Article | *Tax Notes International*, 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 Fuisset": 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

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

FDII Documentation Requirements Relaxed
International Tax Alert | 07.20.2020

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

New Regulations Change Allocation of Partnership Liabilities

Article | *Global Tax Weekly*, 11.03.2016

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

Tax Alert | 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

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