

## Elizabeth Stevens Comments on Proposed Changes to GILTI Tax in Law360

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*Law360*

A proposal from Senate Democrats to use existing U.S. Treasury regulations to enhance the tax on global intangible low-taxed income could reduce administrative complexity, but likely won't avoid all potential compliance and enforcement headaches with the proposal.

...

"I think transfer pricing is an issue for either of these options for implementing country-by-country GILTI," said Elizabeth Stevens of Caplin & Drysdale. "It's probably more significant for the high-tax exclusion option, because you'll have a cliff effect at the threshold between high tax and low tax."

To view the full article, please visit *Law360's* website (subscription required).

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