

Law360 Quotes Clark Armitage on OECD Global Tax Plan

10.10.2019

Law360 Tax Authority

After releasing new details about its proposed sales-based global taxing rules, the OECD will now need to determine which companies they apply to — which will likely be a contentious process as negotiators target consumer-focused industries and fine-tune exceptions.

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“Aren't all companies ultimately consumer-facing, in a sense?” asked Clark Armitage of Caplin & Drysdale. “Someone uses their product, and then sells it to a consumer, or uses it to produce consumer goods. There's a line somewhere; I'm not sure exactly where it is.”

...

“Some level of marketing spending, brand development spending, something that crosses a threshold where it's likely to produce some intangible profit,” Armitage said. “All companies market, but do they do it to develop a brand? How do you decide which is which?”

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

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