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Practical Guide to U.S. Taxation of International Transactions

Robert J. Misey, Jr. | Michael S. Schadewald



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government The role of a tax adviser on an business acquisition transaction is to make everyone aware that there are two silent partners in the room at all times and that the Buyer and Seller have a common interest in cutting the silent partners out of the deal or reducing their take The purpose and mission of Practical Guide to Mergers Acquisitions and Business Sales is to teach practitioners and business stakeholders how to pare the tax costs of transactions to the absolute minimum within the boundaries of ethical and appropriate tax reporting Publisher s website [Transfer Pricing Rules and Compliance Handbook](#) Marc M. Levey, Steven C. Wrappe, Kerwin Chung, 2006 This book gives an overview of the basic principles of transfer pricing and U S transfer pricing rules and the impact of transfer pricing on other issues such as customs valuation Section 404 of the Sarbanes Oxley Act of 2002 and FASB Interpretation no 48 [Tax Planning for U.S. MNCs with EU Holding Companies](#) Pia Dorfmueller, 2003 Tax planning for U S companies doing business in the EU Analyses the design of tax conversion and deferral structures that are advantageous to U S multinationals to reach their goals minimizing liability maximizing credits deducting expenses and utilizing losses using tools such as routing of income and classification of entities and overcoming barriers like the CFC provisions of the U S tax law Examines U S federal corporate law and analyses European company taxation with specific tax planning techniques for Germany France the Netherlands Belgium Austria Denmark Ireland Spain Luxembourg and Switzerland **Taxation of Cross-border Partnerships** Jesper Barenfeld, 2005 Aims to identify and analyse problems related to double taxation of income attributable to cross border partnerships in asymmetrical situations de lege lata This refers to cases where the same partnership in across border owner entity situation is recognized as a taxable person in one country but as transparent for tax purposes in the other *Searching the Law, 3d Edition* Frank Bae, Edward Bander, Francis Doyle, Joel Fishman, Paul Richert, 2021-12-13 [Federal Tax Articles](#) , 1992 **The Journal of International Taxation** , 1996 **A Practical Guide to U.S. Taxation of Overseas Americans** Thomas E. Johnson, 1977 **Journal of International Accounting, Auditing & Taxation** , 2000 *Federal Taxation* Robert E. Meldman, Richard J. Sideman, 1998 *Oil and Gas Law in Kazakhstan* Ilias Bantekas, John Paterson, Maidan Suleimanov, Ma?dan Kontuarovich Sule?menov, 2004-01-01 Central Asia has emerged as potentially the most important new hydrocarbon province in decades Among the countries whose natural resources are now the focus of world attention Kazakhstan is very much in the front rank The scale and strategic importance of its reserves mean that it is set to become one of the key players in the global market Realising that potential depends on many factors not least its legal treatment of the oil and gas industry The contributors to this volume consider the various dimensions of that legal treatment including investment and contractual issues dispute settlement transport and refining environmental issues and taxation The importance of the international context for Kazakhstan s domestic law is a key feature of this book as is a concern with identifying existing problems and suggesting the most fruitful direction for reform The book will be of interest to practitioners and academics working in the specific field as well as in the more general area of legal relations between the oil

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