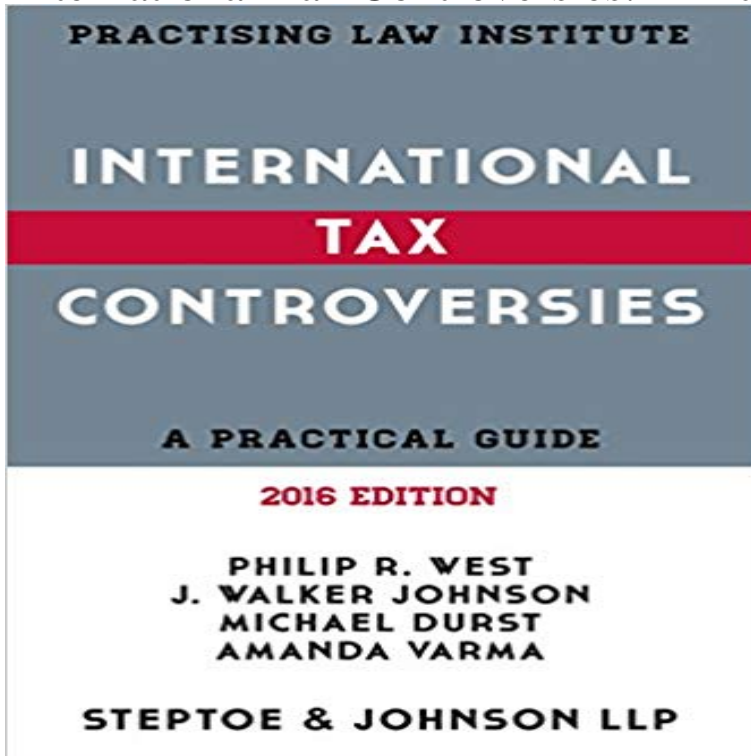


International Tax Controversies: A Practical Guide - 2016 Edition



With the U.S. Justice Department taking an ever-closer look at cross-border transactions and their tax implications, the new International Tax Controversies: A Practical Guide provides a detailed roadmap to how to prepare for a tax audit that involves an international component. Creating and retaining the proper transaction-related documentation, and understanding what additional documentation might be needed for an international examination, is vital to a successful audit. International Tax Controversies describes the process of how an international audit proceeds, including providing information on: How the IRS audit team is chosen What the limits are of the scope of the examination The type of examination that will be conducted and the kinds of documents that will need to be provided by the taxpayer and third parties The kinds of enforcement procedures that may be brought In international tax situations, there are often conflicting positions taken by the U.S. Internal Revenue Service and a non-U.S. tax authority. Tax treaties containing mutual agreement procedures (MAPs) are often invoked to protect the taxpayer from paying double taxes. International Tax Controversies describes the process by which MAPs may be invoked and a binding resolution created. As most disagreements between international taxing entities involve transfer pricing issues, there is generally an opportunity to obtain an advance pricing agreement (APA) to protect the taxpayer. International Tax Controversies analyzes the APA process, providing a detailed guide on facilitating the process for your client. It also describes the many tax information exchange treaties and agreements that the U.S. has entered into, and the impact they have had on the U.S. taxpayer.

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