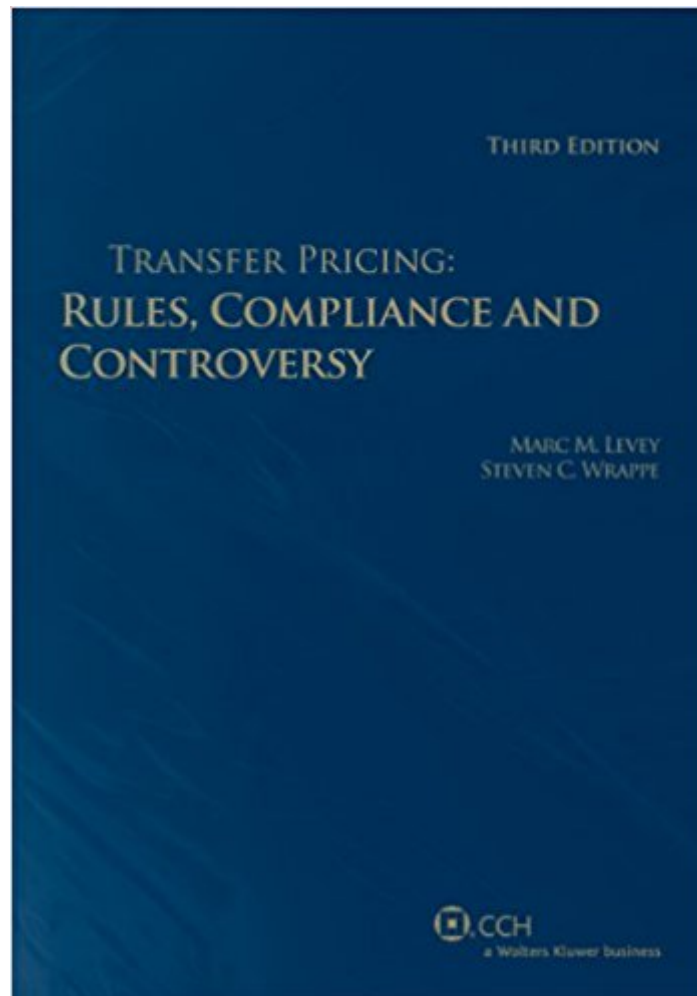




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Transfer Pricing: Rules, Compliance And Controversy (Third Edition)



Synopsis

Transfer pricing is one of the most significant tax issues for corporations having international operations. It attracts the scrutiny of tax authorities worldwide and continues to draw attention of more and more countries' tax legislatures. Because of the heavy impact of income allocations on the bottom line of a corporation's business, especially potentially forced ones, international tax and business professionals need to be very careful about their tax planning and compliance efforts in order to meet the established transfer pricing standards. *Transfer Pricing: Rules, Compliance and Controversy* offers extensive yet clear guidance through the complex maze of U.S. transfer pricing rules. The book is authored by leading experts in the transfer pricing scene. Throughout the book, the authors cover all aspects of transfer pricing relevant to the practitioner, starting with general legal principles and apportionment methods, then moving on to more specific subjects such as transfers of tangible vs. intangible goods and the impact of e-commerce and U.S. customs on transfer pricing, and finally exploring highly practical matters like procedural strategies and post-examination procedures.

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Marc M. Levey and Steven C. Wrappe Marc M. Levey, partner with the New York office of Baker & McKenzie, is a nationally recognized expert in international taxation, particularly in structuring and defending transfer pricing strategies. Acknowledged by *Euromoney* magazine as one of the "Leading U.S. Tax Attorneys" and by the *International Tax Review* as one of the "World's Leading Transfer Pricing Advisors," his practice emphasizes transfer pricing and cross-border transactions,

tax controversies and litigation, and general corporate and partnership taxation. Steven C. Wrappe is a principal in Ernst & Young LLP's Washington, DC Transfer Pricing practice. He has over 25 years of tax experience, including over 15 years of specialization in all aspects of transfer pricing across a broad cross-section of industries. Mr. Wrappe's experience in transfer pricing controversy includes: examination, appeals, ADR solutions, advance pricing agreements, mutual agreement procedures and customs agreements. His combined APA/MAP experience is well in excess of 100 cases.

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