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Fifth Edition



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# Taxation Of International Transactions Casebook 2nd

**Michael D. Rose**



## **Taxation Of International Transactions Casebook 2nd:**

Taxation of International Transactions ROBERT J. BROWN PERONI (KAREN B. FLEMING, J. CLIFTON.), Karen Brown, J. Fleming, 2021-07-06 Designed for use in law schools business schools and schools of management this significantly revised casebook formerly Gustafson Peroni and Pugh s *Taxation of International Transactions* outlines the determination of U S income tax liabilities resulting from international transactions and the issues attending administration of the U S international tax rules Textual discussion cases rulings and problems guide students through the basic tax considerations that confront foreign individuals and entities participating in the U S economy as well as those confronting U S individuals and entities seeking to derive income abroad It covers both the U S tax rules applicable to international transactions and the tax policy considerations underlying those rules This book fully covers all the significant provisions of the Tax Cuts and Jobs Act of 2017 and subsequent regulatory and administrative guidance regarding those provisions including the revised foreign tax credit limitations the participation exemption system in Section 245A and the GILTI and FDII provisions *Federal Taxation of International Transactions* Richard L. Kaplan, 1988 Monograph intended for teaching law students to the federal income taxation of international transactions Attention is given to tax policy considerations political as well as economic ramifications and alternative statutory formulations

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