

U.S. International Tax Planning And Policy (Carolina Academic Press Law Casebook)



This book addresses the provisions of the Internal Revenue Code that govern the U.S. operations of foreign persons (i.e., inbound transactions) and the foreign operations of U.S. persons (i.e., outbound transactions). Part I provides a general introduction and introduces the impact of tax treaties; Part II focuses on the taxation of inbound transactions; Part III focuses on outbound transactions; and Part IV focuses on cross-border mergers, acquisitions and joint ventures. The last sections of most chapters briefly discuss the manner in which South Africa, which has recently reformed its international tax system, addresses the issues presented in the chapter. From a tax planning standpoint, the U.S. tax advisor should have a basic understanding of the interface between the U.S. and foreign tax system involved in the transaction, and these discussions illustrate the interface between two sophisticated systems.

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