

The State of the OZs Examined In Two National Reports

July 20, 2020

Opportunity Zone Magazine

Comments on Recent Guidance from the Department of Treasury (“Treasury”) and Internal Revenue Service (“IRS”) Regarding Opportunity Zones

July 1, 2019

Boston University School of Law's Graduate Tax Program

Cuts Will Impact Blue States, Real Estate Industry

December 12, 2018

Banker & Tradesman

The Tax Plan: A Comprehensive Visual Breakdown

December 21, 2017

Wealth Management

Building the New Berlin Wall: Treasury's Anti-Inversion Regulations

May 1, 2016

Business Entities

The Long Goodbye

April 15, 2016

World Trade Executive

Eating The Seed Corn: Congress Proposes Repealing Section 1031

November 23, 2015

Banker & Tradesman

Living and Dying with an LLC

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CEOWORLD Magazine

How Like-Kind Exchanges Make The IRS Rich

May 18, 2015

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To Repeal or Retain Section 1031: A Tempest in a \$6 Billion Teapot

April 1, 2015

Section of Taxation: News Quarterly

Inverted Priorities: Why the Proposed Treasury Rules are Unlikely to Stop Inversion Transactions

October 7, 2014

Practical International Tax Strategies

Tax-Free Exchanges Of Art, Airplanes, Alcohol Flourish

September 8, 2014

Banker & Tradesman

Like-Kind and Loving It: Tax-Free Exchanges of Art, Airplanes, Alcohol Flourish

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You Don't Think Federal Tax Law Is Funny? Think Again

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Cognoscenti (WBUR)

Property, Currency And Semantics Aside- My Bet is on Bitcoin

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Federal Income Taxes Are Rising Dramatically in 2013

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Fifth Protocol Follies: How the Canadian Revenue Agency Cleverly Circumvented the U.S.-Canadian Tax Treaty to Preserve the Beloved NSULC

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Ireland Announces it will Bar "Stateless" Companies: Will the Irish Take a Bigger (Tax) Bite Out of Apple?

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Thomson Reuters - Practical European Tax Strategies

Richard III: Exhuming His Remains, And His Reputation

February 8, 2013

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We Gotta Get Out of This Place: Strategies for Addressing the U.S. Expatriation Tax

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Is Economic Substance a Kind of Tax Porn? IRS Adopts a 'Don't Ask, Won't Tell' Policy

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Man Bites Dog: Obama Proposes a Corporate Tax Rate Reduction

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The FATCA Fiasco: Are We Having Fun Yet?

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Breaking Up Is Hard To Do: Divorcing Your Tax Jurisdiction Can Trigger Painful “Alimony” Taxes

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Ruby, Don’t Take Your Love to Town or Your Intangibles Offshore

May 15, 2010

Thompson Reuters/World Trade Executive International Finance & Treasury

The IRS Gets Jealous: Oh, Ruby, Don’t Take Your Love to Town or Your Intangibles Out of the Country

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Worker Classification: A Checkered History

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Proposed Tax Changes in 2011 Budget: Focus on Business-Related Measures

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Planning Perspective

W2 vs 1099: It Gets Even Worse: Employee or Subcontractor? Companies Need a Little Help From the IRS

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IRS Commissioner Gets the Drop on a Tax Lunch Crowd: "Sheriff" Shulman Decides to Deputize Taxpayers to Catch Themselves

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Acquisitions in the Valley of the Shadow of Death: How to Purchase—and Resurrect—an Almost-Dead Company

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Cyprus--Back to the Future: Cyprus, an Ancient Trading Center, has become a Glitzy New Presence on the International Tax Stage

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The Forward Triangular Merger: A Not-So-Straight-Forward Transaction

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Obama Gets Tongue-Tied Over Taxes: The Administration Offers Its Long Awaited International Tax Proposals

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International Corporate Restructurings: A Multinational Tax Shopper's Guide to Code § 367(b) and Code § 1248

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SPOTLIGHT Q&A with Professor Darby, Tax Writer of the Year

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The King of Quotes: The Story Behind Yogi Berra's Tangled Logic

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The IRS Fixes Subpart F-Sort Of

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International Tax Structuring Using Dutch Cooperatives: Absence of Withholding Tax Makes Structure Attractive as a Holding Company

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The Pot Calling the Pot Black: Congress Points a Finger at the Internal Revenue Code (and Itself)

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When Tax Planning Rocks: How the Rolling Stones Went Dutch to Cut Taxes—The Untold Story of a "World Famous Accountant" named Mick Jagger

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Attack (by U.S.) on the "Killer B": IRS Puts the Sting on Offshore Triangular Reorganizations

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As the World Churns: Avoiding Tax Planning Disaster by Steering Around Section 197's Anti-Churning Rules: Trap for the Unwary

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An Intimate Look at Arms' Length: Trying to Grasp the "Investor Model" in the Proposed Cost-Sharing Regulations

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International Tax Planning Double Irish More than Doubles the Tax Saving: Hybrid Structure Reduces Irish, U.S. and Worldwide Taxation

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At Ease: Twelve Rules for Surviving an IRS Audit: In the Battle of Survival, You Need to Think Army

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The Tax Man Cometh: The IRS is Back in Business with Aggressive Enforcement of the Tax Laws

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What You "C" is What You Get: When Using a C Corporation Makes Sense in a Start-Up Business

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Fantasy Island: The Day the Internal Revenue Code Was Abolished by the DC Circuit Court of Appeals

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Acquiring IP: Getting Tangible Results from Intangible Assets

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Taking Stock – or Assets. Considerations When Structuring an Acquisition of a C Corporation

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Where to Park Your Intellectual Property
Considerations involve Subpart F, Check-the-Box, TIPRA and PFIC Rules, Among Others

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Commissionaire Agreements are an Important Tool in International Tax Planning

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Reducing Tax Liability through Commissionaire Agreements: Important Tool in International Tax Planning

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Changes to Subpart F are Favorable to International Business Operations of US Companies

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Unwinding After a Bad Day: When Undoing the Deal is The Best Tax Solution

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Everyone Goes to Zug: Tax Planners Benefit as Swiss Cantons Compete for Lowest Tax Rates

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Cost Segregation Studies: The Good, the Bad and the Ugly

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Eat Your Cake and Have a 338(h)(10) Election Too

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Dutch Treat: How the Netherlands has Prospered by Offering Attractive Tax Planning Opportunities

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Quarterbacking your Business Using 1031 Exchanges: Like-kind Exchanges Can Avoid Gains

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Luck of the Irish: How Shrewd Tax Policies Have Stimulated Economic Growth

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When Tenant in Common Structures Make Sense

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The Creative Genius Called the IRS

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Finding Opportunities in Tenant-in-Common Offerings

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A Whole New Ballgame

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Same Sex Marriages Create a Whole New Ball Game

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Are FLPs on the Road to Oblivion?

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Tax Relief Act is a Boon for VC

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Planning After the 2003 Tax Act

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Sound Rationale

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Licensing Technology Can be a Capital (Gains) Idea for Your Company

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Double Trouble

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Dividend Taxes, C Corporations and Other Bone-headed Tax Policies

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Bush's Proposal Is a Smart Move for Dumb Policy

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Sending Your Hard-Earned Money On a Well-Deserved Vacation
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Luck of the Patriots
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Genetic Testing of Employees: Putting the gene(ie) back in the bottle

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Yankees Rule!

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Tax Law after Jester's Heart

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Five Maxims for Taking Your Vacation

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If It's Tuesday, Which State Gets Your Tax Dollars?

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Drafting “Click Wrap” Agreements

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To Be or Not to Be...Your Own Tax Preparer

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In and Out

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Making the Home Office Deduction Work for You

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Good Week Could Have Been Better

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