

**NEW  
Offering!**

## Transfer Pricing Portfolios Library

*Expert guidance and other resources for helping multinational corporations manage transfer pricing tax compliance*

Written by leading practitioners in this highly complex and constantly evolving practice area, **Tax Management Transfer Pricing Portfolios** provide everything necessary to manage intercompany prices to avoid penalties as they exchange goods or services between related companies located in different countries.

### Expert Analysis

These in-depth portfolios offer plain-English guidance you can follow with confidence as you address general principles of transfer pricing and apply them to specific businesses, scenarios, and countries.

Portfolio topics include:

- Introduction to Transfer Pricing
- Section 482 Regulations and Rulings
- Judicial Decisions, Strategy and Outcomes
- Economic, Managerial and Accounting Principles
- Transfer Pricing Records and Information
- Alternative Practical Strategies in Transfer Pricing
- Section 6662 Transfer Pricing Penalties
- Advance Pricing Agreements
- Cost-sharing Arrangements
- Transfer Pricing Rules of France, United Kingdom, Germany, Denmark, Belgium, Italy, Sweden, Switzerland, Canada, Mexico, Japan, Korea, Australia, and Brazil
- OECD Transfer Pricing Rules and Guidelines

### Source Documents

#### Laws and Regulations

- Internal Revenue Code
- Treasury Regulations
- Proposed Regulations
- Tax Legislation
- Tax Treaties

#### Agency Documents

- Treasury Decision Preambles
- IRS Documents
- IRS Publications
- Circular 230
- CIPs/ISP Papers

#### Cases

- Federal Tax Cases
- Tax Court Rules
- Court of Federal Claims Rules

### News and Commentary

Stay alert to how transfer pricing developments create new issues for your clients – and new tax and accounting issues for you.

Your *Transfer Pricing Portfolios Library* includes:

- **Transfer Pricing Report** – Biweekly reporting, analysis and commentary of transfer pricing developments worldwide, plus timely notification of proposed relevant US and international regulations, legislation and court decisions.
- **Transfer Pricing Special Reports** – Top international practitioners examine issues such as how to build a transfer pricing defense and address offshored business challenges, and take you inside specific countries' transfer pricing rules, audit practices, information requests, and more.
- **International Journal** – Monthly analysis and commentary by distinguished international tax practitioners on cases, rulings tax treaties and more.
- **International Insights and Commentary** – Practitioner-written analysis provides insight on emerging trends in taxation.
- **International Tax Monitor\*** – Daily news and analysis on global tax and accounting developments affecting transnational enterprises.
- **Tax Planning International Transfer Pricing\*** – Expert analysis on economic, taxation and emerging legislative and regulatory developments affect transfer pricing strategies worldwide.

### Practice Tools

Time-saving aids developed in today's best real-world practices, and ready for your staff to use:

- Federal Tax Calendar
- Working Papers
- Tables, Charts and Lists

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Michael Gershon, CPA  
Tax Director

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Former government officials, practitioners and partners with top law and accounting firms, and educators provide valuable insights and proven guidance for handling the tax and accounting issues that arise in your practice.

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Ready-to-use sample plans, documents, forms, and other resources created and used by real world practitioners save you time and money and provide practice-building tools.

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