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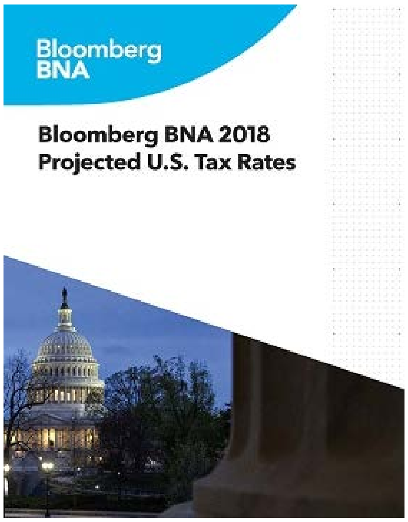
Bloomberg BNA

WHAT'S NEW
September 2017

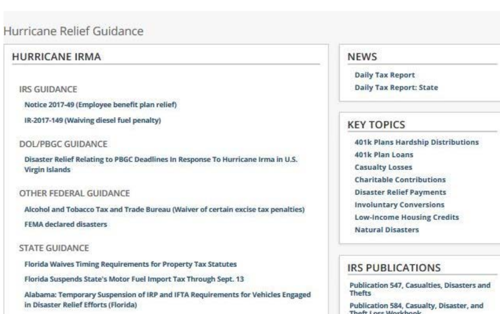
Now Available! 2018 Projected U.S. Tax Rates



Jumpstart your 2018 tax year planning with Bloomberg BNA's **2018 Projected U.S. Tax Rates**. You have free access to the report — simply click on the link below or find it under the **Special Reports** section in *Bloomberg BNA Tax and Accounting*.

DOWNLOAD SPECIAL REPORT

New! Hurricane Relief Guidance

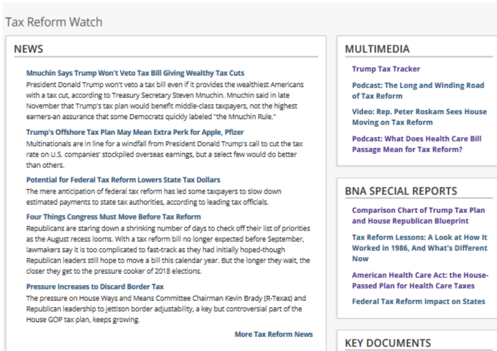


Bloomberg BNA has just launched a new **Hurricane Relief Guidance** page to highlight essential tax news, developments, and documents related to hurricane relief — all in one place and continuously updated. Now appearing on the Federal Tab of *Bloomberg BNA Tax & Accounting* in a new "Special Reports" box, **Hurricane Relief Guidance** features IRS Guidance, DOL/PBGC Guidance, State Guidance, special reports, and other essential content.

HURRICANE RELIEF GUIDANCE

Tax Reform Watch

Live on Bloomberg BNA Tax & Accounting



Bloomberg BNA provides daily updates with Tax Reform Watch to highlight the latest developments on tax reform and other major proposals – all in one place! Now appearing on the Federal Tab of *Bloomberg BNA Tax & Accounting*, **Tax Reform Watch** features news, special reports, key documents, videos, podcasts, and other essential content.

VISIT TAX REFORM WATCH NOW

Sign Up for Tax Reform Email News Updates
Get analysis on tax developments straight to your inbox.

REGISTER FOR NEWS UPDATES

New! State Tax: Pass-Through Entity Navigator

The Pass-Through Entity Navigator is a new indispensable research tool, featuring over 1,700 chartable topics. Whether you're seeking guidance on formation, conformity to federal tax classifications, taxes imposed, withholding, or composite returns, you can quickly create short or full answer charts to compare topics by states and find the information you need.

ACCESS THE NAVIGATOR NOW

New! State Tax: Unclaimed Property Navigator

The Unclaimed Property Navigator offers a comprehensive state-by-state look at different topics, including the new coverage of voluntary disclosure agreements, audits, and compliance requirements. All unclaimed property topics are now fully chartable so you can easily make comparisons by state and quickly navigate to each state's unclaimed property laws.

ACCESS THE NAVIGATOR NOW

Treaty Primer

Bloomberg BNA is excited to announce the release of the **Treaty Primer: A Practical Guide to Understanding Income Tax Treaties**. This guide was written by leading practitioners and is available to subscribers who receive the Treaties database as part of their subscription.

GO TO THE TREATY PRIMER

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For live training that includes CPE credit, register for Bloomberg BNA Essentials **here**.

For on-demand training that includes CPE credit, click **here**.

Bloomberg BNA Tax & Accounting Video Tutorials

Discover how to quickly find the information you need on *Bloomberg BNA Tax & Accounting* with quick product video tutorials.

WATCH THE VIDEO TUTORIALS

Bloomberg BNA Tax & Accounting Help Center

The Help Center provides easy-to-follow tips for using *Bloomberg BNA Tax & Accounting*. The self-guided tutorials cover everything from reading the *Tax Management Portfolios*™ to Conducting Searches and accessing source materials.

GO TO THE HELP CENTER

Bloomberg BNA Tax & Accounting Podcasts

Featured Podcast: The Minefields of Estate Planning and Carried Interest

Reporter Allyson Versprille spoke with N. Todd Angkatavanich, David A. Stein, and Andrew Haave of Withers Bergman LLP, authors of the Bloomberg BNA *Tax Management Portfolio™ 875-1st: Wealth Planning with Hedge Fund and Private Equity Fund Interests and Related Section 2701 Issues*, about what practitioners need to know when it comes to navigating carried interest planning under tax code Section 2701, avoiding pitfalls, and understanding the impact of potential tax reform changes.

LISTEN TO THE PODCAST

Talking Tax Podcast Series

Listen to our podcast series covering tax issues from Capitol Hill to the courts and the IRS.

LISTEN TO THE PODCAST SERIES

Congratulations to our Outstanding Author Award Winners in International Taxation

Patrick Marley was this year's recipient of the Silverstein Award in recognition of his longstanding contributions to the field of international tax. The award is named in honor of Leonard L. Silverstein, the founder of the *Tax Management Portfolios*™, for his long standing contributions to the field of tax.

Patrick Marley, a partner in the Toronto office of Osler, Hoskin & Harcourt LLP, advises on tax issues associated with international tax planning, domestic and cross-border mergers and acquisitions, corporate reorganizations, corporate finance and various other tax matters. He has experience representing clients in various industries including financial services, mining, oil and gas, telecommunications, manufacturing, and technology.

Peter Glicklich was recognized as the International Tax Contributor of the Year for multiple contributions to the *Tax Management International Journal* including "Lessons from Canada and the WTO: The U.S. Should Embrace a VAT," "IRS Should Allow QCIV Self-Designation Under FIRPTA," and "Canada's New Approach to U.S. LLPs and LLLPs."

Peter Glicklich is a Managing Partner in New York office of Davies, Ward, Phillips & Vineberg, LLP. He has 30 years of experience counselling corporations, institutional investors, banks, and public and private REITs on their international and corporate tax concerns. He advises on the tax implications of mergers and acquisitions, joint ventures, cross-border financings, restructurings, reorganizations, spinoffs, and intercompany pricing. Glicklich holds a leadership role in the International Fiscal Association and serves on the advisory boards of a number of prominent industry publications.

Ana Claudia Akie Utumi and **Lucas de Lima Carvalho** received the International Tax Portfolio Author of the Year award for their work on *Tax Management Portfolio*™ Business Operations in Brazil.

Ana Claudia Akie Utumi recently formed Utumi Advogados after serving as the head of the Tax practice group at TozziniFreire for 17 years. She has accumulated broad experience in taxation issues in general, including those arising from cross-border deals, such as mergers and acquisitions, financial and capital markets transactions, and other international tax legislation.

Lucas de Lima Carvalho is a Senior Tax Associate at TozziniFreire. He has broad experience in assisting Brazilian and foreign companies on tax matters, specifically international taxation, enrollment for special tax regimes, tax aspects of greenfield operations, as well as of the cross-border trade of goods and services, including transactions in the digital market.

VIEW THE PRESS RELEASE

New and Revised Portfolios

U.S. Income Portfolios

New:

Federal Securities Laws: Executive Compensation Disclosure Rules (307-1st), **Jeremiah G. Garvey, Esq.**, Co-Chair Corporate Section, Buchanan Ingersoll & Rooney PC and **Celia A. Soehner, Esq.**, Morgan, Lewis & Bockius LLP

Section 1411 -- Net Investment Income Tax (511-1st), **David H. Kirk**, Ernst & Young LLP

Tax and ERISA Implications of Employer-Provided Medical and Disability Benefits (330-1st), **Greta E. Cowart**, Winstead PC

Capitalizing a Business Entity: Debt vs. Equity (702-1st), **R. Arnold Handler**, Tax Consultant

Tax Whistleblower Laws and Programs (632-1st), **Erika A. Kelton, Esq., Larry P. Zoglin, Esq., Edward H. Arens, Esq.; Emily A. Stabile, Esq.**, Phillips & Cohen LLP

Revised:

IRS National Office Procedures -- Rulings, Closing Agreements (621-4th), **Lisa Marie Starczewski, Esq.**, Partner, Buchanan Ingersoll & Rooney PC

Transferee Liability (628-4th), **Lisa Marie Starczewski, Esq.**, **Ellen S. Brody** and **Vivek Chandrasekhar**, Roberts & Holland LLP

Accounting for Long-Term Contracts (575-2nd), Annette B. Smith, CPA; Dennis L. Tingey, J.D., CPA; Christine M. Turgeon, CPA, PricewaterhouseCoopers, LLP

Bankruptcy and Insolvency Restructurings; Discharge of Indebtedness (540-4th), **Max A. Goodman, Esq.**, Milbank, Tweed, Hadley & McCloy LLP; **Mark Hoenig, Esq.**, Weil, Gotshal & Manges LLP

Section 199: Deduction Relating to Income Attributable to Domestic Production Activities (510-3rd) **Beth M. Benko, Esq., C.P.A.; Connie Cheng, C.P.A.**, BDO USA, LLP

Age, Sex, and Disability Discrimination in Employee Benefit Plans (363-5th) **Kris D. Meade, Esq., Glenn D. Grant, Esq., Andrew W. Bagley, Esq., Rebecca L. Springer, Esq., Laura Offenbacher Aradi, Esq.**, Crowell & Moring LLP; **Joel D. Wood, Esq.**, Groom Law Group, Chartered

Responsible Person and Lender Liability for Trust Fund Taxes – Sections 6672 and 3505 (639-4th) **Juan F. Vasquez, Jr., Peter A. Lowy, Chamberlain, Hrdlicka**, White, Williams & Aughtry

Tax Aspects of Restructuring Financially Troubled Businesses (541-5th)
Candace A. Ridgway, Colleen E. Laduzinski, Patrick O'Brien, Benjamin S. Jacobs, Jones Day

Estates, Gifts, and Trusts
New:

Section 1411 -- Net Investment Income Tax (873-1st), **David H. Kirk**, Ernst & Young LLP

Revised:

Managing Fiduciary Liability (857-2nd), **Richard M. Horwood, Esq.**, Horwood Marcus & Berk, Chartered; **Lauren J. Wolven, J.D.**, Levenfeld Pearlstein, LLC; **Jeffrey A. Zaluda, Esq.**, Horwood Marcus & Berk, Chartered

Dynasty Trusts (838-2nd), **Christopher P. Cline, Esq.**, Riverview Trust Company

Community Property: General Considerations (802-3rd), **Gerald B. Treacy, Esq.**, Treacy Law Group, P.L.L.C.

Foreign Income Portfolios
New:

Business Operations in the Baltic States (7025), **Jesse Kivisaari** and **Tõnu Kolts** COBALT, Tallinn, Estonia; **Zinta Jansons** and **Zane Akermane**, Ellex Klavins Riga, Latvia; **Gintaras Balcius**, Ellex Valiunas, Vilnius, Lithuania

Business Operations in the European Union – Regulatory (7451-1st), **Howard M. Liebman, Esq., Renato Antonini, Esq., Bernard Amory, Esq.**, Jones Day; **Filippo Amato**, Head of Trade and Economics Section Delegation of the European Union to the Federal Republic of Nigeria & ECOWAS

Business Operations in Denmark (7100-1st), **Christian Emmeluth, Esq.**, EMBOLEX Advokater

Business Operations in Brazil (7040-1st), **Ana Cláudia Akie Utumi, Esq., Lucas de Lima Carvalho, Esq.**, TozziniFreire Advogados

Transfer Pricing Portfolios

Revised:

Transfer Pricing Rules and Practice in Selected Countries (Q-S) (6970-1st), **Edmund Leow, Esq., Allen Tan, Esq., Peter Tan, Esq.**, Baker & McKenzie. Wong & Leow; **Christopher J. Newman, Esq.**, Ernst & Young Shinnihon Tax; **Wei Kee Ho, Esq.; Michael W. Walter, Esq., Ramón Mullerat, Esq.**, PricewaterhouseCoopers Jurídico y Fiscal, S.L.; **Dr. Lars Samuelson**, Ernst & Young AB; **Richard J. Wuermli, Esq.**, TAX EXPERT International Ltd.

Transfer Pricing Rules and Practice in Select Countries (C-D) (6945-1st), **Nathan Boidman, Esq., Brian Bloom, Esq.**, Davies Ward Phillips & Vineberg LLP; **Luis Coronado, Jessica Tien, Joanne Su**, Ernst & Young; **Patrick Cheung**, Deloitte Touche Tohmatsu; **Christian Emmeluth, Esq.** EMBO LEX Advokater

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As always, we welcome and encourage your feedback. Please send your comments and suggestions to **bnatax@bna.com**.

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