

U.S. International Tax Planning and Policy

U.S. International Tax Planning and Policy

*Including Cross-Border
Mergers and Acquisitions*

SECOND EDITION

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This book is dedicated to:

Samuel C. Thompson, III (Tommy)

(who went from conception to 4 months during the period I was writing the first edition of this book)

and

(who as an 8 and 9 year old, (1) threw his first touchdown pass as a QB on his tackle football team, (2) scored a bunch of points and played fierce D on his basketball team, which was coached by mom, and (3) hit his first home run for his baseball team, all during the period I was writing the second edition of this book and was also proudly serving as an assistant coach on each of those teams)

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Preface

This book addresses the Federal income tax treatment of the economic activities of (1) foreign persons in the U.S. (*i.e.*, inbound transactions), and (2) U.S. persons abroad (*i.e.*, outbound transactions). Part I provides an introduction to general concepts and to income tax treaties; Part II deals with the taxation of inbound transactions; Part III addresses outbound transactions; and Part IV focuses on cross-border mergers and acquisitions, including inversions.

In many chapters the book compares the U.S. approach to the particular issue with the approach taken under the income tax law of South Africa, which has a sophisticated and modern income tax system and an income tax treaty with the U.S.

The book is as a general matter current through June 2016, and supplements will be available periodically on the website of Carolina Academic Press.

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