

International Update Series: Transfer Pricing – Beyond a Tier I Issue



As tax administrators become increasingly aggressive in seeking tax revenues, transfer pricing examinations and litigation are on the rise, both in number and scope. Multinational taxpayers are often caught between different jurisdictions making inconsistent tax claims with respect to the same cross-border transaction that can result in double or even triple taxation.

How can a company's transfer pricing risks be measured and quantified? Does your company comply with the transfer pricing documentation requirements and what are the penalties for valuation misstatements and other noncompliance? Is an advance pricing agreement a useful tool to mitigate your transfer pricing risks? How does your company value its services and intangible assets under cost sharing arrangements? Does your company have systems to avoid duplication and inconsistencies in its documentation from one country to another? Who is a "Competent Authority" and what steps are necessary to defend your company's selection and application of a given transfer pricing methodology?

Please join Jerry Jonckheere, a Partner in the International Tax Services Group of Plante & Moran PLLC, as he discusses:

1. Transfer Pricing – Required Part of Applicable Audits
 - a. Form 5471 and 5472 Reporting
2. A Short Primer – IRC §§ 482 and 6662
3. IRS Audit Activity and Staffing
 - a. Competent Authority – Does This Imply that IRS Employees Not in this Department are Incompetent Authority?
 - b. Advance Pricing Arrangements
4. Case Studies & Current Issues
 - a. Distribution Companies Reporting Losses

Quick Information

Date:

June 25, 2010

Time:

12:00 PM - 1:00 PM

Location:

Join us at any of these Frost Brown Todd offices...

400 Market Street, 32nd Floor
Louisville, KY 40202
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If you are not able to attend at one of our office locations, click on the link below to register for the Webinar on June 25:



<https://www1.gotomeeting.com/register/991549361>

Jerry Jonckheere is an International Tax Partner in the Grand Rapids, MI office of Plante & Moran PLLC. Jerry specializes in international taxation including transfer pricing, foreign tax credit planning, structuring, and mergers and acquisitions and is a member of Plante & Moran's National Tax Office. Jerry has been with Plante & Moran since 2001 after working in Amway Corporation's Tax Division for twelve years and spending six years as a Senior Manager at PricewaterhouseCoopers. Jerry is a graduate of Michigan State University and has an MST from Walsh College. Jerry is active in professional organizations including the AICPA and MACPA, the World Affairs Council and the MSU Club of West Michigan.

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