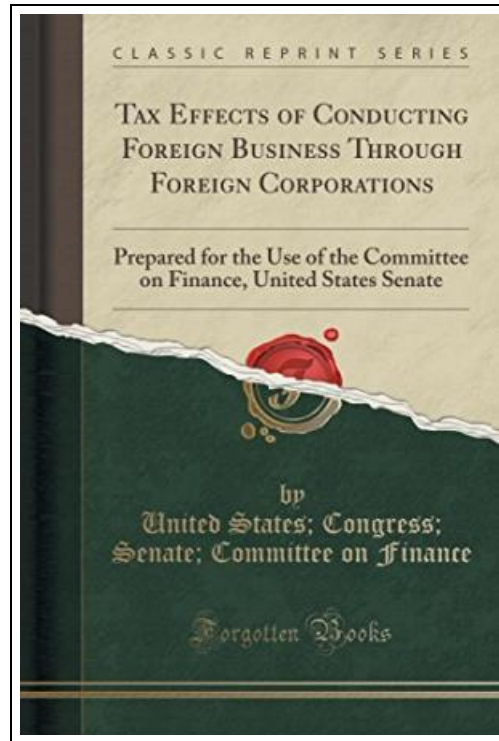


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Forgotten Books, United States, 2015. Paperback. Book Condition: New. 229 x 152 mm. Language: English . Brand New Book ***** Print on Demand *****.Excerpt from Tax Effects of Conducting Foreign Business Through Foreign Corporations: Prepared for the Use of the Committee on Finance, United States Senate This study, which has been prepared for the Committee on Finance, sets forth in section I certain statistics with respect to the Organization of new foreign subsidiaries in which U.S. shareholders have an interest and which are located in various countries of the world, with emphasis on Switzerland. Section II briefly discusses the various commercial and tax reasons for conducting a foreign business through its subsidiary Corporation organized under the laws of one or another foreign country. Section III of the report discusses some of the various types of foreign operations and the rules of present law applicable to those operations. Section IV deals with situations in which a foreign subsidiary is organized in one country but operates in one or more foreign countries. Section V discusses the abuses which do or may occur under present law. For purposes of preparing this study, materials were collected primarily from the Office of International Operations (010), Internal Revenue Service; the recent hearings before the Committee on Ways and Means (May 3-June 9, 1961), relating to the President's tax message; and from various industry groups. Attached to this report, as appendixes, are: (A) The portion of the President's tax message relating to the elimination of the tax-deferral privilege; (B) The Secretary of the Treasury's Statement, to the Committee on Ways and Means relating to the elimination of the tax-deferral privilege; (C) The memorandum of the Commissioner of Internal Revenue, dated June 22, 1961, addressed to the Assistant Secretary of the Treasury; (D) A letter...



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