

TENTH EDITION

PRACTICAL GUIDE TO
U.S. TAXATION
OF INTERNATIONAL
TRANSACTIONS

ROBERT J. MISEY, JR.
MICHAEL S. SCHADEWALD



Wolters Kluwer

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To Monica.

Robert J. Misey, Jr.

To my sons, Doug and Tom.

Michael S. Schadewald

Preface

This book provides the reader with a practical command of the tax issues raised by international transactions and how those issues are resolved by U.S. tax laws. The book emphasizes those areas generally accepted to be essential to tax practice. The book is written primarily as a desk reference for tax practitioners and is organized into four parts. Part I provides an overview of the U.S. system for taxing international transactions and also discusses the U.S. jurisdictional rules and source-of-income rules. Part II explains how the United States taxes the foreign activities of U.S. persons and includes chapters on the foreign tax credit, anti-deferral provisions, foreign currency translation and transactions, export tax benefits, and planning for foreign operations. Part III describes how the United States taxes the U.S. activities of foreign persons, including the taxation of U.S.-source investment income and U.S. trade or business activities, as well as planning for foreign-owned U.S. operations. Finally, Part IV covers issues common to both outbound and inbound activities, including transfer pricing, tax treaties, cross-border mergers and acquisitions, state taxation of international operations, and international tax practice and procedure.

Robert J. Misey, Jr.
Michael S. Schadewald

July 2015

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Michael S. Schadewald, Ph.D., CPA, is on the faculty of the University of Wisconsin-Milwaukee, where he teaches courses in business taxation. A graduate of the University of Minnesota, Professor Schadewald also co-authors the *Multistate Corporate Tax Guide* and writes a column for the *Journal of State Taxation*, both of which are published by Wolters Kluwer, CCH. He has published numerous articles in academic and professional journals, including *The Accounting Review*, *Journal of Accounting Research*, *Contemporary Accounting Research*, *Journal of the American Taxation Association*, *Journal of Taxation*, and *The Tax Adviser*. Professor Schadewald has served on the editorial boards of *Journal of the American Taxation Association*, *International Tax Journal*, *International Journal of Accounting*, *Journal of State Taxation*, *Advances in Accounting Education*, *Issues in Accounting Education*, and *Journal of Accounting Education*. Prior to entering academics, he worked in the Milwaukee office of Arthur Young (now Ernst & Young).

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Robert J. Misey, Jr.

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Michael S. Schadewald

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