

KLUWER LAW INTERNATIONAL

Ceteris

Guide to
International Transfer Pricing
**Law, Tax Planning
and Compliance
Strategies**

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Ceteris

Ceteris provides Transfer Pricing and Business Valuation services to many of the largest multinational companies, top-ranked law and accounting firms and leading government agencies around the world. As an independent firm, Ceteris' advisors are able to seamlessly collaborate with accounting, tax, legal and finance groups while providing objective viewpoints that are unequivocally free from regulatory conflict and independence concerns set forth by the SEC, PCAOB and other governing bodies. Ceteris' experts have considerable experience as both external and in-house advisors, providing clients with technical expertise coupled with well-defined practical solutions incorporating industry best practices with an unrelenting sense of urgency. In 2008 and 2009, Ceteris has been ranked in Inc. Magazine's '500|5000 Fastest Growing Private Companies in America'.

With a global group of advisors spanning the Americas, Europe and Asia, and with offices in the major metropolitan areas of Atlanta, Boston, Calgary, Chicago, Dallas, Los Angeles, Mexico City, New York, Salt Lake City, San Jose, Toronto, and Washington, D.C., and Auckland, New Zealand, Ceteris' extensive network allow for teaming and the provision of tailored services and analyses to comply with all tax jurisdictions.

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He was the National Reporter for the e-commerce topic at the 2001 IFA Congress and a panellist at the 2007 IFA Congress on Cost Sharing Agreements. He is a Board member of the Chartered Institute of Taxation, European Branch. He is a frequent contributor to various French and international tax journals. He is a co-author of two books on transfer pricing published in 2008, *Prix de Transfert*, Editions Francis Lefebvre, and *Transfer Pricing Manual*, BNA. He has been consistently named as a leading French transfer pricing expert by the Legal Media Group's Guide to the World's Leading Transfer Pricing Advisors.

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Green's work covers all aspects of transfer pricing and thin capitalization, including planning and design of transfer pricing policies (on a standalone basis or as part of wider tax planning and/or business change), preparation of compliance documentation, delivering tailored training workshops on transfer pricing to clients' staff, handling disputes/controversy with tax authorities, and negotiating APAs. His clients are primarily FTSE 100 and Fortune 500 companies and other companies of similar size, but also include several professional services firms and medium sized businesses, ranging down to a number of family-owned groups with turnover in the order of GBP 50–100 million. Clients are spread across a wide range of businesses, including professional services, insurance, investment management, consumer goods, online and traditional publishing, fashion, hedge funds, private equity houses, advertising, agriculture, engineering services, IT outsourcing, telecommunications hardware, websites, automotive parts, shipping, chemicals, food products, banking, real estate and freight. Green also works in association with several of the top ten UK law firms and with Ceteris, a transfer pricing specialist firm in North America and Australasia.

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