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# corporate inversions: liabilities and expectations *webinar*

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Spring 2015

Charles Kolstad will be speaking via webinar on, "Corporate Inversions: Liabilities and Expectations."

The U.S. taxes U.S. corporations on their worldwide income, and has among the highest corporate tax rates in the world. This has led to a number of large U.S. corporations engaging in inversion transactions, in an effort to both avoid the U.S. tax on their foreign operations and to shift income to lower tax rate jurisdictions. The current Administration, Congress and the Treasury have all targeted inversion transactions as being abusive. This on-demand webinar focuses on the main provisions of Section 7874, the post-inversion tax planning that often accompanies an inversion transaction, and the ways in which the Treasury and the Administration plan on challenging such transactions.

Learning objectives:

1. Overview of Section 7874
2. Gain Recognition
3. Consequences to the Target U.S. Corporation
4. Post Inversion Tax Planning
5. Recent Transactions
6. IRS Response to Increase in Inversion Transactions
7. What the Future Holds

**More Information & Register**

## **practice areas**

corporate & business transactions

tax and trusts & estates

transactional tax