

High School Physics



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Reviews

Basically no words to clarify. Of course, it is perform, still an amazing and interesting literature. Its been printed in an exceptionally basic way which is only soon after i finished reading through this ebook where actually altered me, change the way i really believe.

(Newton Runolfsson)

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RareBooksClub. Paperback. Book Condition: New. This item is printed on demand. Paperback. 136 pages. Original publisher: Washington : U. S. G. P. O. : For sale by the Supt. of Docs. , U. S. G. P. O. , 2003. OCLC Number: (OCoLC)54031414 Subject: Tax shelters -- United States. Excerpt: . . . 11 14 cluding BLIPS, FLIP, and OPIS. Deutsche Bank has sponsored a Structured Transactions Group that, in 1999, offered an array of tax products to U. S. and European clients seeking to execute tax 15 driven deals or gain mitigation strategies. Internal bank docu-ments indicate that Deutsche Bank was aggressively marketing its tax products to large U. S. corporations and individuals, and 16 planned to close billions of dollars worth of transactions. At least two of the tax products being pushed by Deutsche Bank, BLIPS and the Customized Adjustable Rate Debt Facility (CARDS), were later determined by the IRS to be potentially abusive tax shelters. Another set of issues arising from KPMGs enlistment of other professionals to implement its tax products involves the role played by tax opinion letters. A tax opinion letter, sometimes called a legal opinion letter when issued by a law firm, is intended to provide written advice to a client on whether a particular tax product is permissible under the law and, if challenged by the IRS, how likely it would be that the challenged product would survive court scru-tiny. Traditionally, such opinion letters were supplied by an inde-pendent tax expert with no financial stake in the transaction being evaluated, and an individualized letter was sent to a single client. The mass marketing of tax products to multiple clients, however, has been followed by the mass production of opinion letters by a professional firm that, for each letter sent to a client,...



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