



News, Events & Publications

Daniel V. Stern

Publications

- Co-author, "Treasury Issues Temporary and Final Code Section 385 Regulations," Baker & McKenzie Client Alert, November 2016
- Co-author, Baker & McKenzie Comment Letter on Proposed Section 385 Regulations, July 2016
- Co-author, "Proposed Regulations Under Code Section 385," Baker & McKenzie Client Alert, April 2016
- Author, "New Section 871(m) Dividend Equivalent Regulations Provide a Revised Correlation Test and Delayed Effective Dates," Baker & McKenzie North America Tax Practice Group Newsletter, December 2015
- Co-author, "New Section 956 Regulations Expand Anti-Abuse Provision, Application to Partnerships," Baker & McKenzie North America Tax Practice Group Newsletter, October 2015
- Co-author, "Resolving International Tax Disputes: APAs, Mutual Agreement Procedures, and Arbitration," Tax Management International Journal, September 2012
- Co-author, "Foreign Tax Credit Splitters: Temporary and Final Regulations," Journal of International Taxation, June-July 2012
- Co-author, "Practical Considerations for Sovereign Wealth Funds in Light of the New Section 892 Proposed Regulations," Baker & McKenzie North America Tax Practice Group Newsletter, February 2012
- Author, "Procter & Gamble Washes Away Some Questions Regarding the Extent of the Foreign Tax Credit 'Exhaustion' Requirement," Baker & McKenzie North America Tax Practice Group Newsletter, April 2011
- Co-author, "Senate Foreign Relations Committee Holds Hearing on New Protocols and Treaty," Baker & McKenzie North America Tax Practice Group Newsletter, February 2010
- Co-author, "Private Letter Rulings Provide Guidance on the Application of the Foreign Base Company Sales Income Branch Rule Tax Rate Disparity Test," Baker & McKenzie North America Tax Practice Group Newsletter, December 2009



Presentations

- Co-presenter, "Section 987 Final Regulations," TEI – Baltimore/ Washington Chapter, Falls Church, VA, April 2017
- Co-presenter, "Foreign Currency Developments, Including Guidance under Section 987," Federal Bar Association Tax Law Conference, Washington, DC, March 2017
- Co-presenter, "2016 Corporate Tax Developments: The Year in Review – Subpart F Planning," Bloomberg BNA, New York, NY, December 2016
- Presenter, "Tax Planning for Foreign Currency," Baker & McKenzie Tax Planning and Transactions Training, Seattle, WA, November 2016
- Presenter, "Intermediate U.S. International Tax Update – Foreign Tax Credits," Bloomberg BNA, Raleigh, NC, November 2016
- Presenter, "Understanding the Source Rules for Determining Foreign Source Income," Bloomberg BNA, Dallas, TX, May 2016
- Co-presenter, "A Busy Year for Subchapter C," Baker & McKenzie Tax Planning and Transactions Workshop, New York, NY, March 2016
- Co-presenter, "Current U.S. Tax Planning for Foreign-Controlled (Inbound) Companies – U.S. Income Tax and Treaty Aspects of Doing Business in the United States," Bloomberg BNA, New York, NY, October 2015
- Co-presenter, "Why Currency Matters," Baker & McKenzie Tax Planning and Transactions Workshop, New York, NY, April 2015
- Co-presenter, "2014 Corporate Tax Developments: The Year in Review – Subpart F Planning," Bloomberg BNA, New York, NY, November 2014
- Co-presenter, "U.S. International Tax Planning – Tax-Free International Mergers and Acquisitions Under Sec. 367," Bloomberg BNA, New York, NY, July 2014
- Co-presenter, "Foreign Currency Rules and International Tax Planning," TEI – Baltimore/Washington Chapter, Falls Church, VA, June 2014
- Co-presenter, "The Final Section 987 Regulations Are Here (Or Maybe Almost)!", Baker & McKenzie Tax Planning and Transactions Workshop, Chicago, IL, April 2014