



News, Events & Publications

Dr. Stephan Schnorberger

Publications

- Co-author (with Rabea Lingier), "[Chapter 7 Germany](#)", The Transfer Pricing Law Review - Third Edition, June 2019, p. 68-79
- Author, "[Steuerplanung und Steuerpolitik im Post-BEPS-Steuerwettbewerb](#)", Betriebs-Berater, 3/2019, 14 January 2019, p. 1
- Co-author (with Dr. Lars Haverkamp), "[Chapter 7 Germany](#)," The Transfer Pricing Law Review - Second Edition, June 2018, p. 74-83
- Author, "[Tax Structuring Post BEPS](#)," Best of the Best Expert Guides, 24 April 2018, p. 89-90
- Author, "[Steuergestaltung im Zeitalter nach BEPS](#)," Börsen-Zeitung, Ausgabe 39, 24 February 2018, S. 13
- Co-author (with Dr. Lars Haverkamp), "[Die neue Gewinnabgrenzungsaufzeichnungsverordnung 2017 – Kritische Würdigung der finalen Fassung](#)," Betriebs-Berater, 42/2017, 16 October 2017, p. 2455-2459
- Co-author (with Dr. Norbert Mückl), "Materielles Korrespondenzprinzip bei grenzüberschreitenden verdeckten Einlagen von Kapitalgesellschaftsanteilen," DStR, 40/2017, 6 October 2017, p. 2145-2150
- Co-author (with Dr. Lars Haverkamp), "[Chapter 6 Germany](#)," The Transfer Pricing Law Review, July 2017, p. 56-65
- Co-author, "Verrechnungspreismethoden zur Bestimmung von Darlehenszinsen," ISR, 5/2017, p. 151-153
- Co-author (with Dr. Lars Haverkamp), "[Entwurf des Bundesministeriums der Finanzen zur Gewinnabgrenzungsaufzeichnungsverordnung vom 21.2.2017 – Erste Anmerkungen](#)," Betriebs-Berater, 20/2017, 15 May 2017, p. 1111-1118
- Author, "Bilateral and Multilateral Tax Audits in Europe: Are Taxpayers Defenseless?," Tax Notes International, Volume 84, Number 7, p. 685- 687, 14 November 2016

- Co-author, (with Christian Port) "[Schöne neue Welt der internationalen Unternehmensbesteuerung?](#)" Börsen-Zeitung, Ausgabe 180, 17 September 2016, page 9
- Co-author, "Verluste als profitable Dienstleistung? – Steuerrechtliche Grundlagen des Fremdvergleichs", Betriebs-Berater, BB 48.2015, 23.11.2015
- Author, "Germany's Highest Tax Court and the Fundamentals of Arm's-Length Analysis in Treaty Context", BBNA Tax Management Transfer Pricing Report, Vol. 24, No. 6, July 2015
- Co-author, "European Tax Newsletter", July 2012
- Co-author, "Passive Einkünfte einer ausländischen Tochterkapitalgesellschaft sind gewerbsteuerfrei", June 2015
- Co-author, "Teilwertabschreibungen auf Gesellschafterdarlehen und Fremdvergleich Zugleich Anmerkung zum BFH-Urteil vom 17.12.2014 – IR 23/13, IStR 7/2015," vom 2. April 2015, S. 242-245
- Co-author, "Gründungsaufwand bei ausländischen Betriebsstätten: Alles neu macht der ... AOA," Betriebs-Berater 11/2015, 09.03.2015, S. 609-611
- Co-author, "Foundation of Arm's Length Analysis and Write-offs on Intercompany Loans," March 2015
- Author, "The Seven Deadly Sins of Post-Acquisition IP Transfers," BNA Tax Management Transfer Pricing Report, Vol. 23 No. 18, 1/22/2015
- Author, "Sieben häufige Fehler bei der Übertragung immaterieller Wirtschaftsgüter nach Akquisitionen – Vermeidung von Steuerrisiken," Betriebs-Berater 50/2014, 8.12.2014, S. 3031 – 3033
- Co-author, "Betriebsstättengewinnermittlung nach dem OECD-Ansatz: Der Grundfall der Vertriebsbetriebsstätte," IStR 3/2014, S. 81-86
- Co-author, "Transfer Pricing Documentation Requirements," October 2013
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- Co-author, "European Tax Newsletter", May 2013

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- Author, "Anmerkung zum BFH-Urteil vom 11 October 2012 I R 75/11," October 2012
- Author, "The OECD's Project to Define Intangibles: A Case for Adhering to Fundamental Principles," Tax Management Transfer Pricing Report, Vol. 20, No. 23, 4 May 2012
- Co-author, "European Tax Newsletter," May 2012 3
- Co-author, "2013 Proposed Legislation: International Taxation of Permanent Establishments," April 2012
- Co-author, "Die inländische Kapitalgesellschaft als Vertriebsvermittler im internationalen Konzern – Rechtliche und steuerliche Gestaltungsüberlegungen (Teil 1)," ZvertrR, January 2012
- Author, "Wer ist fremd beim Fremdvergleich? Praktischer Fremdvergleich und gesellschaftsrechtliche Beteiligung," DER KONZERN, December 2011
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- Co-author, Baker & McKenzie Comments on OECD Business Restructuring Draft

Presentations

- Presenter, "Abuse of Dominance: Rebates," December 2012
- Presenter, "Monopolies: Market Power and Loss Estimation," October 2012
- Presenter, "Market Definition," May 2012
- Presenter, "Introduction to Antitrust Economics," March 2012