



News, Events & Publications

Kent P. Stackhouse

Publications

- Co-author, "APMA's New Model Signals Move Toward Profit Splits," Baker McKenzie North America Tax News and Developments, Client Alert, March 6, 2019
- Co-author, "OECD and European Commission Release Reports on the Digital Economy; United States Confirms Its Stance," Baker McKenzie North America Tax News and Developments, Volume XVIII, Issue 4, May 2018
- Author, "Tax Court Swiftly Rejects IRS Argument That Closing Agreement is Not Relevant in USD 3.3 Billion Transfer Pricing Case," Baker McKenzie North America Tax News and Developments, Volume XVII, Issue 10, November 2017
- Co-author, "Protecting the Crown Jewels: Protective Orders in Tax Court," Tax Notes, Volume 153, Number 3, October 2016
- Author, "Long-Awaited Final Regulations Under Code Section 336(e) Permit Election to Treat Stock Disposition as Asset Sale," Baker & McKenzie North America Tax News & Developments, Volume 13, Issue 3, June 2013
- Author, "The Supreme Court Affirms Substance-Over-Form Analysis for Foreign Tax Credits in PPL Corporation v. Commissioner, Holds UK Windfall Tax Creditable," Baker & McKenzie North America Tax News & Developments, Volume 13, Issue 3, February 2013
- Author, "New 'No-Rule' Areas Announced by IRS – Major Corporate Transactions Implicated," Baker & McKenzie North America Tax News & Developments, Volume 13, Issue 1, February 2013
- Co-author, "US Supreme Court to address Creditability of UK Windfall Tax," International Tax Review, December 2012-January 2013
- Author, "Tax Court Rules in Favor of Taxpayer's Characterization of Intercompany Advance as Debt, Allows Deduction for Interest Expense," Baker & McKenzie North America Tax News & Developments, Volume 12, Issue 4, August 2012

Presentations

- Co-presenter, "Impact of US Tax Reform on non-US Tax Disputes," Baker McKenzie's Global Tax Disputes Forum, Milan, Italy, February 2019
- Guest Lecturer, "U.S. Transfer Pricing Regulations," International Tax Center Leiden, the Netherlands, January 2019
- Co-presenter, "US Transfer Pricing Developments And Their Global Impact," 7th Annual Africa Transfer Pricing Summit, Johannesburg, South Africa, November 2018
- Co-presenter, "US Tax Reform," Baker McKenzie's EMEA Tax Planning and Transactions Conference, London, England, October 2018
- Co-presenter, "US Policy and Tax Reform (Inbound)," Baker McKenzie London Annual Tax Seminar, London, England, May 2018
- Co-presenter, "Foreign Perspectives on US Tax Reform, What Could This Mean for Your Business? Focus on US Companies with Presence in the Netherlands," Baker McKenzie Ahead of Tax Conference, Amsterdam, the Netherlands, April 2018
- Co-presenter, "Overview of International Tax," Bloomberg BNA Government, Federal Taxation of U.S. Corporations, Washington, DC, September 2017
- Co-presenter, "Introduction to U.S. International Tax Law," Institute for U.S. Law (IUSLAW), Washington, DC, August 2017
- Co-presenter, "Understanding the US GAAP Implications (including FIN 48 aspects) of Overseas Planning Strategies: What Does Every International Tax Lawyer Need to Know?" Baker McKenzie EMEA Tax Conference, Munich, Germany, June 2017
- Co-presenter, "Transfer Pricing for Intangibles," Bloomberg BNA, Hot Issues in International Taxation, Arlington, VA, March 2017
- Co-presenter, "Transfer Pricing in the Age of BEPS," Bloomberg BNA, Hot Issues in International Taxation, Arlington, VA, March 2017
- Co-presenter, "Foreign Base Company Income – Section 954," Bloomberg BNA, Intermediate U.S. International Tax Update, Las Vegas, NV, February 2017
- Co-presenter, "Repatriation Strategies," Bloomberg BNA, Advanced International Tax Seminar, Las Vegas, NV, February 2017
- Panelist, "CbC Reporting Requirements, Options, and Protecting Confidential Data," Tax Executives Institute – Austin, Austin, TX, December 2016
- Panelist, "Parsing India's New Approach to Transfer Pricing," Bloomberg BNA, Global Transfer Pricing Conference: Asia, Hong Kong, China, September 2016
- Panelist, "U.S. vs OECD Perspectives on the Final BEPS Transfer Pricing Report," Bloomberg BNA, Global Transfer Pricing Conference: Asia, Hong Kong, China, September 2016

- Panelist, "Update on Global Transfer Pricing Developments," Baker & McKenzie Global Transfer Pricing Conference, Tokyo, Japan, September 2016
- Panelist, "Parsing India's New Approach to Transfer Pricing," Baker & McKenzie Global Transfer Pricing Conference, Tokyo, Japan, September 2016
- Panelist, "Protective Orders: Necessary Evil or Unnecessary Burden in Tax Court?," 2016 ABA Section of Taxation May Meeting, May 2016
- Co-presenter, "Transfer Pricing Under Section 482," Bloomberg BNA, Introduction to US International Tax, Dallas, TX, May 2016
- Co-presenter, "Event Programming Best Practices," Federal Bar Association Leadership Training Program, Arlington, VA, May 2015
- Co-presenter, "Introduction to U.S. International Tax Law," Institute for U.S. Law (IUSLAW), Washington, DC, August 2014
- Co-presenter, "Understanding the Rules for Computing Foreign Exchange Gain (Loss)," Bloomberg BNA, U.S. International Tax Planning, New York, NY, July 2014