

Tax Series  
Special Update:  
Tax Practice After the  
Tax Cuts and Jobs Act

*Edited by*  
Louis S. Freeman

To order this book, call (800) 260-4PLI or fax us at (800) 321-0093. Ask our Customer Service Department for PLI Item Number 245290, Dept. BAV5.

Practising Law Institute  
1177 Avenue of the Americas  
New York, New York 10036

TAX SERIES SPECIAL UPDATE:  
TAX PRACTICE AFTER THE TAX CUTS AND JOBS ACT

CONTENTS:

INTRODUCTION.....7

1. Some Impacts of the Tax Cuts and Jobs Act on  
Choice of Entity Considerations for Closely  
Held Businesses .....9  
Bahar Schippel  
*Snell & Wilmer LLP*

2. Effective Tax Rates for Typical High-Income Taxpayers.....27  
Bradley T. Borden  
*Brooklyn Law School*

3. A Business Person’s Guide to the Impact of  
the 2017 Tax Act on Merger & Acquisition  
Activity and Structures .....39  
C. Brian Wainwright  
Julia Divola  
*Pillsbury Winthrop Shaw Pittman LLP*

4. U.S. Tax Reform—Observations on M&A  
Tax Considerations (March 26, 2018) .....55  
Laurence M. Bambino  
Ethan D. Harris  
*Shearman & Sterling LLP*

5. Tax Reform: Issues for Corporate M&A.....87  
Maury Passman  
*KPMG LLP*

6. To Spin, or Not to Spin: Tax Reform and the Decision  
to Pursue a Spin-off ..... 111  
Devon M. Bodoh  
Greg W. Featherman  
Blake D. Bitter  
*KPMG LLP*

7.	“Making the U.S. Tax Code Great Again”: Reforms to the International Taxation of U.S. Corporations Level the Playing Field for U.S. Corporations Doing Business .....	129
	Jerald David August <i>Kostelanetz &amp; Fink LLP</i>	
8.	Cross-Border Acquisitions Following the Tax Cuts and Jobs Act .....	161
	Gary B. Mandel Andrew Purcell Sophie Staples <i>Simpson Thacher &amp; Bartlett LLP</i>	
9.	INEs and Outies: How U.S. Tax Reform’s Anti-Hybrid Rules Affect U.S. Outbound Investment in Brazil .....	179
	Devon M. Bodoh Greg W. Featherman Alfonso J. Dulcey <i>KPMG LLP</i>	
10.	U.S. Tax Reform and Intangible Property: To Inbound, or Not to Inbound .....	193
	Devon M. Bodoh Greg W. Featherman Andrew D. Simmons <i>KPMG LLP</i>	
11.	Ruminations on the BEAT and Foreign Banks Operating in the United States (March 27, 2018) .....	209
	Erika W. Nijenhuis <i>Cleary Gottlieb Steen &amp; Hamilton LLP</i>	
12.	Application of TCJA 100% Expensing Allowance to Common Partnership Transactions .....	223
	Glenn E. Dance <i>Grant Thornton LLP</i>	

13. Taxation of Foreign Persons Who Dispose of Interests in Partnerships (March 18, 2018).....	241
Alan Appel <i>New York Law School</i> Michael Karlin Bianca Ko <i>Karlin &amp; Peebles, LLP</i>	
APPENDIX: The Tax Cuts and Jobs Act.....	257
INDEX .....	445

