



# Tax Alert

## Issue 09 | March 2018

In this issue, we bring you our Tax Dispute Resolution Quarterly – Winter 2018 Issue, a publication from KPMG LLP's Tax Dispute Resolution Services Network. This publication covers a spectrum of news and developments in tax enforcement trends, IRS practice and procedure, global tax disputes, and state and local tax issues. Some of the articles featured in this issue include:

- Partnership disguised sale rules - changing again?
- Guidance options for new section 1446(g) withholding
- IRS and APA: Denial is not a strategy
- Will the Supreme Court overturn *Quill*?
- How U.S. BEAT applies to inbound companies
- Participate in KPMG's Tax Dispute Resolution Benchmarking Survey
- Details about KPMG's 2018 Global Tax Disputes & Controversy Client Event

Click [here](#) to download the publication.

### Stay informed

For ongoing insights on tax dispute issues and alternative dispute resolution options, [visit the Tax Audits and Disputes Web page here](#).

Please contact us if you have any questions on the topics above.

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