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THE AMERICAN DECISIONS CONTAINING ALL THE CASES OF GENERAL VALUE AND AUTHORITY DECIDED IN THE COURTS OF THE SEVERAL STATES, FROM THE EARLIEST ISSUE OF THE STATE REPORTS TO THE YEAR 1869 VOLUME



RareBooksClub. Paperback. Book Condition: New. This item is printed on demand. Paperback. 138 pages. Original publisher: Washington: U. S. G. P. O., 2005. LC Number: KF31. H654 2005 OCLC Number: (OCoLC)61144341 Subject: Tax shelters -- United States. Excerpt: . . . 11 of allegedly independent opinion letters on BLIPS containing nu-merous virtually identical paragraphs. Two investment advisory firms, Presidio Advisory Services and Quellos Group, formerly doing business as Quadra Capital Management LLP and QA Investments LLC, assisted in the design, development, marketing, and implementation of tax shelters promoted by KPMG. Addition-ally, Quellos served as the investment advisor for Pricewater-houseCoopers version of FLIP. The following pages provide more detailed information about these and other problems uncovered during the Subcommittee in-vestigation into the role of professional firms in the tax shelter in-dustry. V. ROLE OF ACCOUNTANTS The Subcommittees investigation of the U. S. tax shelter industry found that leading U. S. accounting firms were focused on devel-oping generic tax products aggressively marketed to multiple cli-ents from the late 1990 s to as late as 2003, despite increasing IRS enforcement efforts to halt the tax shelters they were promoting. Accounting firms were devoting substantial resources to develop, market, and implement tax shelters, costing the Treasury billions 21 of dollars in lost tax revenues. To illustrate the problems, the Subcommittee developed case histories focused on tax shelters pro-moted by KPMG, PricewaterhouseCoopers, and Ernst and Young. The investigation also uncovered evidence that these firms took steps to conceal their tax shelter activities from tax authorities and the public, including by failing to register potentially abusive tax shelters with the IRS. A. KPMG The Subcommittee conducted its most detailed examination of four potentially abusive or illegal tax shelters that were developed, marketed, and implemented by KPMG. KPMG International is one of the largest...

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