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## **Publications**

Translations: English

1. German International Taxation / Deutsches Außensteuerrecht

(C.H. Beck: Munich, Jan. 2010)

Bilingual edition of German source materials (statutes, regulations, administrative guidance) with international tax relevance (approx. 900 pages): German original with English translations. Except for the OECD Model Treaty, the translations were prepared by me in coordination with the National Tax Department of KPMG AG.

Translations: German

1. Neues US-Quellensteuerabzugsverfahren: Final QI Agreement gem. Rev. Proc. 2000-12

(Verlag für Wirtschaftskommunikation: March 2000)

Bilingual edition of Rev. Proc. 2000-12: English original with German translation, prepared by me in coordination with the workgroup "U.S. Withholding Regulations" of KPMG AG.

2. Neues US-Quellensteuerabzugsverfahren: Proposed QI Audit Guidelines gem. IRS Notice 2001-66

(Verlag für Wirtschaftskommunikation: January 2002)

Bilingual edition of IRS Notice 2001-66: English original with German translation, prepared by me in coordination with the workgroup "U.S. Withholding Regulations" of KPMG AG.

3. Neues US-Quellensteuerabzugsverfahren: Final QI Audit Guidelines gem. Rev. Proc. 2002-55

(Verlag für Wirtschaftskommunikation: Sept. 2002)

Bilingual edition of Rev. Proc. 2002-55: English original with German translation, prepared by me in coordination with the workgroup "U.S. Withholding Regulations" of KPMG AG.

4. Neues US-Quellensteuerabzugsverfahren: Final Agreements for Withholding Foreign Partnerships and Trusts gem. Rev. Proc. 2003-64

(Verlag für Wirtschaftskommunikation: November 2003)

Bilingual edition of Rev. Proc. 2003-64: English original with German translation, prepared by me in coordination with the workgroup "U.S. Withholding Regulations" of KPMG AG.

# WILLIAM B A D E R

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Articles: English

# 1. Überseering: Analysis and Outlook

co-author Dr. Hans-Jochen Gutike (BNA Tax Planning Int'l. Mergers & Acquisitions, Sept. 2003 p. 3)

# 2. New German Transfer Pricing Documentation Rules

co-author Dr. Rolf Heinrich (BNA Tax Planning Int'l. Transfer Pricing, July 2003, p. 3)

#### 3. Update on Transfer Pricing Documentation Rules

co-author Dr. Rolf Heinrich (BNA Tax Planning Int'l. Transfer Pricing, August 2003, p. 21)

# 4. Logic and Illogic of German Transfer Pricing Law - Part I

co-author Dr. Alexander Vögele (BNA Tax Planning Int'l. Transfer Pricing, August 2002, p. 3)

# 5. Logic and Illogic of German Transfer Pricing Law - Part II

co-author Dr. Alexander Vögele Vögele (BNA Tax Planning Int'l. Transfer Pricing, Sept. 2002, p. 14)

#### 6. Key Transfer Pricing Statute Void Under EU Law?

co-author Dr. Alexander Vögele (BNA Tax Planning Int'l. Transfer Pricing, June 2002, p. 15)

### 7. German Transfer Pricing New Deal

co-author Dr. Alexander Vögele (BNA Tax Planning Int'l. Transfer Pricing, March 2002, p. 7)

## 8. Taxpayers in the Dark as German Electronic Audit Looms

co-author Dr. Alexander Vögele (BNA Tax Planning Int'l. Transfer Pricing, Sept. 2001, p. 3)

### 9. The Return of Mosley

(The Wiener Library Bulletin, 1977, Vol. XXX, p. 62)

#### 10. Jeremy Bentham: Businessman or Philanthropist?

(Albion Vol. 7 No. 3, Autumn 1975, p. 245)



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Articles: German

1. Systematik der Schätzung von Verrechnungspreisen

co-author Dr. Alexander Vögele (Internationales Steuerrecht, Oct. 2002, p. 354)