CASENOTE

Mowing Down a Grass Roots	
MOVEMENT BUT PROTECTING THE CRABGRASS:	
Congressional Term Limits	
ARE UNCONSTITUTIONAL Lincoln J. Connolly	661

University of Miami Law Rev

VOLUME 50

APRIL 1996

International Tax Symposium

ARTICLES

An Overview of International Tax Issues	445
TAX TREATY ISSUES	455
Foreign Tax Problems of U.S. Companies Doing Business in Latin America Peter D. Byrne	483
"Hybrid" Entities and Evolving Issues on Acquisition Structures for Foreign Acquirors	499
STRUCTURING FOREIGN INVESTMENT IN UNITED STATES REAL ESTATE William H. Newton III	517
U.S. FINAL TRANSFER PRICING REGULATIONS John S. Nolan	537
International Cooperation and Understanding: What's New About the OECD's Transfer Pricing Guidelines	577
Source-Basis Taxation of Derivative Financial Instruments: Some Unanswered Questions	597
International Criminal Tax Cases Cono R. Namorato and Scott D. Michel	617
COMMENT	
THE LEGALITY OF DENYING STATE FOSTER CARE TO ILLEGAL ALIEN CHILDREN: ARE ABUSED AND ABANDONED CHILDREN THE FIRST CASUALTIES IN AMERICA'S WAR ON INVIGRATION? Carolyn S. Salishyny	622

Z VINIVERSITY OF VIA 1

LAW REVIEW

International Tax Symposium

ARTICLES

An Overview of International Tax Issues Jose

JOSEPH H. GUTTENTAG

Tax Treaty Issues

DAVID R. TILLINGHAST

Foreign Tax Problems of U.S. Companies Doing Business in Latin America

PETER D. BYRNE

"Hybrid" Entities and Evolving Issues on Acquisition Structures for Foreign Acquirors

WM. L. BURKE

Structuring Foreign Investment in United States Real Estate

WILLIAM H. NEWTON III

U.S. Final Transfer Pricing Regulations

JOHN S. NOLAN

International Cooperation and
Understanding: What's New About the
OECD's Transfer Pricing Guidelines

Frances M. Horner

Source-Basis Taxation of Derivative Financial Instruments: Some Unanswered Questions

H. DAVID ROSENBLOOM

International Criminal Tax Cases

CONO R. NAMORATO and SCOTT D. MICHEL

COMMENT

The Legality of Denying State Foster Care to Illegal Alien Children: Are Abused and Abandoned Children the First Casualties in America's War on Immigration?

CASENOTE

Mowing Down a Grass Roots Movement but Protecting the Crabgrass: Congressional Term Limits Are Unconstitutional

VOLUME 50 APRIL 1996 NUMBER 3