

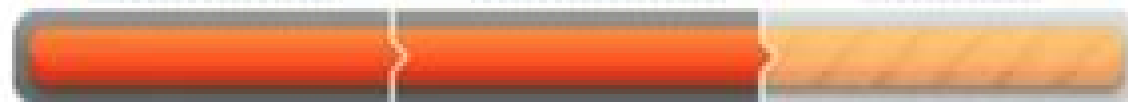
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Jin-Ying Zhang



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bring an action in any United States District Court or in the United States Court of Federal Claims however these venues require that the tax be paid first and that the party then file a lawsuit to recover the contested amount paid the full payment rule Contents 8 Findings of Fact 8 Background 8 John Hancock s History9 Investment Process and Review10 Leasing10 LILO and SILO Transactions 10 Basic Structure 15 History 17 Due Diligence 18 The Hoosier Transaction 19 The LILO Test Transactions 20 OBB LILO20 Lease and Sublease23 End of Sublease Term25 SNCB 2 and SNCB 5 Lot 1 LILO Transactions25 Lease and Sublease28 End of Sublease Term 28 The SILO Test Transactions 29 TIWAG29 Lease and Sublease33 End of Sublease Term35 Two Dortmund Transactions35 Lease and Sublease38 End of Sublease39 SNCB SILO39 Grant and Subgrant42 End of Subgrant Term 43 Tax Returns Notices of Deficiency and Trial 43 Procedural History48 Trial 53 Opinion 53 Burden of Proof53 Principal Place of Business54 Leveraged Lease Transactions54 Frank Lyon58 LILO and SILO Litigation 77 The Test Transactions 78 Economic Substance79 Objective Inquiry88 Subjective Inquiry89 Substance Over Form91 OBB and SNCB LILO Transactions110 SILO Test Transactions 145 Interest Deductions 147 Original Issue Discount 149 Transaction Expenses 149 Conclusion NOTE NO FURTHER DISCOUNTS FOR ALREADY REDUCED SALE ITEMS Keywords tax court reports reports of the united states tax court u s tax court reports united states tax court reports united states tax court u s tax court tax court

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