# No. 26947

## UNITED STATES OF AMERICA
## and
## INTER-PARLIAMENTARY UNION

## Exchange of notes constituting an agreement concerning the reimbursement of income tax. Geneva, 17 September and 27 October 1981

*Authentic text: English.*

*Registered by the United States of America on 29 November 1989.*

## ÉTATS-UNIS D'AMÉRIQUE
## et
## UNION INTER-PARLEMENTAIRE

## Échange de notes constituant un accord relatif au remboursement des impôts sur le revenu. Genève, 17 septembre et 27 octobre 1981

*Texte authentique : anglais.*

*Enregistré par les États-Unis d'Amérique le 29 novembre 1989.*

# EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT[1] BETWEEN THE UNITED STATES OF AMERICA AND THE INTER-PARLIAMENTARY UNION CONCERNING THE REIMBURSEMENT OF INCOME TAX

I

UNITED STATES MISSION TO INTERNATIONAL ORGANIZATIONS
GENEVA, SWITZERLAND

September 17, 1981

No. 344

The Permanent Mission of the United States of America to the United Nations Office and other International Organizations in Geneva presents its compliments to the Inter-Parliamentary Union and has the honor to refer to the previous correspondence between the Mission and the IPU with regard to the conclusion of a tax reimbursement agreement between the United States Government and the IPU.

The Mission has been requested to seek agreement to the following additions and modification to the text presented in its letters of April 21 and May 22, 1981:

Addition at the end of the first paragraph of the sentence: "An advance payment made by the IPU relating to the estimated tax liability of an employee during a current year will be treated as a reimbursement provided that such payment is effected by an instrument jointly payable to the Internal Revenue Service and the employee."

Addition at the end of the second paragraph of the following phrase: ". . . payments made specifically to compensate an employee for the United States federal income tax for which the employee is liable or has paid."

Modification of the antepenultimate paragraph to read as follows and moving it within the text so that it becomes the fourth paragraph: "The United States Government will reimburse for each taxpayer an amount not to exceed the federal income tax that would be due if the specified categories of IPU income were the taxpayer's only income, taking into account any special tax benefits available to United States taxpayers employed abroad, as well as the deductions and personal exemptions generally allowed."

The full tax reimbursement agreement would then read:

"The Inter-Parliamentary Union (IPU) will reimburse IPU staff members who are United States citizens, or who are otherwise liable to pay United States federal income taxes, for those United States federal income taxes that these employees have paid on IPU income as specified below. An advance payment made by the IPU relating to the estimated tax liability of an employee during a current year will be treated as a reimbursement provided that such payment is effected by an instrument jointly payable to the Internal Revenue Service and the employee.

[1] Came into force on 27 October 1981, with retroactive effect from 1 January 1981, in accordance with the provisions of the said notes.