

No. 19937

**UNITED STATES OF AMERICA
and
INTERNATIONAL SUGAR ORGANIZATION**

**Exchange of letters constituting an agreement concerning
reimbursement of income taxes. London, 10 July 1980**

Authentic text: English.

Registered by the United States of America on 10 June 1981.

**ÉTATS-UNIS D'AMÉRIQUE
et
ORGANISATION INTERNATIONALE DU SUCRE**

**Échange de lettres constituant un accord relatif au rembour-
sement de l'impôt sur le revenu. Londres, 10 juillet
1980**

Texte authentique : anglais.

Enregistré par les États-Unis d'Amérique le 10 juin 1981.

EXCHANGE OF LETTERS CONSTITUTING AN AGREEMENT¹
BETWEEN THE UNITED STATES OF AMERICA AND THE
INTERNATIONAL SUGAR ORGANIZATION CONCERNING
REIMBURSEMENT OF INCOME TAXES

I

EMBASSY OF THE UNITED STATES OF AMERICA
LONDON

July 10, 1980

Dear Mr. Miller:

I have been authorized to inform you that the United States Government can reimburse the International Sugar Organization for the sums utilized to reimburse personnel subject to payment of U.S. income tax in order to equalize the remuneration of such personnel and that of staff members of the ISO not subject to national taxes. To do this, I propose below a formal agreement establishing the procedure:

The United States Government understands that the International Sugar Organization (ISO) will reimburse ISO staff members who are U.S. citizens, or otherwise liable to pay U.S. income taxes, for any U.S. income taxes paid on their ISO income through a special suspense account. The U.S. Government will be obligated to pay a tax equalization charge as part of its annual payment to the ISO to compensate this special suspense account. This charge will cover actual reimbursements made by the ISO to employees subject to U.S. income taxes. This agreement does not cover employees paid from voluntary funds.

This agreement may be terminated by either party. Termination shall take effect one year from the date that notice of termination is given.

Your concurrence in the above text by letter will constitute the agreement between the United States and the International Sugar Organization formalizing the tax reimbursement procedure which will enter into force as of January 1, 1980.

Sincerely,

[Signed]

KINGMAN BREWSTER
Ambassador

Mr. William K. Miller
Executive Director
International Sugar Organization
London

¹ Came into force on 10 July 1980 by the exchange of the said letters, with retroactive effect from 1 January 1980, in accordance with their provisions.

II

INTERNATIONAL SUGAR ORGANIZATION
LONDON

Executive Director

July 10, 1980

Dear Ambassador Brewster:

Thank you for your letter of July 10, 1980 proposing a formal agreement by which the United States Government will compensate the International Sugar Organization for the sums utilized to reimburse the U.S. income taxes incurred by its staff members paid under its regular budget. The proposed agreement is set out in the following text:

[See letter I]

I am happy to indicate my concurrence in the above text, on the understanding that it concerns all U.S. income taxes levied on ISO income, and my acceptance that this exchange of letters constitutes the agreement between the United States Government and the International Sugar Organization formalizing the tax reimbursements procedure which will enter into force as of January 1, 1980.

Sincerely,

[Signed]

WILLIAM K. MILLER

Ambassador Kingman Brewster
Embassy of the United States of America
London
