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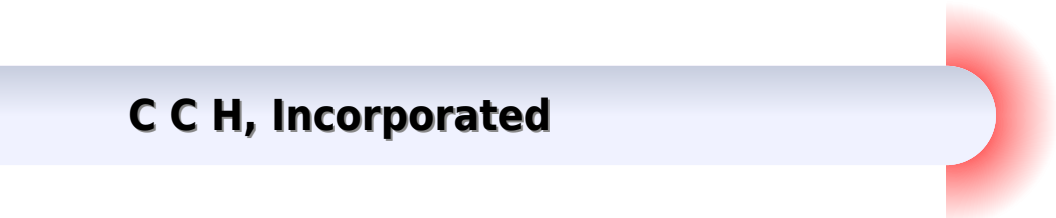
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(2009) CCH Tax Law Editors, Fred Conklin, 2009-03 **Tax Reform with the 20/20 Tax** James C. Tanner, 2015-12-02 Many books have been written about tax reform, but none offer the pragmatic and understandable approach that you'll find in this treatise filled with a nonpartisan set of solutions to fix an antiquated and indecipherable tax system. James C. Tanner, a certified public accountant with more than four decades of experience, explores how we can create a fair and logical tax framework by rethinking income exclusions, exemptions, deductions, credits, tax brackets, capital gains, and other tax alternatives, reform tax expenditures including health insurance and medical costs, home mortgage and other interest deductions, retirement plan deductions, charitable donations, and capital gains on assets sold and transferred, lower the tax rates for most individual and corporate taxpayers while making our U.S. companies more competitive with their foreign counterparts. Tanner also outlines how historical decisions and legislative proposals led to our current tax laws under the premise that we can't fix them without understanding why they were created in the first place. For those who want to participate in the national debate on federal tax reform, it begins with a firm understanding of the system and the practical proposals in *Tax Reform with the 20/20 Tax*. U. S. Master Estate and Gift Tax Guide CCH Tax Law Editors, 2007-12 CCH's

U.S. Master Estate and Gift Tax Guide is a concise and reliable handbook for both tax advisors and estate representatives involved in federal estate and gift tax planning, return preparation, and tax payment. This trusted reference provides clear explanations of the laws relating to federal estate, gift, and generation-skipping transfer taxes to give readers the solid understanding they need to understand and apply today's complex wealth transfer tax rules. **Towards a Neutral**

Formulary Apportionment System in Regional Integration Shu-Chien Chen, 2023-03-09 International tax regimes and

practices are heavily criticized for failing to fairly levy corporate tax on giant multinational taxpayers in the current globalized and digitalized world This important and far seeing book demonstrates how formulary apportionment FA an approach by which a multinational corporation pays each jurisdiction s corporate tax based on the share of its worldwide income allocated to that jurisdiction can achieve the much sought goal of aligning value creation and taxation The author through an intensive analysis of the European Union s EU s Common Consolidated Corporate Tax Base CCCTB Directive Proposal s and comparison to the United States US s formulary apportionment experience shows how the perceived problems with an FA system can be overcome and lays out the necessary elements for its feasibility With detailed attention to the debates around formulary apportionment and its theoretical foundations the book provides a blueprint for rebuilding the normative framework for the EU s tax reform by clearly analysing the implications of the following and more theorising public benefits to be represented by taxation reorganising different economic theories about tax neutrality and tax justice advancing the comparative legal research methodology to analyse law reform by combining the functional approach and the problem solving approach designing the logical formulary apportionment system for digital economy ensuring the removal of the incentive for multinationals to shift reported income to low tax locations reducing the tax system s complexity and the administrative burden it imposes on firms eliminating transfer pricing complexity for intra firm transactions achieving equal weighting of the sales factor the labour factor and the asset factor in the formula application of destination based rule for attributing the sales factor and replacing the traditional permanent establishment nexus with a factor presence nexus The presentation incorporates extensive comparison between the EU s formulary apportionment tax reform option and FA systems existing in the United States US at state level including reference to relevant US case law and legislation As a possible option to address the problem of base erosion and profit shifting BEPS formulary apportionment is gaining increasing acceptance and attention This book will prove invaluable to taxation authorities tax practitioners and scholars in its deeply informed and systematic guidance on good practices and prevention of problematic experiences in establishing and implementing an effective and market neutral FA system *Tax Research Techniques* Robert L. Gardner, Dave N.

Stewart, Ronald G. Worsham, 2017-05-15 *Tax Research Techniques* provides a working knowledge of the methodology of implementation based tax research Drawing on the latest developments in online research the authors reveal how to ask the right questions organize the facts locate and assess pertinent authority and clearly communicate research findings The Trusted Research Training Manual for Over 30 Years As tax laws and tax research methods have changed over the past three decades *Tax Research Techniques* has been a trusted resource to guide students and practitioners alike to best practices for efficient tax research This latest edition updates examples and illustrations to highlight changes in tax law and online tax research over the past several years *Tax Research Techniques* will sharpen your knowledge of these five key tax research procedures How to Get the Facts How to Ask Expert Questions How to Search for the Right Authority How to Resolve the

Question How to Communicate Your Conclusions New and updated sections reflect the continuously evolving advances in the technology of Web based research

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International Taxation of Manufacturing and Distribution John Abrahamson,2016-02-18 The most thorough treatment of its subject available this book introduces and analyses the international tax issues relating to international manufacturing and distribution activities extending from the tax regime in the country where the manufacturing activities are located through to regional purchase and sales companies to the taxation of local country sales companies The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends Among the topics and issues analysed in depth are the following foreign tax credits taxation in the digital economy tax incentives intellectual property group treasury companies mergers and acquisitions leasing derivatives controlled foreign corporation provisions VAT and customs tariffs free trade agreements and customs unions transfer pricing role of tax treaties hedging related accounting issues deferred tax assets and liabilities tax risk management supply chain management depreciation allowances and carry forward tax losses The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples Detailed up to date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting BEPS and other measures against tax avoidance As a full scale commentary and analysis of international taxation issues for multinational manufacturing groups including in depth consideration of corporate structures tax treaties transfer pricing and current developments this book is without peer It will prove of inestimable value to all accountants lawyers economists financial managers and government officials working in international trade environments

U. S. Master Bank Tax Guide Ronald W. Blasi,2007-12 Formerly titled the Bank Tax Guide the new U S Master Bank Tax Guide 2008 by noted bank tax expert Ronald W Blasi J D LL M is a comprehensive desktop reference that covers all the tax rules for financial institutions and is the only book of its kind that is completely updated each year to reflect the latest changes through press time This is the authoritative must have guide for professionals charged with tax compliance for financial institutions It features special planning sections in each chapter detailed discussions that are meticulously referenced to authority for additional research potential IRS audit activities and numerous practical examples that illustrate the rules and principles The volume provides informative discussions on points of law where the courts and the IRS may not see eye to eye

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