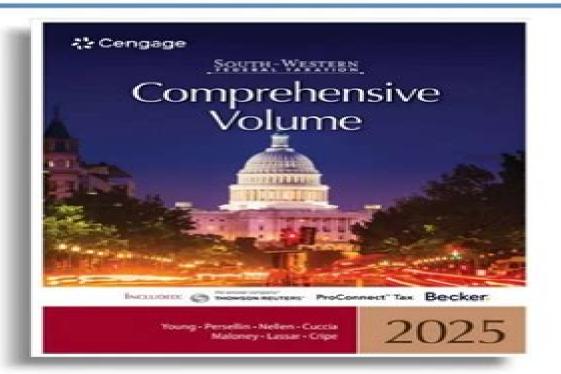
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South-Western Federal Taxation 2025,

Comprehensive Volume

48TH EDITION

Young, James; Persellin, Mark; Nellen, Annette; Cuccia, Andrew; Maloney, David



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Thomas R. Pope, Kenneth Edward Anderson, John L. Kramer

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Transfer Pricing Aspects of Intra-Group Financing Raffaele Petruzzi,2013-10-20 For corporate managers maximization of the profits and the market value of the firm is a prime objective The logical working out of this principle in multinational enterprises has led to an intense focus on transfer pricing between related companies principally on account of the very attractive tax advantages made possible Inevitably numerous countries have established transfer pricing legislation designed to combat the distortions and manipulations that are inherent in such transactions This important book one of the first in depth analysis of the current worldwide working of transfer pricing in intra group financing and its resonance in law presents the relevant issues related to loans financial guarantees and cash pooling analyses an innovative possible approach to these issues and describes new methodologies that can be implemented in practice in order to make intra group financing more compliant with efficient corporate financing decisions and the generally accepted OECD arm s length principle

Comparing the tax measures implemented in the corporate tax law systems of forty countries this study investigates such aspects of intra group financing as the following corporate finance theories studies and surveys regarding financing decisions application of the arm's length principle to limit the deductibility of interest expenses impact of the OECD's Base Erosion and Profit Shifting BEPS project transfer pricing issues related to intra group financing credit risk in corporate finance rationales utilized by credit rating agencies and the assessment of arm's length nature of intra group financing. The author describes ways in which the application of the arm's length principle can be strengthened and how the related risk of distortion and manipulation can be minimized. The solutions and methodologies proposed are applicable to any business sector Given that determination of the arm's length nature of transactions between related companies is one of the most difficult tasks currently faced by taxpayers and tax administrations around the world this thorough assessment and analysis will prove extraordinarily useful for in house and advisory practitioners corporate officers academics international organizations and government officials charged with finding effective responses to the serious issues raised In addition to its well researched analysis the book s comparative overview of how loans financial guarantees and cash pooling are currently addressed by OECD Member States and by their national courts is of great practical value in business decision making Road to Sustainable Growth: Resource Productivity and Corporate Taxation Mark Bowler Smith, 2013 This book explores one way in which a tax system might help promote competitiveness and sustainable development Focusing on the UK corporation tax it recommends the introduction of a Resource Productivity Tax Credit where resource productivity is defined as the money value of outputs relative to the money value of material resource and non renewable energy inputs The book is structured such that it first explores the legal mandate to promote competitiveness and sustainable development as contained in article 3 3 of the Treaty of the European Union It then explores what competitiveness and sustainable development actually mean particularly in an EU policy context through the lenses of Europe 2020 and the EU Sustainable Development Strategy It concludes that not only is there a great deal of common ground between competitiveness and sustainable development as objectives but that increasing resource productivity is a necessary means to those shared ends After exploring EU tax policy and the relevant rules of the UK corporation tax for evidence of any kind of focus on competitiveness and sustainable development as well as examining the suitability of corporate income taxes as policy instruments for increasing resource productivity the book concludes that there is ample scope for a statutory tax incentive to be appended to the UK corporation tax to help fulfil the article 3 mandate The headline objective of the Resource Productivity Tax Credit is to promote higher resource productivity in the trading activities of individual companies in particular targeted sectors through improvements to the knowledge base of those companies rather than through the increased use of raw materials non renewable energy and or intermediate goods Tax Notes International ,2007 Fundamental Tax Reform United States. Congress. House. Committee on Ways and Means, 2011 IRS and the Tax Gap United States. Congress.

House. Committee on the Budget, 2007 Im West Federal Taxation Willis, Hoffman, Maloney, 2003-07 New Serial Titles ,1981 A union list of serials commencing publication after Dec 31 1949 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 youll 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 US 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 cant 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 Wiley Handbook of Science and Technology for Homeland Security, 4 **Volume Set** John G. Voeller, 2010-04-12 The Wiley Handbook of Science and Technology for Homeland Security is an essential and timely collection of resources designed to support the effective communication of homeland security research across all disciplines and institutional boundaries Truly a unique work this 4 volume set focuses on the science behind safety security and recovery from both man made and natural disasters has a broad scope and international focus The Handbook Educates researchers in the critical needs of the homeland security and intelligence communities and the potential contributions of their own disciplines Emphasizes the role of fundamental science in creating novel technological solutions Details the international dimensions of homeland security and counterterrorism research Provides guidance on technology diffusion from the laboratory to the field Supports cross disciplinary dialogue in this field between operational R D and Budget of the United States Government United States. Office of Management and consumer communities Budget,2007

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