

## PREPARATORY EXAMINATION 2023

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# Accounting Examination Preparatory September 2014 Memo

**Executive Office of the President** 

### **Accounting Examination Preparatory September 2014 Memo:**

The Budget of the United States Government United States. Office of Management and Budget, 2015 **Budget of** the United States Government United States. Office of Management and Budget, 2014 Appendix, Budget of the United States Government, Fiscal Year 2016 Executive Office of the President, 2015-02-02 Officially released on February 2 2015 As one of the reference volumes of the FY2016 Budget request of the President the popular Fiscal Year Budget Appendix volume presents detailed financial information on individual programs Federal agencies and appropriation accounts that constitute the budget in tables and graphs Includes for each Government department and agency the text of proposed appropriations language budget schedules for each account new legislative proposals and explanations of the work to be performed and the funds needed and proposed general provisions applicable to the appropriations of entire agencies or groups of agencies Federal agency personnel policy makers think tank advocates lawmakers media organizations and others interested in a line item by line item view of the President's proposed Fiscal year Budget will want this resource in their personal library collection Public and academic libraries will want to make this annual reference product available for the general public in their Government collections Students studying Public Finance political scientists and researchers will appreciate this detailed information with authoritative data legends presented in tables and graphs Efficient, Effective, Accountable United States. Office of Management and Budget, 2018 **Yearbook of International Organizations 2014-2015,** Volumes 1a & 1b (Set) Union of International Associations, 2014-06-16 Volume 1 A and B covers international organizations throughout the world comprising their aims activities and events *Iurisdiction to Tax Corporate Income Pursuant to the* Presumptive Benefit Principle Eva Escribano, 2019-05-10 Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle intends to demonstrate that the profit shifting phenomenon i e the ability of companies to book their profits in jurisdictions other than those that host their economic activities is real severe undesirable and above all the natural consequence of both the preservation of three fundamental paradigms that have historically underlain corporate income taxes and their precise legal configuration In view of this the book submits a number of proposals in relation to the aforementioned paradigms and in the light of the suggested presumptive benefit principle so as to counteract profit shifting risks and thus attain a more equitable allocation of taxing rights among States This PhD thesis obtained the prestigious European Academic Tax Thesis Award 2018 granted by the European Commission and the European Association of Tax Law Professors What s in this book This book provides a disruptive discourse on tax sovereignty in the field of corporate income taxation that endeavors to escape from long standing tax policy tendencies and prejudices while considering the challenges posed by a globalized and increasingly digitalized economy In particular the book offers an innovative perspective on certain deep rooted paradigms historically underlying corporate income taxation tax treatment of related parties within a corporate group along with the arm's length standard corporate tax residence standards and definition of source for corporate income

tax purposes with a particular emphasis on the permanent establishment concept The book explores their respective origins supposed tax policy rationales structural problems and interactions ultimately showing how the way tax jurisdiction is currently defined through them inherently tends to trigger profit shifting outcomes In view of the conclusions of the study the author suggests the use of a new version of the traditional benefit principle the presumptive benefit principle that would contribute to address the profit shifting phenomenon while serving as a practical guideline to achieve a more equitable allocation of taxing rights among jurisdictions Finally the book submits a number of proposals inspired by the aforementioned guideline that aspire to strike a balance between equity effectiveness and technical feasibility. They include a new corporate tax residence test and most notably a proposal on a new remote sales permanent establishment. How this will help you With its case study based on the Apple group empirically demonstrating the existence of the profit shifting phenomenon its clearly documented exposure of the reasons why traditional corporate income tax regimes systematically give rise to these outcomes its new tax policy guideline and its proposals for reform this book makes a significant contribution to current tax policy discussions concerning corporate income taxation in cross border scenarios. It will be warmly welcomed by all concerned policymakers scholars practitioners with the greatest tax policy challenges that corporate income taxation is facing in the contemporary world

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