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James C. Tanner



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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

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 *U.S. Master Property Tax Guide (2008)* CCH State Tax Law Editors, 2008-03 CCH's U.S. Master Property Tax Guide is a practical quick answer resource to the key issues and concepts that professionals who deal with state and local property taxes need to know. This handy desktop reference contains concise explanations on major property tax areas in a readily accessible, easy to use and easy to understand format. It provides an overview of the property tax and valuation assessment methods used by the different taxing jurisdictions and provides readers with the key definitions, concepts and procedures necessary to understand the application of local property taxes.

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