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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 U. S. Master Estate and Gift Tax Guide CCH Tax Law implementing an effective and market neutral FA system 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 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 United States Master Tax Guide .2009 Tax Research

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