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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 **2001**

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Master Federal Tax Manual ,1990 **Subject Guide to Books in Print** ,1991 **Bowker's Law Books and Serials in Print** ,1984 **Gale Directory of Databases** ,1993 **U.S. Master Property Tax Guide (2017)** Cch State Tax Law,2017-02 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 Supported by multistate charts and discussions of the state and local property tax systems helpful state by state coverage includes property subject to tax exemptions and exclusions available for different classes of property and taxpayers how property taxes are determined including the classification valuation equalization assessment and levy of tax currently available credits and abatements of property tax options available to taxpayers prior to the state court system property tax due dates key contacts in the various taxing jurisdictions and more The U.S. Master Property Tax Guide provides a helpful annual snapshot of key property tax provisions and is a convenient desktop complement to CCH's comprehensive Internet

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