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This concise paperback text provides the ideal introduction to the basic principles and rules of the United States international tax system. Brief and accessible, INTRODUCTION TO UNITED STATES INTERNATIONAL TAXATION, Fifth Edition, supplies just enough detail to facilitate understanding without overwhelming students. The book gained widespread use because of its: distinguished authors who draw on their expertise in both taxation and teaching to make their book approachable instead of intimidating clear and lucid introduction to the application of the U.S. income and wealth transfer tax systems to taxpayers investing or transacting business in the U.S. and other countries excellent overview of the U.S. income tax system that briefly describes the corporation income tax, the individual income tax, the tax treatment of partnerships, trusts, and estates, and accounting aspects of the U.S. income tax helpful inclusion of references to the Internal Revenue Code provisions under discussion and to the Treasury Regulations issued interpreting the statutory rules coverage of significant administrative announcements of the Internal Revenue Service (Revenue Rulings and Revenue Procedures) as well as important case law exceptionally clear explanations, which are particularly valuable for instructors who use problems in their courses Revised and refined for its Fifth Edition, the text now: covers in detail the

important changes made by the 2004 Jobs Act, the most important international tax legislation since 1986 contains updated comparative references

This superb book will guide the reader through the key issues and practical aspects of international tax practice. It demonstrates how different global tax systems interact and how to prevent paying more tax than necessary. The basic principles of each aspect of international taxation are outlined and then examined in greater depth and detail. This updated third edition includes coverage of both UK and EU legislation and regulation, as well as the key cases and rulings. Complicated double taxation concepts are clearly illustrated with examples and diagrams to help the reader quickly understand how they'll apply in practice. Examples of policies adopted in other countries are included, along with specialist commentary and guidance.

Principles of International Taxation, Fifth Edition is a highly accessible text which provides a clear introduction to international taxation as well as more in-depth material on many essential areas of the subject. Whilst using some examples from the UK tax system, the book presents its material in a global context, explaining the variety of approaches used around the world to deal with the key issues that arise in international tax. Principles of International Taxation deals with the legal issues and planning points central to international taxation, using simple examples and diagrams throughout to aid the reader's understanding. Lists of further reading are given at the end of each chapter, making the book suitable for academic as well as professional use. This is an essential title for lawyers and accountants practising in the area of international tax, candidates studying for Paper 1 of the Advanced Diploma in International Tax and for both postgraduate and undergraduate university students. Previous print edition ISBN: 9781780434537

The arm's length principle serves as the domestic and international standard to evaluate transfer prices between members of multinational enterprises for tax purposes. The OECD has adopted the arm's length principle in Article 9 of its Model Income Tax Convention in order to ensure that transfer prices between members of multinational enterprises correspond to those that would have been agreed between independent enterprises under comparable circumstances. The arm's length principle provides the legal framework for governments to have their fair share of taxes, and for enterprises to avoid double taxation on their profits. This timely book contains a comparative analysis of the legal basis for the arm's length principle and the contents of the arm's length rules in US tax law as well as in the OECD Model Tax Convention and Transfer Pricing Guidelines. It includes a thorough review of international case law on transfer pricing from the United States, Canada, Australia, United Kingdom, Germany, France, the Netherlands, Denmark, Sweden, and Norway. The book ends with an analysis of the issues associated with the application of the arm's length principle for multinational enterprises in a global economy.

Petroleum fiscal systems are arrangements for sharing the economic value from petroleum extraction between the host nation and the companies engaged in the extraction. In most countries, oil and gas resources are under the control of the national Government. The activities of exploiting the resources are undertaken by firms, some of which are owned by the state. Petroleum resource management therefore is an interaction of two key parties: The enterprises which carry out operations of finding and extracting petroleum from the ground, and the Government as custodian of the resources on behalf of the host nation which ultimately owns them. The book reviews the various instruments which may form the petroleum fiscal system of a jurisdiction, with numerous examples from countries having configured their systems very differently. It also reviews fiscal valuation and control, related cross-border issues, and the economic analysis and design of fiscal systems related to a variety of development scenarios found in modern petroleum operations.

The essays analyse the interactions between tax law and tax policy. The analyses evaluate changes which presuppose the foreign tax credit mechanism, the separate taxation of corporations and their shareholders, and other basic elements in US taxation of foreign income.

The book provides an introduction to European law on direct taxation. It includes an overview of the sources of European law, the impact of the fundamental freedoms on direct taxation and the relevance of the European state aid provisions in tax matters. Further, it analyses all relevant directives in the field of direct taxation, namely the Parent-Subsidiary Directive, the Merger Directive, the Interest and Royalty Directive, looks at mutual assistance, as well as the EU Arbitration Convention. This edition has some structural changes, primarily made to adapt the analysis of European tax integration to the application of the EU Charter on Fundamental Rights in tax matters and the development of global tax competition. The latter phenomenon is being targeted by the BEPS and Tax Transparency projects in a supranational framework that coordinates the exercise of national taxing rights around the globe and which also has significant repercussions for European tax integration.

Kobetsky, O'Connell and Stewart's Income Tax is an established tax book, which has received very positive reviews in leading law journals. The book is designed to explain the principles of Australian taxation law in plain English. The book provides students with concise extracts and other materials to illustrate the application of the income tax principles. All chapters in the fifth edition of this established text have been fully revised to include the latest developments in taxation law. Three chapters have been completely rewritten: see the chapters on anti-avoidance, international taxation and tax administration.

In its most advanced form, e-commerce allows unidentified purchasers to pay obscure vendors in 'electronic cash' for products that are often goods, services and licenses all rolled into one. This book considers the implications for the domestic and international tax systems of the growth of e-commerce. It covers a wide variety of activities, from discussion of the principles governing direct and indirect taxation, to explanation of the implementation and use of e-commerce on the part of businesses as well as the application of existing tax principles in this field. With its focus on the broader issues surrounding the expansion of e-commerce and its attention to the problems arising internationally in this field, Global Perspectives in E-Commerce Taxation Law will appeal to scholars worldwide.

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