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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 How Your Retirement Benefits are Taxed ,2012 Monthly Catalog, United States Public Documents, 1937 Taxation. Virtual Currency and Blockchain Aleksandra Bal, 2018-11-29 The emergence of convertible decentralized virtual currency schemes confronts tax authorities with unprecedented questions among them are the status of virtual currency for tax purposes which virtual transactions may bene t from a VAT exemption and determining the most optimal method of tax regulation This rst book length treatment of this major current topic provides an in depth and comprehensive analysis of the tax implications of virtual currency transactions Seeking to ascertain whether virtual currency requires additional regulation or whether the law as it stands is adequate to administer its usage the analysis not only thoroughly explains the nature of the underlying blockchain technology and its regulatory and judicial treatment so far but also identi es best practices for virtual currency transactions and makes recommendations for the improvement of the existing tax systems Among the aspects of the

phenomenon covered are the following particular aspects of virtual currency use such as smart contracts and initial coin offerings comparative review of income tax consequences of virtual currency transactions in Germany the Netherlands the United Kingdom and the United States VAT sales tax treatment of transactions involving virtual currency in the European Union and the United States methodology for creating an effective regulatory framework for the taxation of virtual currency and the future of blockchain The book has three parts and an annex that describes tax regulations administrative rulings and court decisions concerning virtual currency in twenty countries In its in depth analysis of tax implications of virtual currency transactions in major economies detailed overview of recent tax developments that affect virtual currency transactions and evaluation of tax policies related to virtual currencies this book has no peers Especially in view of the OECD s examination of the tax challenges presented by the digital economy as part of its base erosion and pro t shifting BEPS project this clear and comprehensive explanation of the functioning of virtual currency and blockchain technology will be welcomed by tax administration of cials and by persons mining and transacting in virtual currencies needing to know their compliance State Tax Guide, All States Commerce Clearing House, 1991 Toolkit Tax Guide 2008 Toolkit Media obligations Group, Paul N. Gada, 2008 With expert commentary and line by line explanations this resource addresses the tax filing process while helping to minimize bills Detailed discussions focus on issues of primary importance to small business owners and help answer commonly asked questions such as Whatis the best form of organization for a given business How should personal and business expenses be differentiated How should employee benefit plans be handled on tax returns and What might the IRS look for when conducting an audit Free online information and support are included as are sections covering the latest changes to the federal U S Tax Code and an extensive glossary designed to clear up any confusion associated with tax jargon Sales and Use Tax .2013 Wisconsin Employer's Withholding Tax Guide ,2009-07 Wisconsin Withholding Tax Guide ,2012 Monthly Catalog of United States Government Publications ,1981 **Monthly** Catalogue, United States Public Documents .1981

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