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John C. Healy, Michael S. Schadewald



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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 Multistate Corporate Tax Guide CCH Editorial Staff Publication,2009-10-21 U.S. Master Multistate Corporate Tax Guide (2020) Cch Tax Law,2019-10-25 As a result of rapidly evolving commercial technological and economic dynamics more and more businesses conduct business across multiple state jurisdictions At the same time state tax rules have become significantly more complex and the states have become increasingly more aggressive in enforcing and collecting tax payment Now more than ever business taxpayers and their advisors need to understand the traps pitfalls and opportunities in the state corporate tax arena before the inevitable state corporate income tax audit becomes a reality Now available as an eBook CCH's U S Master Multistate Corporate Tax Guide is an indispensable resource for professionals who work with multiple state tax jurisdictions This CCH Master Guide serves as a handy desktop reference containing concise explanations on major corporate tax issues that are readily accessible and easy to understand It's an excellent resource for quick answers to the most asked questions and at a glance state to state comparisons The U S Master Multistate Corporate Tax Guide provides return preparation guidance for use by taxpayers subject to corporate income or income based taxes in more than one state It provides an efficient means for practitioners to understand the rules and guidelines relevant to filing returns in all of the 47 states plus New York City and the District of Columbia that impose a corporate income tax a franchise tax or other tax at least partially measured by income Key elements of this helpful and annually updated publication are CHARTS designed to provide quick answers to the most often asked questions regarding state corporate income taxation STATE BY STATE DISCUSSIONS offer practical explanations of major corporate tax topics including Tax Rates Tax Credits Apportionment of Income Combined Reporting Consolidated Returns Nexus Net Operating Loss Carryforwards and Carrybacks Return Filing Requirements Alternative Minimum Taxes Treatment of Flow through Entities In addition since most practitioners prepare federal forms first easy access to state law differences makes filling out state returns easier The Guide provides helpful comparisons of federal and state tax laws for each state HIGHLIGHTS OF KEY NEW DEVELOPMENTS presents a summary of key legislative and regulatory changes affecting state corporate income taxation during the previous year so readers are

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