Advance Tax Rulings And Principles Of Law Towards A European Advance Tax Rulings System Doctoral

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comprehensive study on the advance tax ruling the main procedural and substantive elements of current tax rulings systems worldwide are investigated and the legal principles underlying advance tax rulings procedures in the united states the netherlands and italy are identified in the final chapters an overview of the status quo of advance tax rulings systems in the european union

advance tax rulings are a common feature of mature tax systems the tax systems of the united states the united kingdom the netherlands germany australia and south africa all have established ruling practices taxpayers can obtain an advance tax ruling in nearly all oecd member countries increasingly many non oecd countries are also offering advance tax rulings an advance tax ruling regime seeks to promote clarity and consistency regarding the application of the tax law for both taxpayers and the tax authority however there are also inherent risks associated with the proliferation of granting confidential advance tax rulings which are not published or otherwise reported this tax law imf technical note

focuses on designing an advance tax ruling regime in the nature of private tax rulings

1935 42 decisions originally reported currently in the standard federal tax service and 1941 42 also in the federal estate and gift tax service and 19 in the federal excise tax reports

describing the tax in effect for 1988 and later years as provided for by the 1986 tax reform act this book offers clear concise explanations of the reasoning behind the federal income tax its interpretations and its application

the 2012 student update is accessible by clicking here this casebook is the first to provide interdisciplinary coverage of two exciting areas of the law intellectual property and taxation valuable business assets are increasingly in the form of intangible assets such as patents trade secrets copyrights trademarks trade names and computer software moreover with the arrival of global e commerce transactions on the internet new forms of intellectual property such as domain names and web contents have emerged the creation development acquisition and sale and licensing of these intellectual property assets have significant tax consequences authors maine and nguyen adopt the problem method in addressing intellectual property taxation and cover both general and special tax principles governing different forms of intellectual property the book s ten chapters are each devoted to the taxation of a major ip transaction such as intellectual property research and development acquisitions sales and licenses and judgment awards and settlements every chapter contains a set of relevant problems a summary of the black letter law and excerpts of important cases and administrative pronouncements

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