

Individual Taxation 2015 Edition

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the globalization of economic and multinational business structures has exacerbated the problem of substantive overlapping national tax laws in recent decades double taxation has a negative impact on international economic transactions because it leads to the suboptimal allocation of capital and affects the cross border exchange of goods therefore measures are needed to avoid international double taxation the number of international mutual agreement procedures is rising accordingly however the mutual agreement procedure is not always effective and is often evaded by developing countries in particular according to the author the deficits of the mutual agreement procedure should be mitigated by procedural and administrative rules these can be based on experiences gained from other areas of law with cross border economic activities moreover the use of modern technologies or non binding dispute resolution mechanisms can enhance the efficiency of the mutual agreement procedure the procedural and administrative rules should not only make the procedure more attractive for

states and especially developing countries but also improve the position of the taxpayer

the revised updated edition of the popular guide that helps you save thousands at tax time how to pay zero taxes 2015 provides simple strategies that are sure to save readers money this year next year and beyond from converting personal expenses into business deductions to avoiding or surviving an irs audit jeff schnepper s guide covers more deductions than any other tax book all conveniently organized into six easy access categories exclusions general deductions below the line deductions traditional tax shelters and super tax shelters jeff a schnepper esq is the author of multiple books on finance and taxation including all previous editions of how to pay zero taxes he is a financial tax and legal advisor for estate planning of delaware valley and operates a tax accounting and legal practice in cherry hill new jersey mr schnepper is microsoft s msn money tax expert an economics editor for usa today and tax counsel for haran watson company

time to discuss anti beps measures around digitalization in the course of the beps report on action 1 it was concluded that there was no instantaneous need for specific rules to address base erosion and profit shifting beps made possible by the digitalization of enterprises and new digital businesses at the same time it was acknowledged that general measures may not suffice with the assessment of results to begin in 2020 while awaiting possible fundamental reforms of the tax framework it is time to discuss anti beps measures bearing in mind the peculiar features of the digital economy such as increased mobility no need for physical presence and dematerialization the book focuses on five key areas of interest international tax policytax treaty lawtransfer pricingindirect taxation issueseu law taxation in a global digital economy analyses the issues and addresses the five key areas of interest from various viewpoints

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detailed research on the un model convention s unique features the un model convention has a significant influence on international tax treaty practice and is especially used by emerging and developing countries as a starting point for treaty negotiations driven by the aim to achieve consistency in the international tax treaty practice the structure and content is to a large extent similar in the un model and the oecd model however whereas the oecd has historically focused its efforts on issues mainly relevant for developed countries the un tax committee has continuously attempted to specifically take into account tax treaty policies for developing countries when drafting and amending the un model convention compared to the oecd model convention the un model convention aims at giving more weight to the source principle popular examples are the pe definition in the un model which provides for a lower threshold than article 5 of the oecd model or article 12a on fees for technical services which has been introduced with the latest amendment of the un model convention 2017 and allows for a withholding tax to be levied on payments to non residents when the payer of the fee is a resident of that contracting state irrespective of where the services are provided interestingly in the discussions of the tax challenges arising from the digitalization of the economy the oecd and the g20 are also exploring options to allocate more taxing rights to the jurisdiction of the customer and or user i e the market jurisdictions as this has traditionally been the focus of the un model convention its unique features and developing countries practices could be taken into account when exploring new nexus rules that are not constrained by the physical presence requirement this book contains the master s theses of the full time ll m program 2018 2019 for which special features of the un model convention has been chosen as the general topic with this book the authors and editors do not aim at discussing each article of the un model convention but rather focus on the unique features of the un model convention which are explored in detail this is

supplemented with an evaluation of the function and relevance of the un tax committee in the international tax policy discussion and with an analysis of the influences of the oecd s beps project on the un model

gain a solid understanding of federal taxation using the proven balanced conceptual approach in concepts in federal taxation 2015 this edition presents today s latest tax codes and changes with a straightforward approach that focuses on understanding the unifying concepts behind the internal revenue code rather than memorizing the details of the code all changes for the recent tax year are included in this revision material throughout this edition is broken into comprehensible segments ideal for cpa exam review extensive examples relate concepts to familiar business scenarios while a wealth and variety of exercises provide more choice in practice than any other text of its kind new cengagenow tm online homework tool optimizes your study while accompanying h r block tm tax preparation software provides experience using professional research and taxation tools count on concepts in federal taxation 2015 for the strong conceptual understanding of taxation you need for ongoing success

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