

Federal Tax Research 10th Solution

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Journal of the Society of Dyers and Colourists
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Lexis-Nexis for Law Students
Taxing Africa
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John Hasseldine
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New York (State). Legislature
Walter Yust
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National Tax Association
University of North Carolina (1793-1962)
Society of Dyers and Colourists, Bradford, Eng. (Yorkshire)
New York (State). State Tax Commission
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Graduate School
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tax researchers have an important role to play in conducting and publishing rigorous quality research in the uncertain times facing the world's tax systems there are many research questions to be addressed and advances in taxation invites submissions on a broad range of tax topics

these are papers from the 10th cambridge tax law history conference which took place in july 2020 the papers fall within the following basic themes uk tax administration issues uk tax reforms in the 20th century history of tax in the uk the uk s first double tax treaty the 1982 australia us tax treaty the legacy of colonial influence reform of dutch excises and canadian tax avoidance

advance pricing agreements or arrangements apas are designed as a dispute prevention mechanism for transfer pricing related issues and provide certainty to taxpayers on taxation of cross border transactions since the apa procedure was introduced by tax authorities in the late 1980s it has gradually taken hold worldwide and evolved along several dimensions with important characteristics this book the first exclusively dedicated to the global apa regime provides a comprehensive in depth discussion of the apa concepts and procedures in twenty five jurisdictions across europe asia asia pacific north america south america and africa noting the particular genesis features and progress made under each programme the analysis covers such elements as the following the types of apas and their characteristics the main steps involved in an apa process key advantages of apa programme and comparative study of the apa as a preferred dispute prevention mechanism over other dispute resolution mechanisms key issues observed and in practice by various apa authorities worldwide inter alia involving cost base of captive entities resolution of transfer pricing issues involving intangibles location savings joint site visits attribution of profits to pes apas for small businesses abbreviated procedure for renewal of apas significance of economic nexus prior to the grant of apas and other relevant issues exchange of apa rulings equip tax authorities to quickly identify risk areas so as to curb base erosion and profits shifting beps which augurs well for the apa programme and is another milestone in its evolution process apas provide jurisdictions with an excellent platform to fostering a non adversarial tax regime the author includes an extended case study of india s apa programme highlighting some of its conspicuous elements with equal focus on certain special characteristics of apas in australia canada france germany ireland korea the netherlands poland uk and the united states factors influencing speedier processing and suggestions on further improvement of apa programmes are also included numerous tables and figures illustrate all aspects associated with apas with more economies opening up and the worldwide implementation of the oecd g20 beps action reports in an endeavour to combat beps access and recourse to apas is sure to grow this invaluable book will enable tax administrations to learn from each other s experiences and help to prevent costly and time consuming transfer pricing audits and litigation for multinational enterprises the book will be welcomed by revenue officials professionals and advisors concerned with international taxation as well as by tax law academics

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taxation has been seen as the domain of charisma free accountants lawyers and number crunchers an unlikely place to encounter big societal questions about democracy equity or good governance yet it is exactly these issues that pervade conversations about taxation among policymakers tax collectors civil society activists journalists and foreign aid donors in africa today tax has become viewed as central to african development written by leading international experts taxing africa offers a cutting edge analysis on all aspects of the continent s tax regime displaying the crucial role such arrangements have on attempts to create social justice and push economic advancement from tax evasion by multinational corporations and african elites to how ordinary people navigate complex webs of informal local taxation the book examines the potential for reform and how space might be created for enabling locally led strategies

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