FEDERAL INCOME TAXATION OF CORPORATIONS AND SHAREHOLDERS

BORIS I. BITTKER JAMES S. EUSTICE

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Taxation Of Corporations And Their Shareholders

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Taxation Of Corporations And Their Shareholders:

The Taxation of Corporations and Their Shareholders David J. Shakow, 1991 The Taxation of Corporations and **Shareholders** Martin Norr, 2013-06-29 This monograph is principally the work of the late Martin Norr He completed a draft of the entire monograph but had not yet revised it when he died in late 1972 At that time the integration of corporate and shareholder taxation was just beginning to become of widespread interest in the United States With the increasing interest thereafter the International Tax Program began to revise his manuscript making as few changes as possible in the original draft We had the benefit of criticism and analysis from Professor Richard M Bird of the University of Toronto now Director of the Institute of Policy Analysis there In addition Mr Mitsuo Sato of the Ministry of Finance in Japan gave freely of his time in carefully suggesting changes throughout the manuscript The present version of Chapter 3 owes a great deal to his additions and suggestions Thanks are also due to Professor Hugh J Ault of Boston College Law School for the Appendix containing his description of the German integration system that became effective in 1977 which was first published in Law Policy in International Business Mr Norr s interest in the subject of corporate and shareholder taxation developed while he was writing the International Tax Program's World Tax Series volume Taxation in France published in 1966 The integration of French taxes on corporations and shareholders took place just after that volume was finished but had been under discussion Tax Aspects of Acquisitions and Mergers United States. Congress. House. in France for some time before then Committee on Ways and Means. Subcommittee on Oversight, 1985 The Taxation of Corporations Edwin Robert Tax Havens and Their Use by United States Taxpayers Richard A. Gordon, 1981 Overview of tax Anderson Seligman, 1890 havens and the use of tax havens by US taxpayers The study sought to determine the frequency and nature of tax haven transactions identify specific types of tax haven transactions obtain a description of the US and foreign legal and regulatory environment in which tax haven transactions are conducted describe the IRS and Justice Department efforts to deal with tax haven related transactions and to identify interagency coordination problems Taxation of Corporations in New York, Massachusetts, Pennsylvania and New Jersey Robert Harvey Whitten, 1901 The International Taxation System Andrew Lymer, John Hasseldine, 2012-12-06 International taxation is a vital issue for a growing number of business and individuals across the world The need to understand how the international system of taxation works is therefore a subject of importance to many people The International Taxation System provides this understanding by bringing together experts from the most important fields in the subject who have each authored chapters especially for this book They each provide brief structured and easy to understand explanations of the key concepts edited together into one volume to provide a unique very readable guide to the field While this text is aimed at masters or advanced undergraduate level students it will also be of interest to those requiring a professional understanding of the topic Each chapter introduces a different aspect of the international taxation system explains the important issues to be understood in each case and provides suggestions for discussion and

Tax Havens and Their Use by United States Taxpayers - An Overview Richard A. Gordon, 2002-08 This further reading book was written at the request of the Commissioner of Internal Revenue The Assistant Attorney General Tax Division and the Assistant Secretary of the Treasury Tax Policy The purpose of this book was to develop an overview of tax havens and the use of tax havens by United States taxpayers The study sought to determine the frequency and nature of tax haven transactions identify specific types of tax haven transactions obtain a description of the United States and foreign legal and regulatory environment in which tax haven transactions are conducted describe Internal Revenue Service and Justice Department efforts to deal with tax haven related transactions and to identify interagency coordination problems The findings are based on a review of judicial decisions and published literature in the field of international tax planning research into internal IRS documents concerning taxpayer activities interviews with IRS personnel personnel who deal with tax haven issues for other Federal government agencies and lawyers and certified public accountants who specialize in international taxation The findings are also based on a statistical analysis of available data concerning international banking United States direct investment abroad and foreign investment in the United States While the findings did not uncover all the methods employed to use tax havens the belief is that the inquiry was extensive enough to give an understanding of the situation and to enable the IRS to develop options which might be useful in improving the administration of the tax laws as they apply to The Taxation of Corporations in Massachusetts ... Harry George Friedman, 1907 **Essays in International** tax havens Taxation, 1976 United States. Department of the Treasury, 1977 The essays analyse the interactions between tax law and tax policy. The analyses evaluate changes which presuppose the foreign tax credit mechanism the separate taxation of corporations and their shareholders and other basic elements in US taxation of foreign income Proposals Relating to Tax Shelters and Other Tax-motivated Transactions United States. Congress. House. Committee on Ways and Means, 1984

State Taxation of National Banks United States. Congress. House. Committee on Banking and Currency, 1928 <u>Essays in Taxation</u> Edwin Robert Anderson Seligman, 1921 **The Corporate Records Handbook** Anthony Mancuso, 2022-07-04 Keep your corporate status and avoid personal liability Incorporating your business is an important first step in obtaining limited liability status To keep that status you must observe a number of legal formalities including holding and documenting shareholder and director meetings Meeting minutes are the primary paper trail of a corporation s legal life and The Corporate Records Handbook provides all the instructions and forms you need to prepare them Minutes forms include Notice of Meeting Shareholder Proxy Minutes of Annual Shareholders Meeting Minutes of Annual Directors Meeting Waiver of Notice of Meeting and Written Consent to Action Without Meeting You ll also find more than 75 additional resolutions that let you elect S corporation tax status adopt pension and profit sharing plans set up employee benefit plans amend articles and bylaws borrow or lend money authorize bank loans authorize a corporate line of credit purchase or lease a company car and more With Downloadable Forms All forms are available for download instructions inside the book <u>The President's 1978</u>

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Taxation Reuven S. Avi-Yonah,2023-08-14 Encapsulating the multitude of challenges faced by the international corporate tax regime this timely Research Handbook provides an in depth comparative legal analysis of corporate income tax as it is practiced across the world With a variety of paths to reform proposed throughout it will prove an invigorating read for tax scholars working on taxation and tax law as well as for tax practitioners and those in fiscal policy seeking ways to improve or navigate the current state of affairs in international corporate tax law

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