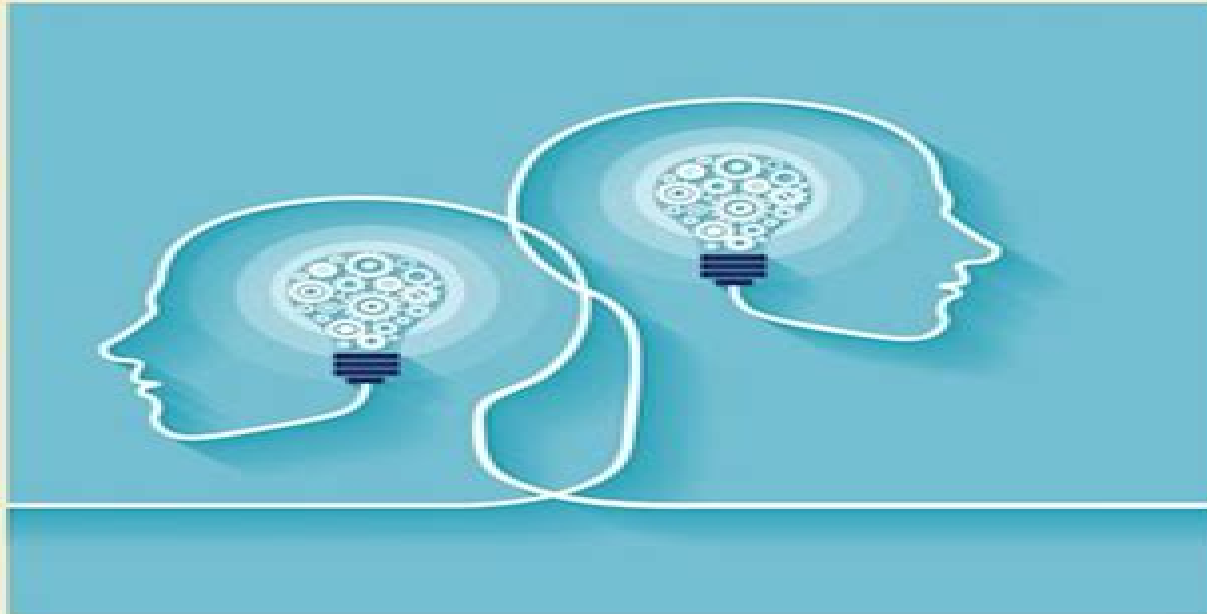


Taxation of Intellectual Property



Fifth Edition

Julian Hickey
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Taxation Of Intellectual Property

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Taxation Of Intellectual Property:

Federal Taxation of Intellectual Property Transfers , **Federal Taxation of Intellectual Property Transfers** Joseph E. Olson,1986 **Taxation of Intellectual Property** Daniel W. Matthews,2011 This book builds upon the core concepts introduced in a basic income tax course such as capitalization depreciation amortization and characterization of income loss by specifically addressing their application to intellectual property IP In some cases special rules apply the core concepts differently to IP This book s goal is to discuss these special IP tax rules and the policy concerns underlying them Additionally this book goes beyond the core concepts and addresses tax issues truly unique to IP such as IP holding companies and international IP transactions Specifically this book discusses how multistate corporations use intangible holding companies to minimize exposure to state corporate income taxes The final chapter covers how U S multinationals use IP in international transactions to minimize exposure to U S income tax About the author Daniel W Matthews is an Associate Professor at the Thomas M Cooley Law School Prior to joining Cooley in 2003 Professor Matthews practiced at a prominent Michigan law firm and served as a tax consultant at Deloitte Touche Professor Matthews earned an LL M degree in Taxation from New York University and was awarded a Juris Doctor summa cum laude from Michigan State University College of Law

Taxation of Intellectual Property Anne Fairpo,2012-12-31 This specialist book examines the approach of the UK tax regime towards intellectual property This unique approach follows step by step the lifecycle of an intellectual property asset and highlights the tax considerations and planning issues Taxation of Intellectual Property is a must have book for all tax and accountancy practitioners advising commercial organisations of all sizes Benefit from Anne Fairpo s specialist knowledge and know how **Intellectual Property** Richard J. Gallafent,Nigel A. Eastaway,Victor A. F. Dauppe,1992 Part one considers the basic concepts behind the different areas of intellectual property how to obtain legal protection and in what form Part two considers those issues discussed in part one from a tax point of view Supporting material such as standard agreements and IRS rulings is included *Taxation of Intellectual Property* Julian J. B. Hickey,1998 **Taxation of Intellectual Property Under Domestic Law, EU Law and Tax Treaties** Guglielmo Maisto,2020 Taxation of Intellectual Property Fairpo,2002-01-01 Tolley s Taxation of Intellectual Property considers the lifecycle of an Intellectual Property asset from creation to disposal and looks at the tax implications including tax planning opportunities at each stage Special features include case studies for each chapter interviews with a range of Intellectual Property orientated companies operating in the UK and highlighting of commercial issues making this unique book even more practical *Taxation of Intellectual Property* Marvin Petry,1985 Taxation of Intellectual Property Anthony Pickford,David Raymond Harris,1993 Intellectual property is of day to day concern for many companies and it is important for them to keep up with its taxation This book deals with the tax aspect including the international position of all the main areas of intellectual property including copyright patents royalties and trademarks and as such is an essential text for tax advisers solicitors and commercial tax managers

Taxation of Intellectual Property Under Domestic Law, EU Law and Tax Treaties Guglielmo Maisto, 2018 Taxation of Intellectual Property under Domestic Law EU Law and Tax Treaties comprising the proceedings and working documents of an annual seminar held in Milan in November 2017 is a detailed and comprehensive study on the taxation of intellectual property IP It begins with a comparative analysis of the domestic private law aspects of IP and the domestic tax regimes applicable to profits deriving from the utilization of IP It next examines the taxation of IP under EU law with a particular emphasis on i the EU fundamental freedoms and State aid and ii the open issues in the implementation of the EU Interest and Royalty Directive The book then moves to selected tax treaty issues In particular it analyses i the historical background and the policy of article 12 of the OECD Model Convention ii the meaning of royalties and overlapping between articles 7 12 and 13 of the OECD Model Convention iii royalties in the context of the OECD Multilateral Instrument under the limitation on benefits LoB provision and the principal purpose test PPT clause and iv certain selected issues on cross border transfers of IP Individual country surveys provide an in depth analysis of the domestic tax regimes and actual tax treaty application and practices by various states including Australia Austria Brazil Canada China People s Rep France Germany Italy the Netherlands Spain Switzerland the United Kingdom and the United States Intellectual Property Taxation Jeffrey A. Maine, Xuan-Thao N. Nguyen, 2004 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

The International Taxation System Andrew Lymer, John Hasseldine, 2002-08-31 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 further reading The Intellectual Property Holding Company Jeffrey A. Maine,Xuan-Thao Nguyen,2017-12-07 This book investigates how some corporations have avoided tax liability with intellectual property holding companies and how different constituencies are working to stop them

US Taxation of Foreign Income Gary Clyde Hufbauer,2007 *Taxation of Intellectual Property and Technology* Kenneth R. Appleby,Marvin Petry, *Taxation of Intellectual Property* Jeffrey A. Maine,Xuan-Thao N. Nguyen,2021 International Taxation of Manufacturing and Distribution John Abrahamson,2016-02-18 The most thorough treatment of its subject available this book introduces and analyses the international tax issues relating to international manufacturing and distribution activities extending from the tax regime in the country where the manufacturing activities are located through to regional purchase and sales companies to the taxation of local country sales companies The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends Among the topics and issues analysed in depth are the following foreign tax credits taxation in the digital economy tax incentives intellectual property group treasury companies mergers and acquisitions leasing derivatives controlled foreign corporation provisions VAT and customs tariffs free trade agreements and customs unions transfer pricing role of tax treaties hedging related accounting issues deferred tax assets and liabilities tax risk management supply chain management depreciation allowances and carry forward tax losses The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples Detailed up to date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting BEPS and other measures against tax avoidance As a full scale commentary and analysis of international taxation issues for multinational manufacturing groups including in depth consideration of corporate structures tax treaties transfer pricing and current developments this book is without peer It will prove of inestimable value to all accountants lawyers economists financial managers and government officials working in international trade environments Taxation of Intellectual Property:. Julian Hickey and Zeeshan Khilji,2022 This specialist title analyses the approach of the UK tax regime towards intellectual property assets Following the life cycle of intellectual property from creation to disposal the commentary highlights the tax considerations and planning issues for individuals non corporate entities and companies A separate chapter deals with international issues including UK tax residence transfer pricing and controlled foreign companies This new edition of Taxation of Intellectual Property will be updated by Julian Hickey of Old Square Tax Chambers and Zeeshan Khilji of ETC Tax Two new chapters are added to this edition one dealing with crypto assets and the other providing guidance on dealing with disputes enquiries and appeals focussing on the practical issues advisors need to think about *Taxation of Intellectual Property and Technology* ,2007

Uncover the mysteries within is enigmatic creation, **Taxation Of Intellectual Property** . This downloadable ebook, shrouded in suspense, is available in a PDF format (*). Dive into a world of uncertainty and anticipation. Download now to unravel the secrets hidden within the pages.

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