# FEDERAL INCOME TAXATION OF CORPORATIONS AND SHAREHOLDERS

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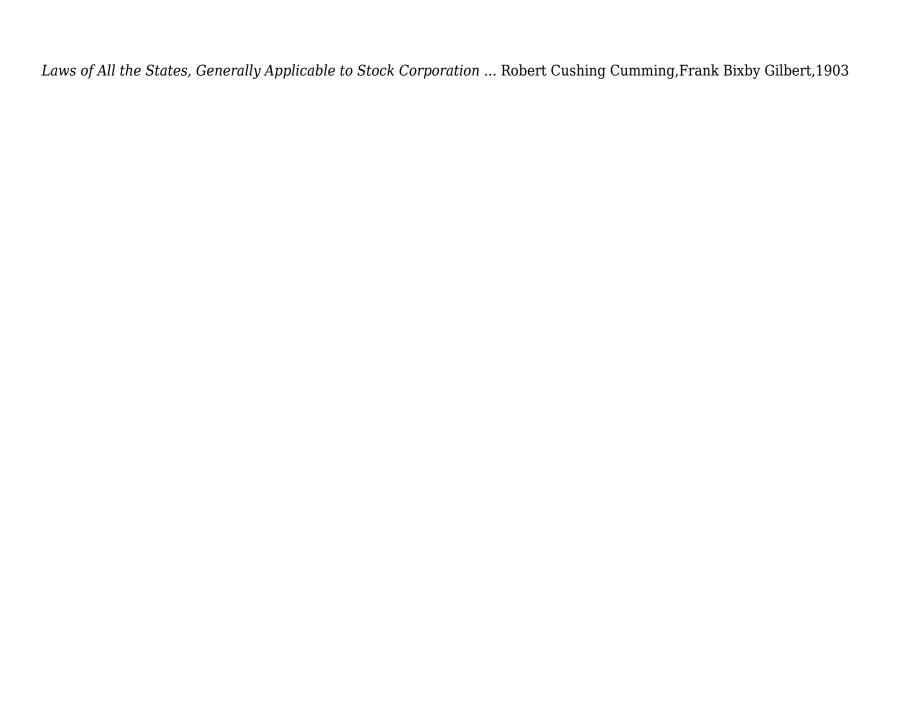
# **Taxation Of Corporations And Their Shareholders**

Robert Cushing Cumming, Frank Bixby Gilbert

#### **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 in France for some time before then Taxation of Corporations in New York, Massachusetts, Pennsylvania and New Jersey Robert Harvey Whitten, 1901 Tax Havens and Their Use by United States Taxpayers Richard A. Gordon, 1981 Overview of tax 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 Tax Havens and Their Use by United States Taxpayers - An Overview Richard A. Gordon, 2002-08 This 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 tax havens The Taxation of Corporations in Massachusetts ... Harry George Friedman, 1907 The Taxation of Corporations and Their Shareholders, 1980 Income Taxation of Corporations Martin J. McMahon Jr., Daniel L. Simmons, Charlene Luke, Bret Wells, 2019-08-15 The 5th Edition explores the federal income taxation of corporations and their shareholders and can be used in a variety of courses covering corporate taxation at either the J D or LL M level Numerous important revisions to the statutory structure over the past few decades the changing magnitude of the capital gain preference the preferential rate for dividends the 2017 reduction to the corporate tax rate a maximum individual rate now substantially higher than the maximum corporate rate and repeal of the General Utilities rule providing nonrecognition of gain upon the distribution of property by a corporation have changed dramatically the important issues Most chapters and sections of chapters are introduced by a textual discussion or outline of the basic issues and structure of the statute governing treatment of the particular item or transaction covered in the chapter or section This is followed by a principal case reading generally a judicial decision but sometimes an IRS ruling or legislative history excerpt A Detailed Analysis follows the principal case reading and is intended to facilitate the professor s ability to tailor the class to the needs of a particular course through selecting portions of that analysis Class Discussion Problems are incorporated directly into the text In selecting and organizing the materials we have attempted to maximize the usefulness of these materials for whatever approach the professor wishes to adopt an intensive technical analysis a problem oriented method a consideration of the policies that underlie the technical tax structure or a survey of the principal elements of the federal income taxation of corporations State Taxation of National Banks United States. Congress. House. Committee on Banking and Currency, 1928 **Hearings** United States. Congress. House. Committee on Banking and **Essays in Taxation** Edwin Robert Anderson Seligman, 1921 Currency, 1928 Comparative Summary and Index of State Legislation New York State Library, 1900 Minutely classified annual summaries of all new laws passed by the states followed by a full alphabetic index of specific topics Wisconsin Tax Treatment of Tax Option (S) Corporations and Their Shareholders ,2000-12 Final Report of the California Tax Commission California. State Tax Commission, 1929 Cases Argued and Decided in the Supreme Court of the United States ,1919 Federal Income Taxation of Corporations and Stockholders in a Nutshell Peter P. Weidenbruch, Karen C. Burke, 1989 Introduces several fundamental issues in the taxation of corporations and stockholders and focuses on the corporation as a taxable entity provides an overview of the taxation of S corporations and discusses various reform proposals with emphasis on corporate shareholder integration The Massachusetts register .1991 Statistics of Income ,1995 The Pacific Reporter ,1918 *The Annotated Corporation* 



#### Taxation Of Corporations And Their Shareholders Book Review: Unveiling the Magic of Language

In an electronic digital era where connections and knowledge reign supreme, the enchanting power of language has be much more apparent than ever. Its power to stir emotions, provoke thought, and instigate transformation is actually remarkable. This extraordinary book, aptly titled "**Taxation Of Corporations And Their Shareholders**," published by a very acclaimed author, immerses readers in a captivating exploration of the significance of language and its profound affect our existence. Throughout this critique, we shall delve to the book is central themes, evaluate its unique writing style, and assess its overall influence on its readership.

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