

Longview Consolidation Corporate Tax Software

The Taxation of Corporate Groups Under Consolidation Combination, Consolidation and Succession of Corporations Tax Strategies for Corporate Acquisitions, Dispositions, Spin-offs, Joint Ventures and Other Strategic Alliances, Financings, Reorganizations and Restructurings Will Corporate Tax Consolidation Improve Efficiency in the EU? Reports of Cases Heard and Determined in the Supreme Court of the State of New York The Railway and Corporation Law Journal Reports of Cases Argued and Determined in the Supreme Court of Judicature of the State of Indiana The Consolidated Laws of the State of New York Lawyers' Reports Annotated Taxation of Corporations and Personal Income in New York General Statutes of Kansas, 1889 The American and English Railroad Cases A Common Consolidated Corporate Tax Base for Europe – Eine einheitliche Körperschaftsteuerbemessungsgrundlage für Europa The American Railway Reports Guide to Japanese Taxes Reports of Cases Decided in the Court of Appeals of the State of New York Reports of Cases The Northwestern Reporter Report of State Officers, Board and Committees to the General Assembly of the State of South Carolina Reorganizations, Mergers, Or Consolidations Antony Ting Andrew Jackson Hirschl Albert van der Horst Marcus Tullius Hun Indiana. Supreme Court New York (State). Henry Montefiore Powell Kansas Lawrence Lewis (Jr.) Wolfgang Schön New York (State). Court of Appeals New York (State). Court of Appeals South Carolina. General Assembly Corporation Trust Company The Taxation of Corporate Groups Under Consolidation Combination, Consolidation and Succession of Corporations Tax Strategies for Corporate Acquisitions, Dispositions, Spin-offs, Joint Ventures and Other Strategic Alliances, Financings, Reorganizations and Restructurings Will Corporate

Tax Consolidation Improve Efficiency in the EU? Reports of Cases Heard and Determined in the Supreme Court of the State of New York The Railway and Corporation Law Journal Reports of Cases Argued and Determined in the Supreme Court of Judicature of the State of Indiana The Consolidated Laws of the State of New York Lawyers' Reports Annotated Taxation of Corporations and Personal Income in New York General Statutes of Kansas, 1889 The American and English Railroad Cases A Common Consolidated Corporate Tax Base for Europe – Eine einheitliche Körperschaftsteuerbemessungsgrundlage für Europa The American Railway Reports Guide to Japanese Taxes Reports of Cases Decided in the Court of Appeals of the State of New York Reports of Cases The Northwestern Reporter Report of State Officers, Board and Committees to the General Assembly of the State of South Carolina Reorganizations, Mergers, Or Consolidations *Antony Ting Andrew Jackson Hirschl Albert van der Horst Marcus Tullius Hun Indiana. Supreme Court New York (State). Henry Montefiore Powell Kansas Lawrence Lewis (Jr.) Wolfgang Schön New York (State). Court of Appeals New York (State). Court of Appeals South Carolina. General Assembly Corporation Trust Company*

the rise of corporate groups in the last century dictates a shift in the income tax law instead of treating each company as a separate taxpayer the tax consolidation regime is increasingly common antony ting presents the first comprehensive comparative study of eight consolidation regimes in australia france italy japan the netherlands new zealand spain and the usa in the study he critically analyses and compares alternative policy options with respect to ten key structural elements the study improves understanding of the design and implementation of consolidation regimes and sets the stage for the search for a model it provides valuable information with respect to the best practices as well as the pitfalls in the design of a consolidation regime the book is essential to countries contemplating the introduction of a new consolidation regime and offers important insights into the management of such a complex structure through careful policy orientated choices

consolidation of the tax base in the european union is expected to curve compliance costs and reduce prodit shifting a number of proposals for

consolidation from the european commission are simulated with the applied general equilibrium model cortax we show that benefits from consolidation are offset by two weaknesses in the proposals for a common consolidated tax base formula apportionment which is needed to allocate the consolidated taxable profits across jurisdiction creates new tax planning possibilities for mnes and allows them to benefit from existing tax rate differentials in the european union in addition it triggers tax competition as member states may attract foreign investment by reducing their tax rates the second distortion is an unlevel playing field which is introduced if only part of the firm participate in the consolidation the gains from consolidation can be fully grasped if it is obliged for all firms and is it is accompanied by a harmonisation of the tax rate

descriptors laws statutes

preface this book contains the proceedings of the international tax conference on the common consolidated corporate tax base ccctb that was held in berlin on 15 16 may 2007 the conference was jointly organised by the german federal ministry of finance the centre for european economic research zew mannheim and the max planck institute mpi for intellectual property competition and tax law munich more than 250 participants from all over europe and other regions scholars politicians business people and tax administrators discussed the european commission's proposal to establish a ccctb three panels of tax experts evaluated the common tax base with respect to structural elements consolidation allocation international aspects and administration the conference made clear that the ccctb has the potential to overcome some of the most intriguing problems of corporate income taxation within the common market common tax accounting rules substantially reduce compliance and administrative costs consolidation of a group's profits and losses effects cross border loss compensation which removes a major tax obstacle for european cross border investment at the same time tax planning with respect to financing and transfer pricing is pushed

back within the european union moreover as far as the ccctb applies member states are able to remove tax provisions that are targeted at cross border tax evasion and that might be challenged by the jurisdiction of the eu pean court of justice

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