Fiscal Slim 102

Arturo Cuomo

Resources in Education ,1993-04

Finance and Development Christopher J. Green, Colin Kirkpatrick, Victor Murinde, 2006-01-01 In this new book a group of 18 distinguished authors presents comprehensive surveys of current issues in the field of finance and development. . . This book nicely bridges the gap between general research on the role of finance for economic growth and the role finance plays for developing economies and poverty reduction. . . Moreover, the authors identify a great number of promising ideas for future research. . . Ryszard Kokoszczynski, SUERF Newsletter The European Money & Finance Forum In the last two decades, the role of finance in the development process has become a major topic of research and debate. Although it is widely agreed that there is an important link between the two, there is much less consensus on the exact nature of the relationship. Is financial development a prerequisite for general economic development, or is it a more passive by-product of the development process? In this valuable new book, a distinguished group of authors takes stock of the existing state of knowledge in the field of finance and the development process. Each chapter offers a comprehensive survey and synthesis of current issues. These include such critical subjects as savings, financial markets and the macroeconomy, stock market development, financial regulation, foreign investment and aid, financing livelihoods, microfinance, rural financial markets, small and medium enterprises, corporate finance and banking. This book will be accessible to postgraduate and advanced undergraduate students of finance and development. It will also be an essential reference source for all professionals and academics working in this area who want to learn how finance can contribute to the development process and poverty reduction.

Non-discrimination in Tax Treaty Law and World Trade Law Kasper Dziurdź, 2019-07-23 Non-discrimination is a central obligation under both tax treaty and trade law. However, in seeking to strike a balance between national and international interests, its application differs in the two areas of practice. This deeply researched and authoritative work, which explains the policy issues and how non-discrimination analysis works, provides a comprehensive review of non-discrimination rules in WTO and tax treaty law, combining a critical commentary on case law with proposals for an innovative concept for solving cases of discrimination in tax treaty law. Among the practical issues affecting non-discrimination examined in detail are the following: implications that can be drawn from the concepts of non-discrimination under WTO law and Article 24 of the OECD Model; direct and indirect discrimination and analysis of comparability in WTO law and tax treaty law; the MFN and NT rules under the GATT and GATS; the meaning of 'likeness' and 'less favourable treatment'; claiming non-discriminatory tax treatment before tax administrations and courts under a tax treaty; justification of measures against harmful tax competition, low taxation and hybrid mismatch arrangements; thin capitalisation rules, progressive tax rates, foreign losses, group taxation and relief from juridical and economic double taxation under Article 24 of the OECD Model; and integrating a justification defence into any stage of a non-discrimination analysis. The author establishes to what extent formal, substantive and subjective approaches may be applied in a non-discrimination analysis, providing the reasons for the approaches taken. A two-step comparability procedure is applied to selected cases of potential tax discrimination, demonstrating how policy arguments can be addressed under Article 24 of the OECD Model. Drawing on over a half-century of case law in both areas of practice, this comprehensive study of the non-discrimination rules under WTO law and international tax law will be invaluable in systematically solving cases of tax discrimination under Article 24 of the OECD Model and putting forward arguments at any stage of a WTO analysis. Policymakers will benefit from the author's clear explanation of how national law should comply with international obligations. Also, taxpayers' advisers will proceed confidently in claims of tax treaty discrimination, and academics will discover an incomparable overview and analysis of anti-discrimination rules in international trade law and double taxation conventions.

AEC Authorizing Legislation, Fiscal Year 1974 United States. Congress. Joint Committee on Atomic Energy, 1973

U.S. Foreign Agricultural Trade Statistical Report, Fiscal Year ... ,

Judicial Interpretation of Tax Treaties Carlo Garbarino, 2016-10-28 Judicial Interpretation of Tax Treaties is a detailed analytical guide to the interpretation of tax treaties at the national level. The book focuses on how domestic courts interpret and apply the OECD Commentary to OECD Model Tax Convention on Income and on Capital. Adopting a global perspective, the book gives a systematic presentation of the main interpretive proposals put forward by the OECD Commentary, and analyses selected cases decided in domestic tax systems in order to assess whether and how such solutions are adopted through national judicial process, and indeed which of these are of most practical value. The book operates on two levels: firstly it sets out a clear and comprehensive framework of tax treaty law, which will be an important tool for any tax practitioner. Secondly, the book provides crucial guidance on issues of tax treaty law as applied at domestic level, such as investment or business income, dispute resolution and administrative cooperation. Monthly Catalog of United States Government Publications United States. Superintendent of Documents, 1991 February issue includes Appendix entitled Directory of United States Government periodicals and

subscription publications; September issue includes List of depository libraries; June and December issues include semiannual index

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The International Tax Law Concept of Dividend Marjaana Helminen, 2017-05-02 The distribution of profits between corporations resident in different jurisdictions gives rise to both significant tax planning opportunities and tax risks. As cross-border transactions between corporations grow in number and complexity, the question of how a profit distribution is classified for corporate income tax purposes becomes increasingly important, particularly in the context of issues such as double taxation, non-taxation and tax neutrality. The OECD BEPS project has only increased the relevance. This unique work discusses the international tax law rules determining which transactions may be classified and taxed as dividends and how possible classification conflicts may be resolved. The author examines the tax classification of various intercorporate transactions, including: - Payments made under dividend-stripping arrangements. - Fictitious profit distributions. - Economic benefits in the context of transfer pricing. - Returns on debt-equity hybrids. -Interest payments in thin capitalization situations and distributions following liquidation. The analysis of each transaction refers to international tax law. Most weight is given to tax treaties and EU tax law, including the BEPS development. The approaches adopted in different states' national tax law are covered by a more general analysis. The comprehensive coverage and the practical nature of The International Tax Law Concept of Dividend make it an essential acquisition for tax practitioners, researchers and tax libraries worldwide.

Handbook of Economic Nationalism Pickel, Andreas, 2022-10-13 This cutting-edge Handbook puts economic nationalism in its historical context, from early industrialization to globalization. It explores how economic nationalism has emerged to new prominence in the post-globalization era as states are trying to protect their economies, societies, and cultures from unwanted external influences. Energy and Water Development Appropriations for Fiscal Year 2005 United States. Congress. Senate. Committee on Appropriations. Subcommittee on Energy and Water Development, 2005

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Cambridge Yearbook of European Legal Studies, Vol 9, 2006-2007 Catherine Barnard, 2007-12-18 The Cambridge Yearbook of European Legal Studies provides a forum for the scrutiny of significant issues in EU

Law, the Law of the Council of Europe, and Comparative Law with a 'European' dimension, and particularly those issues which have come to the fore during the year preceding publication. The contributions appearing in the collection are commissioned by the Centre for European Legal Studies (CELS) Cambridge, a research centre in the Law Faculty of the University of Cambridge specialising in European legal issues. The papers presented are all at the cutting edge of the fields which they address, and reflect the views of recognised experts drawn from the University world, legal practice, and the civil services of both the EU and its Member States. Inclusion of the comparative dimension brings a fresh perspective to the study of European law, and highlights the effects of globalisation of the law more generally, and the resulting cross fertilisation of norms and ideas that has occurred among previously sovereign and separate legal orders. The Cambridge Yearbook of European Legal Studies is an invaluable resource for those wishing to keep pace with legal developments in the fast moving world of European integration. INDIVIDUAL CHAPTERS Please click on the link below to purchase individual chapters from Volume 9 through Ingenta Connect: www.ingentaconnect.com SUBSCRIPTION TO SERIES To place an annual online subscription or a print standing order through Hart Publishing please click on the link below. Please note that any customers who have a standing order for the printed volumes will now be entitled to free online access. www.hartjournals.co.uk/cyels/subs Editorial Advisory Board Albertina Albors-Llorens Catherine Barnard John Bell Alan Dashwood Simon Deakin David Feldman Richard Fentiman Angus Johnston Claire Kilpatrick John Spencer Founding Editors Alan Dashwood Angela Ward

The American University Tax Institute Lectures ,1953

Model Tax Convention on Income and on Capital: Condensed Version September 1992 OECD, 1992-10-19 Condensed version of the loose-leaf publication Model tax convention on income and capital, containing the full text of the September 1992 Model Tax Convention, but omitting the historical notes and annexes, which include a detailed list of tax conventions between OECD member countries and the text of the Recommendation of 23 July 1992 from the OECD Council.

ERDA Authorizing Legislation, Fiscal Year 1976 United States. Congress. Joint Committee on Atomic Energy, 1975

Transfer Pricing and the Arm's Length Principle in International Tax Law Jens Wittendorff, 2010-01-01 The arm's length principle serves as the domestic and international standard to evaluate transfer prices between members of multinational enterprises for tax purposes. The OECD has adopted the arm's length principle in Article 9 of its Model Income Tax Convention in order to ensure that transfer prices between members of multinational enterprises correspond to those that would have been agreed between independent enterprises under comparable circumstances. The arm's length principle provides the legal framework for governments to have their fair share of taxes, and for enterprises to avoid double taxation on their profits. This timely book contains a comparative analysis of the legal basis for the arm's length principle and the contents of the arm's length rules in US tax law as well as in the OECD Model Tax Convention and Transfer Pricing Guidelines. It includes a thorough review of international case law on transfer pricing from the United States, Canada, Australia, United Kingdom, Germany, France, the Netherlands, Denmark, Sweden, and Norway. The book ends with an analysis of the issues associated with the application of the arm's length principle for multinational enterprises in a global economy.

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