

Bloomberg Global Tax Guide

Minjie Lin

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The Intellectual Property Holding Company Jeffrey A. Maine, Xuan-Thao Nguyen, 2017-12-07 Many companies that have become household names have avoided billions in taxes by parking their valuable intellectual property IP assets in holding companies located in tax favored jurisdictions In the United States for example many domestic companies have moved their IP to tax favored states such as Delaware or Nevada while multinational companies have done the same by setting up foreign subsidiaries in Ireland Singapore Switzerland and the Netherlands In this illuminating work tax scholar Jeffrey A Maine teams up with IP expert Xuan Thao Nguyen to explain how the use of these IP holding companies has become economically unjustified and socially unacceptable and how numerous calls for change have been made This book should be read by anyone interested in how corporations including Gore Tex Victoria's Secret Sherwin Williams Toys R Us Apple Microsoft and Uber have avoided tax liability with IP holding companies and how different constituencies are working to stop Transfer Pricing Developments Around the World 2022 Michael Lang, Raffaele Petruzzi, 2022-10-11 Intensive work on transfer pricing one of the most relevant and challenging topics in the international tax environment continues to increase worldwide at every level of government and international policy with a far reaching impact on countries legislations administrative guidelines and jurisprudence This book presents an in depth issue by issue analysis of the current state of developments along with suggestions for future solutions to the problems raised Emerging from the research conducted by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU Vienna University of Economics and Business this book offers eight topic based chapters prepared by international experts on transfer pricing Greatly helping to define recent transfer pricing issues around the world this book encompasses the following topics Global Transfer Pricing Developments Transfer Pricing Developments in the European Union Transfer Pricing Developments in the United States Transfer Pricing Developments in Developing Countries and Emerging Economies Recent Developments on Transfer Pricing in the Post Covid 19 Era Recent Developments on Transfer Pricing and Substance Recent Developments on Transfer Pricing and Business Restructurings Recent Developments on Transfer Pricing and New Technologies The intense work of international organizations such as the OECD UN and other international organizations as well as the intense work of the EU is thoroughly analyzed in this book The detailed analysis will be of immeasurable value to the various players including international organizations the business community and advisory firms corporate CEOs and CFOs and government officials as well as to tax lawyers in house counsel and interested academics in facilitating efficient dialog and a coordinated approach to transfer pricing in the future Mergers, Acquisitions, and Other Restructuring Activities Donald DePamphilis, 2021-09-26 Mergers Acquisitions and Other Restructuring Activities An Integrated Approach to Process Tools Cases and Solutions Eleventh Edition presents the most current and comprehensive M A information available Organized according to the context in which topics normally occur in the M A process the book covers M A environments M A processes

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