

Chapter 3: Tax Formula and Tax Determination

Components of the tax formula

Tax liability = taxable income x tax rate

- Income: All income taxable and non-taxable, "any increase in wealth"
- (Exclusions): Items congress has chosen to exclude
- Gross Income: All income unless specifically excluded
- (Deductions for AGI): Above the line of deductions
- AGI: Used to limit itemized deductions
- (Deductions from AGI): Below the line of deductions
- (Itemized/Standard Deductions): Personal expenses Congress allows
- (Charitable Contributions)
- (Personal Dependency Exemption): Suspended until 2025
- (Deduction for Qualified Business Income): Allowed until 2025, 20% of income from non-corporate business
- Taxable Income

Itemized Deductions from the following can only be taxed up to \$10,000 (if more then don't count it)

- State/local income or sales tax
- Real estate taxes
- Personal property taxes

Itemized Deductions can have floor or ceiling limitations

- Floor limitation: amount above the AGI
- Ceiling limitation: amount below the AGI
- **AGI line formula = taxable income x %**

Standard Deduction

- 5 filing statuses outlined in slides
- Income vs Ability to Pay (takes your everyday expenses into account that you need to live)
- Basic standard deduction according to filing status
- Choose the larger of itemized or standard deduction (can select each year)
- Taxpayer who is over 65 or blind qualifies for an additional standard deduction
 - o Applies to qualifying spouse but not a dependent
- Individuals not eligible for standard deduction
 - o If married filing separately and spouse itemizes, you have to itemize
 - o Non-citizens/residents

Chapter Tax Determination Solution

Thomas Noboru Fukushima



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Science, Technology and Taxation Robert F. van Brederode,2012-08-01 This first comprehensive study of the interaction between technology and taxation approaches the subject along four main avenues insight and analysis gained from empirical legal studies conducted in the area of taxation methods for improving the control and management of the tax function in business tax auditing through statistical sampling and changes in the fiscal environment as a result of technological capabilities Among the topics that arise are the following what choices of sampling methodology exist determination of both one sided and two sided confidence intervals under what circumstances statistical sampling is acceptable as proof of underpayment and as a basis for penalties the use of sampling agreements as a tool to improve taxpayers understanding of the process complexities encountered by the introduction of technology in tax administration in developing countries technological capability to detect economic activity in the informal sector technological innovation as substitute for inadequate human capacity improvements available to better monitor the movement and values of goods entering a country safeguards to prevent unauthorized use of personal information prioritizing resources to ensure that the key strategic objectives of the agency are being addressed government defensive action and the threat to privacy and capabilities and limitations of enterprise resource planning systems and tax engines Although the author pays especially detailed attention to the technologies developed and used by the United States Internal Revenue Service other notable systems developed by the European Union Brazil Mexico and China are also examined Various sampling methods and practices are illustrated with numerical examples As tax systems acquire ever higher levels of integration and because accuracy is crucial to the measurement of tax compliance the perspectives opened and expertly analyzed by the author will prove of great importance Practitioners tax policymakers and administrators tax standard setters and tribunals dealing with disputes over tax administration and procedure as well as academics and researchers will instantly recognize the book s great importance and practical value Solutions Manual to Accompany Intermediate Accounting: Chapters 13-22 J. David Spiceland,2004

Double non-taxation and the use of hybrid entities Leopoldo Parada,2023-12-11 The topics of double non taxation and hybrid entities have acquired particular importance in a context where transformations in the tax world have led to

international commitments materialised in the OECD Base Erosion and Profit Shifting BEPS project In what is the first systematic in depth analysis of the OECD BEPS Action Plan 2 and hybrid entities this timely book provides a critical review of the approach adopted by the OECD and proposes a deeply informed alternative method to deal with the problem of hybrid entity mismatches The author analyses the interaction between the double non taxation outcome and the use of hybrid entities in an approach not strictly linked to any specific tax jurisdiction To this end the analysis includes case studies and examples from a range of jurisdictions emphasising the international tax context also including the application of tax treaties Among the seminal matters covered in this edition are the following foundations of the concepts of double non taxation and hybrid entities extensive analysis based on the rules of characterisation of foreign entities for tax purposes in the United States Spain Denmark and Germany as well as on the Poland United States and Canada United States tax treaties in depth analysis of the implications of Article 1 2 OECD Model Tax Convention and Article 3 1 Multilateral Instrument MLI especially considering the position of developing source countries detailed analysis of the OECD BEPS Action 2 and its recommendations linking rules including its implementation in the EU Anti Tax Avoidance Directive ATAD and elaborated alternative method to deal with hybrid entity mismatches reactive coordination rule which is informed by the tax policy aims of simplicity coherence and administrability Detailed comparisons between the author s proposal and other existing rules elucidate common points and deviations If merely for its unparalleled clarification of the issues this book will prove of immeasurable value to practitioners tax authorities policymakers and academics concerned with international tax law Beyond that as an authoritative guide that promises to reorient the discussion to what really matters in the debate regarding hybrid entity mismatches this analysis elaborates solutions applicable to a generality of cases worldwide and therefore hugely promotes the urgent quest for alternative views

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