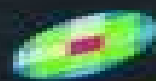


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Standard Federal Tax Reporter Commerce Clearing House, 2008 Includes legislation, U.S. Tax Court, and other court decisions, and U.S. Treasury decisions. **International Taxation of Permanent Establishments** Michael Kobetsky, 2011-09-15 The effects of the growth of multinational enterprises and globalization in the past fifty years have been profound, and many multinational enterprises, such as international banks, now operate around the world through branches known as permanent establishments. The business profits article, Article 7 of the OECD model tax treaty, attributes a multinational enterprise's business profits to a permanent establishment in a host country for tax purposes. Michael Kobetsky analyses the principles for allocating the profits of multinational enterprises to permanent establishments; under this article, explains the shortcomings of the current arm's length principle for attributing business profits to permanent establishments, and considers the alternative method of formulary apportionment for allocating business profits. *U.S. Master Depreciation Guide* CCH Editorial, 2009-12 A one-stop resource for guidance in understanding and applying the complex depreciation rules, this reference explains the three depreciation systems used today: MACRS, ACRS, and ADR. **The CPA Journal**, 2007

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