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U.S. Master State Tax Practice and Procedure Guide CCH State Tax Law Editors, 2007 Towards a Neutral Formulary Apportionment System in Regional Integration Shu-Chien Chen, 2023-03-09 International tax regimes and practices are heavily criticized for failing to fairly levy corporate tax on giant multinational taxpayers in the current globalized and digitalized world This important and far seeing book demonstrates how formulary apportionment FA an approach by which a multinational corporation pays each jurisdiction's corporate tax based on the share of its worldwide income allocated to that jurisdiction can achieve the much sought goal of aligning value creation and taxation The author through an intensive analysis of the European Union s EU s Common Consolidated Corporate Tax Base CCCTB Directive Proposal s and comparison to the United States US s formulary apportionment experience shows how the perceived problems with an FA system can be overcome and lays out the necessary elements for its feasibility With detailed attention to the debates around formulary apportionment and its theoretical foundations the book provides a blueprint for rebuilding the normative framework for the EU s tax reform by clearly analysing the implications of the following and more theorising public benefits to be represented by taxation reorganising different economic theories about tax neutrality and tax justice advancing the comparative legal research methodology to analyse law reform by combining the functional approach and the problem solving approach designing the logical formulary apportionment system for digital economy ensuring the removal of the incentive for multinationals to shift reported income to low tax locations reducing the tax system's complexity and the administrative burden it imposes on firms eliminating transfer pricing complexity for intra firm transactions achieving equal weighting of the sales factor the labour factor and the asset factor in the formula application of destination based rule for attributing the sales factor and replacing the traditional permanent establishment nexus with a factor presence nexus The presentation incorporates extensive comparison between the EU s formulary apportionment tax reform option and FA systems existing in the United States US at state level including reference to relevant US case law and legislation As a possible option to address the problem of base erosion and profit shifting BEPS formulary apportionment is gaining increasing acceptance and attention This book will prove invaluable to taxation authorities tax practitioners and scholars in its deeply informed and systematic guidance on good practices and prevention of problematic experiences in establishing and implementing an effective and market neutral FA system Food Law for Public Health Jennifer L. Pomeranz, 2015-10-20 Food and its many aspects production consumption marketing labeling procurement safety have become a mainstay of both popular discourse and the practice of public health Food Law for Public Health is the first book on food law written specifically for a public health audience It offers necessary grounding in food law for audiences in public health nutrition food studies policy or anyone with a professional interest in this increasingly important area With clear writing and thought provoking questions and exercises for classroom discussion it is an ideal tool for learning and teaching **State Tax**

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