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light of the suggested presumptive benefit principle so as to counteract profit shifting risks and thus attain a more equitable allocation of taxing rights among States This PhD thesis obtained the prestigious European Academic Tax Thesis Award 2018 granted by the European Commission and the European Association of Tax Law Professors What s in this book This book provides a disruptive discourse on tax sovereignty in the field of corporate income taxation that endeavors to escape from long standing tax policy tendencies and prejudices while considering the challenges posed by a globalized and increasingly digitalized economy In particular the book offers an innovative perspective on certain deep rooted paradigms historically underlying corporate income taxation tax treatment of related parties within a corporate group along with the arm's length standard corporate tax residence standards and definition of source for corporate income tax purposes with a particular emphasis on the permanent establishment concept The book explores their respective origins supposed tax policy rationales structural problems and interactions ultimately showing how the way tax jurisdiction is currently defined through them inherently tends to trigger profit shifting outcomes In view of the conclusions of the study the author suggests the use of a new version of the traditional benefit principle the presumptive benefit principle that would contribute to address the profit shifting phenomenon while serving as a practical guideline to achieve a more equitable allocation of taxing rights among jurisdictions Finally the book submits a number of proposals inspired by the aforementioned guideline that aspire to strike a balance between equity effectiveness and technical feasibility They include a new corporate tax residence test and most notably a proposal on a new remote sales permanent establishment How this will help you With its case study based on the Apple group empirically demonstrating the existence of the profit shifting phenomenon its clearly documented exposure of the reasons why traditional corporate income tax regimes systematically give rise to these outcomes its new tax policy guideline and its proposals for reform this book makes a significant contribution to current tax policy discussions concerning corporate income taxation in cross border scenarios It will be warmly welcomed by all concerned policymakers scholars practitioners with the greatest tax policy challenges that corporate income taxation is facing in the contemporary world

What Went Wrong George R. Tyler,2013-07-16 Something has gone seriously wrong with the American economy The American economy has experienced considerable growth in the last 30 years But virtually none of this growth has trickled down to the average American Incomes have been flat since 1985 Inequality has grown and social mobility has dropped dramatically Equally troubling these policies have been devastating to both American productivity and our long term competitiveness Many reasons for these failures have been proposed Globalization Union greed Outsourcing But none of these explanations can address the harsh truth that many countries around the world are dramatically outperforming the U S in delivering broad middle class prosperity And this is despite the fact that these countries are more exposed than America to outsourcing and globalization and have much higher levels of union membership In What Went Wrong George R Tyler a veteran of the World Bank and the Treasury Department takes the reader through an objective and data rich examination of

the American experience over the last 30 years He provides a fascinating comparison between the America and the experience of the family capitalism countries Australia Austria Belgium Denmark France Germany the Netherlands and Sweden Over the last 30 years they have outperformed the U S economy by the only metric that really matters delivering better lives for their citizens The policies adopted by the family capitalist countries aren t socialist or foreign They are the same policies that made the U S economy of the 1950s and 1960s the strongest in the world What Went Wrong describes exactly what went wrong with the American economy how countries around the world have avoided these problems and what we need to do to get back on the right track Mobile Computing and Communications Review ,2008 Index ,2013-06 Indexes the Times Sunday times and magazine Times literary supplement Times educational supplement Time educational supplement Scotland and the Times higher education supplement Mac Life ,2008-09 MacLife is the ultimate magazine about all things Apple It's authoritative ahead of the curve and endlessly entertaining MacLife provides unique content that helps readers use their Macs iPhones iPods and their related hardware and software in every facet of their The Michigan Journal, 2012 The Wall Street Journal ,2009 personal and professional lives Programmers Paul Deitel, Harvey M. Deitel, Abbey Deitel, 2014-12-15 The professional programmer's Deitel guide to iPhone and iPad app development using iOS 8 SwiftTM Xcode 6 and Cocoa Touch This book presents leading edge computing technologies for professional software developers At the heart of the book is the Deitel app driven approach a variant of Deitel's live code approach concepts are presented in the context of complete working iOS apps rather than using code snippets The introduction and app test drives at the beginning of each chapter show one or more sample executions The book s source code is available at www deitel com books iOS8FP1 You ll quickly learn everything you need to start building iOS 8 apps beginning with a test drive of the Tip Calculator app in Chapter 1 then building your first apps in Chapter 2 with visual programming and in Chapter 3 with Swift By the time you reach Chapter 9 you ll be ready to create your own apps for submission to the App Store We ll overview the submission process including uploading your apps deciding whether to sell your apps or offer them for free and marketing them using in app advertising social media Internet public relations and more

Newsweek ,2010 Investors Chronicle ,2009 U.S. News & World Report ,2008 The Washington Post Index ,2008 Class Action Litigation Report ,2010 Vanity Fair ,2016 Foreign Direct Investment in Latin America and the Caribbean 2017 United Nations. Economic Commission for Latin America and the Caribbean,2018-01-15 This publication sets out and analyses the main foreign direct investment FDI trends in the countries of Latin America and the Caribbean The 2017 edition shows that the region is at a difficult juncture FDI inflows declined by 7 9% in 2016 to US 167 043 billion representing a cumulative fall of 17 0% since the peak in 2011 The fall in commodity prices continues to affect investments in natural resources sluggish economic growth in several countries has slowed the flow of market seeking capital and the global backdrop of technological sophistication and expansion of the digital economy has concentrated

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