



Byrd & Chen's
Canadian Tax Principles
Volume 1, Volume 2, and Study Guide

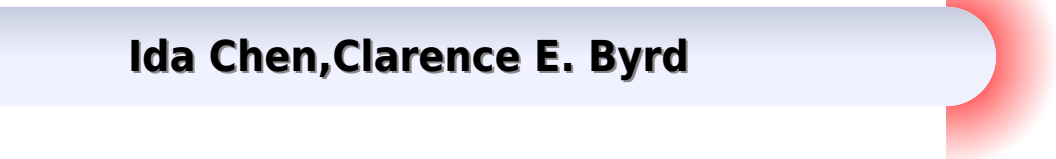
2024–2025 Edition



Gary Donell

Canadian Tax Principles 2015 Study Guide

Ida Chen, Clarence E. Byrd



Canadian Tax Principles 2015 Study Guide:

Byrd and Chen's Canadian Tax Principles, 2012 - 2013 Edition Clarence E. Byrd, Ida Chen, 2012-08-24 Byrd and Chen's Canadian Tax Principles, 2003 -2004 Ida Chen, Clarence E. Byrd, 2003-08-25 This text is appropriate for one or two term courses covering personal and corporate taxation Written in an accessible style this text assumes that the student has no previous education in taxation Byrd Chen s Canadian Tax Principles can be used with or without other source materials this includes the Income Tax Act Information Circulars Interpretation Bulletins and other official materials The Income Tax Act is referenced in the text where appropriate for further independent study Students should be able to solve all of the end of chapter problems by relying solely on the text as a reference The text and problem materials are comprehensive of the syllabus requirements of the CGAs CAs and CMAs **Jurisdiction to Tax Corporate Income Pursuant to the**

Presumptive Benefit Principle Eva Escribano, 2019-05-10 Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle intends to demonstrate that the profit shifting phenomenon i e the ability of companies to book their profits in jurisdictions other than those that host their economic activities is real severe undesirable and above all the natural consequence of both the preservation of three fundamental paradigms that have historically underlain corporate income taxes and their precise legal configuration In view of this the book submits a number of proposals in relation to the aforementioned paradigms and in the 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

Study Guide for Byrd and Chen's Canadian Tax Principles, 2016 - 2017 Edition Clarence Byrd, Ida Chen, 2016-08-29 **Key Ideas in Tax Law** Julian Ghosh KC, 2024-03-21 This book provides a short and clear guide to key ideas which underpin the UK tax code and illustrates the wider political and economic issues students need to know about when studying tax law Some of these key ideas are controversial and the subject of much discussion and debate The book explains the key issues that are of fundamental juristic and philosophical importance and are common to tax codes throughout the world What is a tax Is it different to a civil or criminal penalty Why does this matter Is taxation necessarily a public law concept Does the concept of taxation attract constitutional considerations Why How do the answers to these questions play out when courts have to interpret tax provisions Readers will come away with a clear understanding of the architecture of the UK tax code despite its very real complexity

Study Guide for Canadian Tax Principles, 2019-2020 Edition Clarence Byrd, Ida Chen, 2019-08-15 **Taxation in a Global Digital Economy** Ina Kerschner, Maryte Somare, 2017-10-04 Time to discuss anti BEPS measures around digitalization In the course of the BEPS Report on Action 1 it was concluded that there was no instantaneous need for specific rules to address base erosion and profit shifting BEPS made possible by the digitalization of enterprises and new digital businesses At the same time it was acknowledged that general measures may not suffice with the assessment of results to begin in 2020 While awaiting possible fundamental reforms of the tax framework it is time to discuss anti BEPS measures bearing in mind the peculiar features of the digital economy such as increased mobility no need for physical presence and dematerialization The Book focuses on five key areas of interest International Tax Policy Tax Treaty Law Transfer Pricing Indirect Taxation Issues EU Law Taxation in a Global Digital Economy analyses the issues and addresses the five key areas of interest from various viewpoints

Canadian Almanac & Directory, 2015 Tannys Williams, 2014-10 The Canadian Almanac Directory is the most complete source of Canadian information available cultural professional and financial institutions legislative governmental judicial and educational organizations Canada's authoritative sourcebook for all

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