



Die Anwendungsvoraussetzung Gruppenbesteuerung

Christoph Urtz

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Kernfragen des Unternehmenssteuerrechts Wolfgang Schön, Christine Osterloh-Konrad, 2010-06-27 Die inneren Konflikte der Ertragsbesteuerung finden im Unternehmenssteuerrecht ihren deutlichsten Ausdruck das Spannungsverhältnis zwischen dem subjektiven Einkommen des Individuums und der objektiven Ertragskraft des Betriebes der Widerspruch zwischen der zivilrechtlichen Trennung von Rechtssphären und der wirtschaftlichen Realität der Konzerne die Bruchstellen im traditionellen Gefüge der Einkunftsarten Im Jahre 2009 haben führende Vertreter der deutschen Steuerwissenschaft auf Einladung des Max Planck Instituts für Geistiges Eigentum Wettbewerbs und Steuerrecht in einer Vortragsreihe grundlegende Themen des Unternehmenssteuerrechts präsentiert ihre Beiträge sind in diesem Band zusammenfasst Sie behandeln sowohl Fragen der Rechtsformneutralität der Ausgestaltung der Konzernbesteuerung und der unterschiedlichen Besteuerung von Kapital und Arbeit als auch die Kompatibilität der gegenwärtigen Unternehmensbesteuerung mit Grundprinzipien der Steuerordnung und ihre internationale Wettbewerbsfähigkeit Die Anwendungsvoraussetzung der Gruppenbesteuerung Christoph Urtz, 2012

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