Federal Income Tax

Sixth Edition

Joseph Bankman

Thomas D. Griffith

Katherine Pratt





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principles that define the contours within which the Member States can manoeuvre when considering EU compatible approaches to the credit method To this end among others this book offers an extensive study of the historical legal developments of the credit method an overview of the key design features of the credit method considering the optional variable components such as the credit limitation maximum creditable amount that tailor it to different legal and policy considerations an analysis of the legal constraints on the key features of the credit method flowing from CIEU case law on the fundamental freedoms considering the impact of landmark cases and concepts e.g. Schumacker neutralization the EU law implications based on the type of credit method direct indirect imputation and the feature of the credit method e g credit limitation credit carryforward and examples to clearly and concisely illustrate the basic operation of the credit method and some of the main calculation and EU law issues The author's doctoral dissertation on which the book is based was awarded the Wolfgang Gassner Science Prize 2020 and the European Doctoral Tax Thesis Award 2020 As a timely comprehensive and practical study of the relationship between the credit method and EU law this book will be welcomed by lawyers and other professionals working with taxation matters as well as by tax policymakers and academics in the fields of international and **ABA Journal**, 1958-12 The ABA Journal serves the legal profession Qualified recipients are lawyers European tax law and judges law students law librarians and associate members of the American Bar Association Federal Income Taxation of Corporations Richard L. Doernberg, 1994 Announcing the long awaited revision of noted tax expert Bill Andrews corporate tax casebook New co author Alan Feld joins Professor Andrews in meticulously updating FEDERAL INCOME TAXATION OF CORPORATE TRANSACTIONS to reflect the latest statutory changes through 1993 As well as new cases and developments in corporate tax The Third Edition features more international cases such as Gulf Oil Corp v Commissioner affording more opportunities to explore complex transactions numerous new cases selected for currency and pedagogy discussion of leveraged buyouts and related trends of the 1980s put into perspective thorough treatment of the important new rate advantage for long term capital gains especially with regard to discussion of redemption transactions This new edition maintains the overall organization of previous editions The authors begin with a general introduction that deals with early stock dividend cases And The repeal of the General Utilities doctrine They then consider reorganization and related non recognized provisions before examining distributions to shareholders and corporate taxable income This very effective approach immerses students early in the interplay of complex transactions statutes and unpredictable interpretations introduces court made doctrines in their original setting and gives students a realistic context for studying corporate tax concepts For skillful analysis of corporate tax policy adopt FEDERAL INCOME TAXATION OF CORPORATE TRANSACTIONS Third Edition Its insightful Teacher's Manual completes a truly outstanding teaching package **Federal Income Taxation** of Corporations and Shareholders Boris I. Bittker,1995 U S federal income taxation of corporations and shareholders with reference to case law Focuses on complete corporate transactions and provides interrelated documents dealing with the

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