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Andrea Musselli,2022-09-15T00:00:00+02:00 The book pays attention to the tax treatment of transfer pricing in a single perspective of analysis since the most important principles the arm s length ALP i e conditions that independent parties would share and the sale country are agreed worldwide They must be applied in the same way regardless of the economic sector or industry A country survey overlooks the most important issue of the fiscal problem that is the ability to project a unitary policy in compliance with the ALP or with the sale country principle and that should be audited by one sole only theoretically existing tax authority The practical part and examples disclose how rules should be have been applied how legal proceedings can arise arose regarding their application how they were decided if litigation truly occurred and finally the author s motivated opinion with special focus on which is the breaking point of a specific analysis The term breaking point is used to explain which can be the factual and or the interpretative change that is able to modify such analysis and thus the solution Extract from the preface of prof Reuven Avi Yonah this book is a must read for any serious student of the topic and an important contribution to understanding how the ALP is applied today as well as to how it should be applied It is an invaluable contribution and should be read widely by both tax lawyers and accountants and by tax policy makers Practice Set for West Federal Taxation 2006 Hoffman/Raabe/Smith/Maloney,2005-05 These practice sets by Donald R Trippeer Colorado State University Pueblo are comprehensive and designed to be completed after the related materials have been covered Complete with tax forms and instructions they provide a realistic and challenging experience to accompany the text Solutions are available to instructors only *Goode and McKendrick on Commercial Law* Roy Goode,Ewan

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