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Restatement and Analysis of Current FASB Standards

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between allowing capital markets to function effectively by removing artificial tax barriers and at the same time protecting their countries tax base from tax avoidance schemes that utilise these instruments Derivatives exist in a vast variety and complexity and new forms or combinations of existing forms appear ad hoc as new risk categories emerge and companies seek to invest in or hedge these risks This very thorough book discusses and analyses taxation issues posed by derivatives used in domestic as well as in cross border transactions. In great detail the author presents approaches that can be adopted by tax legislators to solve these problems clarifying her solutions with specific reference to components of the two most important domestic tax systems in relation to derivatives in Europe those of the United Kingdom and Germany Examples of derivatives transactions and arbitrage schemes greatly elucidate the nature of derivatives and how they can be effectively taxed The following aspects of the subject and more are covered basic economic concepts in the context of derivatives such as replication put call parity hedging and leverage designing a suitable definition of derivatives in domestic tax law achieving coherence in domestic tax rules by applying a special regime approach versus an integrative approach and the distinction of income and capital equity and debt alignment of accounting standards and taxation rules and the application of fair value accounting for tax purposes how to tax hedged positions and post tax hedging schemes taxation of structured financial products and hybrid instruments with focus on bifurcation and integration approaches and the recent BEPS discussion drafts on hybrid mismatch arrangements refining the beneficial ownership concept in domestic law and in tax treaties and an analysis of recent case law withholding taxes in the context of domestic and cross border dividend tax arbitrage schemes and tackling derivatives tax arbitrage effectively in anti avoidance legislation By providing an in depth analysis of corporate taxation issues that arise in domestic as well as in cross border derivatives transactions this book is not only timely but of lasting value in the day to day work of tax lawyers and tax professionals in companies banks and funds and is sure to be of interest to government officials academics and researchers involved with financial instruments taxation 2005 Miller Gaap Guide Judith Weiss, Jane Williams, 2004-10 This innovative manual was formally known as the Miller GAAP Practice Manual It picks up where other accounting reference libraries fall dangerously short You ll benefit from the clear concise easy to follow Miller format including FASB Technical Bulletins AICPA AcSEC Practice Bulletins FASB Implementation Guides AICPA Statements of Position and AICPA Accounting Interpretations Plus readers receive analysis and explanation of all current issues on which the EITF reached a consensus since its inception in 1984 A few of the many pronouncements covered in the 2005 Miller GAAP Guide Volume 2 include Organized by subject to make the information immediately accessible the 2004 Miller GAAP Practice Manual has been thoroughly updated to include recent GAAP Level B C and D pronouncements Best selling widely respected guides provide credibility and established authority Fully updated for 2005 Logically structured and clearly indexed for ease of use Miller Governmental Gaap Practice Manual Larry P. Bailey, 2003-11-01 This manual shows financial professionals who work with state and local governments how to apply GASB

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