1. Record Nr. UNINA9910254892203321 Autore Lessambo Felix I Titolo International Aspects of the US Taxation System / / by Felix I. Lessambo Pubbl/distr/stampa New York:,: Palgrave Macmillan US:,: Imprint: Palgrave Macmillan,, 2016 **ISBN** 1-349-94935-3 Edizione [1st ed. 2016.] 1 online resource (389 p.) Descrizione fisica 332 Disciplina Finance, Public Soggetti Tax accounting Tax laws **Public Finance Business Taxation/Tax Law** Lingua di pubblicazione Inglese **Formato** Materiale a stampa Livello bibliografico Monografia Description based upon print version of record. Note generali Nota di bibliografia Includes bibliographical references and index. Nota di contenuto 1 Overview -- 2 The Underlying Principles of the US Tax System -- 3 US Inbound taxation -- 4 The Split of Tax Jurisdiction: The Source Rules --5 The US Taxing Regime of Foreign Taxpayers -- 6 The Branch Profits Tax -- 7 Foreign Investment in Real Property Transaction Act -- 8 The Taxation of Foreign Sovereign in the United States -- 9 The International Tax Treaty Rules -- 10 Foreign Account Tax Compliance Act -- 11 Taxation Regime of Expatriates and Corporate Inversion --12 The Investments of US Individuals or Corporations Abroad -- 13 The US Foreign Tax Credit Regime -- 14 The Subpart F Regime -- 15 Taxation of Derivatives -- 16 The Taxation of Foreign Currency -- 17 Domestic International Sales Corporation -- 18 International Outbound Transactions -- 19 Cross-Border Tax Arbitrage -- 20 Base Erosion and Profit Shifting. This book covers a broad range of the most challenging topics in US Sommario/riassunto international taxation laws before breaking into separate discussions of the issues related to both inbound and outbound taxes. Real examples

and selected seminal cases are analysed at the end of each chapter to

simplify even the most abstract tax provisions. Practitioners.

academics, and advanced students specializing in specific areas of international finance will welcome this comprehensive overview of the US tax system's international laws.