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**F Rizvi**



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The author offers insightful perspectives on such crucial issues as the following corporate group members versus corporate groups as taxable entities anti abuse rules and developments in judicial anti abuse doctrines costs associated with e g valuation of assets compliance and administration how certain core CIT concepts are independent of tax law efficiency equity and the protection of existing property rights the firm s reaction to behavioral control instruments limitations on the use of losses depreciation and amortization rules manipulation of legal characterization and transfer of assets and income The work has an interdisciplinary approach drawing on the literatures of tax law economics corporate law accounting and business management It concludes with a set of policy guidelines that should be considered when approaching the traditionally cumbersome interaction between tax systems and corporate groups Especially valuable to the practitioner are the book s extensive graphic design solutions illustrating the subtleties of the operation of corporate tax laws Analyzing the taxation of corporate groups in a user friendly form not available in any other source this book greatly enhances the development of advanced tax planning methods that do not disrupt the economic operation of businesses Its comprehensive conceptual framework will greatly facilitate the work of those from practitioners to researchers interested in developing a practical approach to corporate income taxation applicable at a global level

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