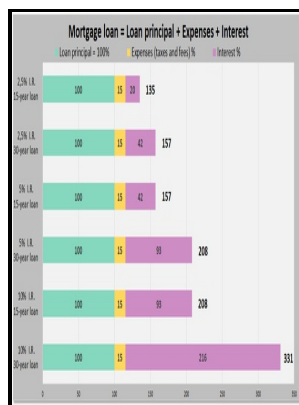


Are international deposits tax-driven?

European Commission, Directorate-General for Economic and Financial Affairs - Corporate Tax Competition and Coordination in the European Union: What do we know? Where do we stand?



Description: -

-Are international deposits tax-driven?

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Notes: Includes bibliographical references.

This edition was published in 2001



Filesize: 33.107 MB

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E

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Internal Revenue Bulletin: 2021

Journal of Urban Economics, 38: 333-356. The preamble requested comments on whether 25 percent was the right threshold, whether different rules should apply to general partnerships and limited partnerships, and whether a material participation test should apply.

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Accordingly, the final regulations provide that a publicly traded corporation, which is defined as a corporation that has been publicly traded in more than de minimis amounts for at least twenty trading days approximately one month during a taxable year, is required to apply the Asset Test based on value.

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