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Lauren Gardner



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The Entrepreneurial State Mariana Mazzucato,2024-02-06 Award winning economist Mariana Mazzucato s famously incisive international bestseller debunking the pervasive myth of the inept state versus an innovative private sector with a new preface by the author According to conventional wisdom innovation is best left to the bold entrepreneurs of the private sector and government should get out of the way But what if that wasn t case What if from the inventions of Silicon Valley to medical breakthroughs the public sector has actually been the most courageous and valuable risk taker of all Critically acclaimed and influential thinker and scholar Mariana Mazzucato argues comprehensively against the myth of a lumbering bureaucratic state versus a dynamic innovative private sector with remarkable original and deep research In a series of case studies from nanotechnology to the emerging green tech of today Mazzucato reveals that the opposite is true the private sector only finds the courage to invest after an entrepreneurial state has made the high risk investments The Entrepreneurial State reveals how every technology that makes the iPhone so smart was actually funded by the government from the Internet and GPS technology to touch screen displays and voice activated Siri In the history of modern capitalism the State has not only fixed market failures but has also actively shaped and created markets In doing so it sometimes wins and sometimes fails Yet by not admitting the State s role in active risk taking we ve created an innovation system where the public sector socializes risks while privatizing reward as Mazzucato controversially argues This bold and provocative book considers how we adopted this dysfunctional dynamic and then how we can overcome it so that economic growth can be not only smart but inclusive as well

Cases Decided in the Court of Claims of the United States United States. Court of Claims,1940

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The Intellectual Property Holding Company Jeffrey A. Maine,Xuan-Thao Nguyen,2017-12-07 Many companies that have become household names have avoided billions in taxes by parking their valuable intellectual property assets in holding companies located in tax favored jurisdictions In the United States for example many domestic companies have moved their IP to tax favored states such as Delaware or Nevada while multinational companies have done the same by setting up foreign subsidiaries in Ireland Singapore Switzerland and the Netherlands In this illuminating work tax scholar Jeffrey A Maine teams up with IP expert Xuan Thao Nguyen to explain how the use of these IP holding companies has become economically unjustified and socially unacceptable and how numerous calls for change have been made This book should be read by anyone interested in how corporations including Gore Tex Victoria s Secret Sherwin Williams Toys R Us Apple Microsoft and Uber have avoided tax

liability with IP holding companies and how different constituencies are working to stop them Tax Information for Survivors, Executors, and Administrators United States. Internal Revenue Service, 1988 Treasury Decisions Under Internal Revenue Laws of the United States United States. Internal Revenue Service, 1937 **Diminishing Returns** Lucio Baccaro, Mark Blyth, Jonas Pontusson, 2022 A set of state of the art empirical analyses at the country regional and global level that work from a new theoretical framework that analyzes the politics of growth and stagnation As highlighted by the recent debate on secular stagnation economic growth has slowed down considerably and this has given rise to a host of new problems from financial instability to the collapse of mainstream parties What happens when growth the main mechanism of capitalist legitimation is harder to come by and less broadly shared And how should we think about capitalist diversity in the context of global stagnation In **Diminishing Returns** Lucio Baccaro Mark Blyth and Jonas Pontusson address these questions by bringing together a number of comparative and international political economists with expertise across many different countries and regions Going beyond the methodological nationalism common in most comparative research each author departs from a common theoretical framework the Growth Model Perspective and contributes to develop it further The outcome is a new theoretical framework to help social scientists policymakers and opinion makers understand the politics of growth and stagnation which offers state of the art empirical analyses at the country regional and global level **Treasury Decisions Under Internal Revenue Laws of the United States** United States. Office of Commissioner of Internal Revenue, 1937 IRS Practice & Policy , 1990 **Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle** Eva Escribano, 2019-05-10 Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle intends to demonstrate that the profit shifting phenomenon i e the ability of companies to book their profits in jurisdictions other than those that host their economic activities is real severe undesirable and above all the natural consequence of both the preservation of three fundamental paradigms that have historically underlain corporate income taxes and their precise legal configuration In view of this the book submits a number of proposals in relation to the aforementioned paradigms and in the light of the suggested presumptive benefit principle so as to counteract profit shifting risks and thus attain a more equitable allocation of taxing rights among States This PhD thesis obtained the prestigious European Academic Tax Thesis Award 2018 granted by the European Commission and the European Association of Tax Law Professors What s in this book This book provides a disruptive discourse on tax sovereignty in the field of corporate income taxation that endeavors to escape from long standing tax policy tendencies and prejudices while considering the challenges posed by a globalized and increasingly digitalized economy In particular the book offers an innovative perspective on certain deep rooted paradigms historically underlying corporate income taxation tax treatment of related parties within a corporate group along with the arm s length standard corporate tax residence standards and definition of source for corporate income tax purposes with a particular emphasis on the permanent establishment concept The book explores their respective origins

supposed tax policy rationales structural problems and interactions ultimately showing how the way tax jurisdiction is currently defined through them inherently tends to trigger profit shifting outcomes In view of the conclusions of the study the author suggests the use of a new version of the traditional benefit principle the presumptive benefit principle that would contribute to address the profit shifting phenomenon while serving as a practical guideline to achieve a more equitable allocation of taxing rights among jurisdictions Finally the book submits a number of proposals inspired by the aforementioned guideline that aspire to strike a balance between equity effectiveness and technical feasibility They include a new corporate tax residence test and most notably a proposal on a new remote sales permanent establishment How this will help you With its case study based on the Apple group empirically demonstrating the existence of the profit shifting phenomenon its clearly documented exposure of the reasons why traditional corporate income tax regimes systematically give rise to these outcomes its new tax policy guideline and its proposals for reform this book makes a significant contribution to current tax policy discussions concerning corporate income taxation in cross border scenarios It will be warmly welcomed by all concerned policymakers scholars practitioners with the greatest tax policy challenges that corporate income taxation is facing in the contemporary world

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