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Discusses two fundamental principles of US taxation of international transactions, i.e. tax jurisdiction and the source of income rules. Explains how the US taxes the foreign activities of domestic corporations, US citizens and other US persons. Includes chapters on the foreign tax credit, the deemed paid foreign tax credit, transfer pricing, controlled foreign corporations, foreign sales corporations and income tax treaties. Describes how the US taxes the US activities of foreign corporations, non-resident alien individuals, and other foreign persons.

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The Practical Guide to the United States Constitution offers an accurate but entertaining look at the founding documents. It covers the how's, what's, and why's of the United States Constitution, but with a side of fun. The mission is simple: to make the Constitution so easy to understand that even a career politician can grasp it. This Practical Guide covers the underlying concepts of natural rights and consent-based government. Hint: it's not to subpoena and investigate each other. The book also clarifies how each of the three primary founding documents, the Declaration of Independence, the Constitution, and the Bill of Rights, work together to define the goals, theory, and mechanics of the American system. The heart of this constitutional owners' manual is a simplified walk through the contents and meaning of the founding documents. If you've ever wanted to know what the Constitution really says, this book is for you. Reader feedback: Just finished reading The Practical Guide to The United States Constitution, I wish I could have read this 40 years ago, better yet in government class in high school, 1966. I retired 6 years ago and finally had the time to get educated in the political process and history of this great country. I had to move my

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library book down to place this one in the top 3 "BEST". This book needs to be in every high school government class as "required" reading to graduate. It's fantastic, factual, easy to read, well organized, and spellbinding. Any time a person can read, have fun and learn something new it's a good deal! Buy this book now! Tom McHale has managed to keep me reading, in short sessions, for the past week until I finished his delightful, lighthearted explanation of the founding documents of our republic. No heavy tome for law school students, 'The Practical Guide to the United States Constitution is an engaging, fun read... in a civics primer, no less! Well done, Mr. McHale. I enjoyed this guide of the Constitution. It was easy to read, witty, and gave everyday explanations. While interpretation may be one thing... the actual words are quite simple. Tom did a nice job... I highly recommend this book for for first time diving into the Constitution.

Through a practical introduction to the policies of the American welfare state—a wide-ranging subject much discussed but seldom described—this concise volume details the four main areas of social welfare policy: housing assistance, nutrition assistance, income assistance, and medical assistance. In plain, approachable language, author Brian J. Glenn explains, for example, how Section 8 housing vouchers function, what the Supplemental Nutrition Assistance Program is, how Medicare has developed, and what Temporary Aid for Needy Families does. Especially in the era of Covid-19 and a recession, there is a need for citizens and students to understand the American social safety net. The American Welfare State is written in a manner that allows a complete novice to understand these programs in a brisk and comprehensive fashion that is both short enough to read over a couple of nights in a course and yet detailed enough for the programs to be understood at quite a nuanced level. In this thoroughly updated second edition, author Brian J. Glenn outlines the ways in which social welfare programs differ, sometimes dramatically, from locality to locality. To help students understand how these policies function, Glenn looks at the support households receive in five cities: Boston, Houston, Kansas City, Los Angeles, and New Orleans. This approach provides not only a geographic spread but also an examination of the variability of support, giving the reader a feel for the range of funding levels and also the variety of ways programs can be implemented. In short, this book is a fully updated and handy teaching and learning tool that fills a huge gap in the literature on a subject that many want to teach but often lack the resources to do.

Provides thorough analysis of the US tax laws on international transactions by persons subject to US tax

Moving to the United States can be an exciting prospect filled with possibilities, but it can also be an overwhelming task weighed down with confusing red tape, logistics, and paperwork. Not to mention the challenges of navigating a different culture and social system once you arrive. It's hard to know where to begin. The good news is, whether you're still in the preparation phase, or you've already relocated, this guide is your new best friend! An immigration attorney and a certified public accountant have teamed up to provide the most commonly needed information based on their extensive work with families and businesses relocating to the United States. Having answered thousands of questions about immigration law, taxation, and general life, their guide serves the actual needs of real people. And you don't have to start on page one. Simply scan the table of contents or index to find the relevant keyword or topic, and flip to the corresponding page to get your answers right away. Their straightforward, easy-to-understand explanations are designed to help you navigate US systems and culture, so you can make the best decisions possible for you and your loved ones. Get started on your new American life today!

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U.S. real estate is enormously attractive to many foreign investors, who are thus ushered into the ambit of the complex U.S. Foreign Investment in Real Property Tax Act (FIRPTA). A full understanding of the associated tax implications on the part of these investors and their advisors is essential if they are to implement the correct structure to maximize their returns, avoid unnecessary withholding, and comply with applicable requirements. This book, the first practical guide to FIRPTA, clearly articulates the operation and transactional implications of FIRPTA and its interaction with various other regimes, sets forth real life situations, and points out potential traps, all in a readily graspable format. Among the tax issues and consequences that directly or indirectly affect foreign investors in U.S. real property interests, the author highlights the following and more: • the real estate investment trust (REIT); • withholding taxes that are jointly and severally liable for buyers and sellers; • treatment of rental, interest, and dividend income; • effect of the branch profits tax; • tax treaty benefits; • exemptions to FIRPTA; • special rules applicable to foreign governmental investors; • tax reporting standards and potential penalties for noncompliance; and • state and local tax issues relating to U.S. real estate investments. Providing a straightforward and accessible guide for navigating the tax issues that confront foreign investors in U.S. real estate, this resource will prove invaluable in identifying and formulating the correct strategies for investors and their advisors with respect to investments in the U.S. real estate market. It is sure to benefit all interested parties for years to come. Angela W. Yu, a tax partner of KPMG's New York office, has extensive experience providing integrated tax advice to clients on cross-border transactions. She is a frequent speaker on U.S. tax issues, and has addressed many professional organizations.

At last a guide to fish as well as invertebrates with profusely illustrated keys and the most recent terminology! It is not only practical but authoritative as well. A Practical Guide to the Marine Animals of Northeastern North America features Leland Pollock's innovative, user-friendly keys that circumvent many of the difficulties of traditional identification systems. Pollock's keys offer choices among distinctive attributes of the specimen. Results are compared to all variations found in the region's fauna, using a neatly displayed tabular form accompanied by many line drawings.

Practical Guide to C Corporations offer practitioners current and practical explanation and analysis on corporations, giving them the guidance needed to manage the C Corporation election, compliance, tax planning, and life cycle needs. In addition to thorough coverage of how the tax laws impact C corporations, the Practical Guide details corporate formation, distributions, redemptions, liquidations, reorganizaitons and issues related to corporate tax practice and procedure. Practical Guide to C Corporations provides business entity practitioners with complete coverage of C corporation taxation issues.

In an increasingly global world, capital raising, securities trading and mergers and acquisitions often involve some connection with the United States and implicate the U.S. securities laws. United States Securities Law: A Practical Guide, offers a concise overview of the law and practice of issuing securities, listings, takeovers and the securities markets in the United States from the perspective of a non-U.S. participant. Originally published in 1992, this new edition has been significantly expanded and updated. The book is intended primarily for managers, financial intermediaries, lawyers and others seeking an overview of the topic. It offers a combination of practical insight and precise analysis.

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