

Tax Accounting in Mergers and Acquisitions

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Book Tax Accounting Mergers Acquisitions 2016

Glenn R. Carrington

Book Tax Accounting Mergers Acquisitions 2016:

Tax Accounting in Mergers and Acquisitions 2016 Glenn R. Carrington, 2015-11-05 There are many considerations that influence how a transaction is structured including tax considerations. The most basic tax issue is whether to structure the transaction as taxable or tax free In general there are four basic structures for a corporate acquisition 1 a taxable acquisition of a target corporations assets 3 a tax free acquisition of the target corporations stock or 4 a tax free acquisition of a target corporations assets. While at first blush it may seem that it is always more desirable to structure a transaction as tax free this is not always the case As an initial matter the requirements for structuring a transaction as a tax free reorganization which are set forth in 368 are quite strict. The strictures imposed by 368 may not always be compatible with the business objectives of the parties to the transactions making resort to a taxable structure more desirable. If the fair market value of a target corporations assets is greater than the targets basis in such assets the purchaser may wish to acquire a fair market value basis i e a stepped up basis in such assets something that is only possible in a taxable asset acquisition or a taxable stock acquisition for which a 338 election is made Tax Accounting in Mergers and Acquisitions gives in depth practical coverage of today s key issues in corporate acquisitions dispositions reorganizations and restructurings from a transactional perspective. It will help your client 1 Decide if the transaction should be taxable or nontaxable 2 Structure the deal for the best results stock or asset acquisition 3 Achieve desired business objectives. This book considers the tax accounting implications of structuring and restructuring transactions incl

Mergers, Acquisitions, and Buyouts, March 2016: Five-Volume Print Set GINSBURG, Donald E. Rocap, 2016-03-07 When structuring mergers and acquisitions there s only one way to be sure that you ve thought of all the tax and legal consequences rely on Martin D Ginsburg Jack S Levin and Donald E Rocap as you plan develop and execute your Mand A strategy In this five volume print set these expert practitioners offer you Solutions to real life Mand A problems as they arise in negotiations Step by step analysis of typical and non typical mergers transactional permutations Checklists flow charts and other at a glance mergers practice materials Whether you represent the buyer the seller or another interested party you can go straight to a model Mand A agreement that gives you A complete document structured to embody your client s Mand A interests Clauses addressing a wide variety of specific mergers situations Specific language for even the smallest mergers and acquisitions variations you re likely to encounter Includes CD ROM containing Mergers Acquisitions and Buyouts Sample Acquisition Agreements Mergers Acquisitions and Buyouts is recently updated with New step by step methods for structuring transactions with tax SEC corporate HSR accounting and other mergers considerations New table summarizing and contrasting terms of pro buyer pro seller and neutral stock and asset purchase agreements New mergers legislation Mand A regulations rulings and court decisions impacting Mand A transactions

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2016 complements our existing publication EY s New UK GAAP 2015 and provides a comprehensive guide to the changes made to the new UK accounting standards since August 2014 particularly The amendments to FRSs 100 101 and 102 published in July 2015 which include the ability to use IFRS style primary financial statements The new accounting regime for Small Entities using FRS 102 and FRS 104 Interim Financial Reporting New UK GAAP 2015 and the New UK GAAP Supplement 2016 are an essential tool for anyone applying interpreting regulating studying or teaching the new accounting standards Written by financial reporting professionals from the Financial Reporting Group of EY this book provides a clear explanation of the recent changes to the new accounting standards most of which are mandatory for periods beginning on or after 1 January 2016 as well as the new requirements for Small Entities and those preparing interim financial statements and will prove invaluable in implementing these new requirements It also addresses the related UK Companies Act and relevant statutory instrument changes as well as providing practical worked examples Also available is International GAAP 2016 a three volume comprehensive guide to interpreting and implementing IFRS setting IFRS in a relevant business context and providing insights into how complex practical issues should be resolved in the real world of global financial reporting

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Financial Management and Global Business Environment The Report: Egypt 2016 Oxford Business Group, 2016-01-13 The country's economic strengths include its large domestic market diversified economic base favourable trade relations with major partners such as the EU and geographic location As Egypt continues to rebuild its economy it faces a number of risks External challenges include regional unrest and a slowdown in exports due to muted global growth although the nation s limited exposure to Asian markets lends it some degree of protection The possibility of unrest also features in the domestic risk matrix and security remains a national concern Nevertheless Egypt's economy has continued to expand with the IMF forecasting GDP growth of roughly 4% for 2015 and 4 4% for 2016 **International Taxation of Manufacturing and Distribution** John Abrahamson, 2016-02-18 The most thorough treatment of its subject available this book introduces and analyses the international tax issues relating to international manufacturing and distribution activities extending from the tax regime in the country where the manufacturing activities are located through to regional purchase and sales companies to the taxation of local country sales companies The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends Among the topics and issues analysed in depth are the following foreign tax credits taxation in the digital economy tax incentives intellectual property group treasury companies mergers and acquisitions leasing derivatives controlled foreign corporation provisions VAT and customs tariffs free trade agreements and customs unions transfer pricing role of tax treaties hedging related accounting issues deferred tax assets and liabilities tax risk management supply chain management depreciation allowances and carry forward tax losses The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples Detailed up to date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting BEPS and other measures against tax avoidance As a full scale commentary and analysis of international taxation issues for multinational manufacturing groups including in depth consideration of corporate structures tax treaties transfer pricing and current developments this book is without peer It will prove of inestimable value to all accountants lawyers economists financial managers and government officials working in international trade environments

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