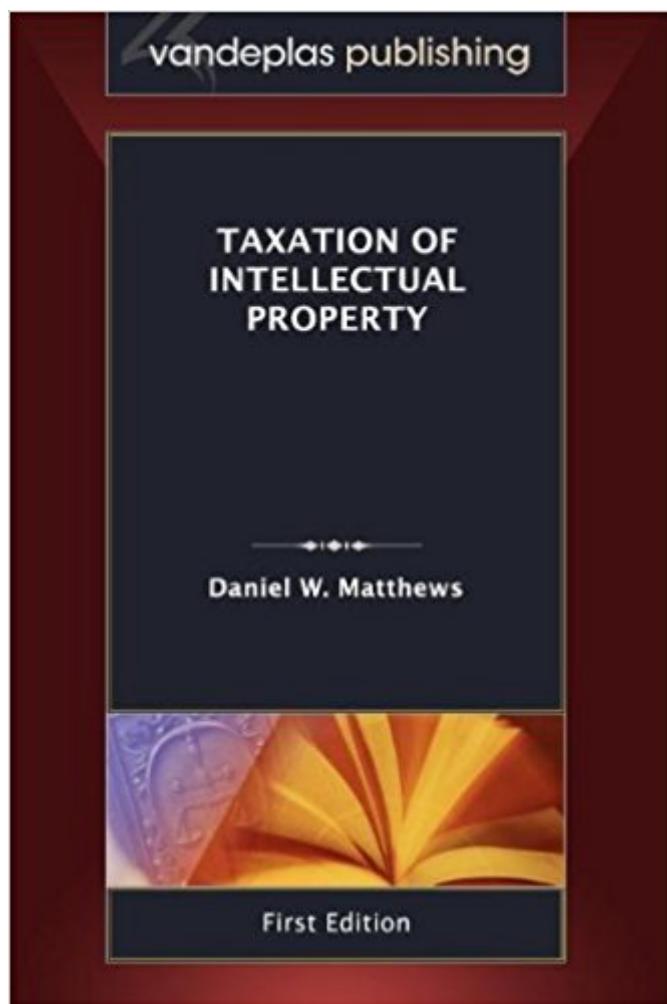


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# Taxation Of Intellectual Property, First Edition 2011



## Synopsis

This book builds upon the "core concepts" introduced in a basic income tax course, such as capitalization, depreciation/amortization, and characterization of income/loss, by specifically addressing their application to intellectual property ("IP"). In some cases, special rules apply the "core concepts" differently to IP. This book's goal is to discuss these special IP tax rules and the policy concerns underlying them. Additionally, this book goes beyond the "core concepts" and addresses tax issues truly unique to IP, such as IP holding companies and international IP transactions. Specifically, this book discusses how multistate corporations use intangible holding companies to minimize exposure to state corporate income taxes. The final chapter covers how U.S. multinationals use IP in international transactions to minimize exposure to U.S. income tax. About the author: Daniel W. Matthews is an Associate Professor at the Thomas M. Cooley Law School. Prior to joining Cooley in 2003, Professor Matthews practiced at a prominent Michigan law firm and served as a tax consultant at Deloitte & Touche. Professor Matthews earned an LL.M degree in Taxation from New York University and was awarded a Juris Doctor, summa cum laude, from Michigan State University College of Law.

## Book Information

Hardcover: 564 pages

Publisher: Vandeplas Publishing (November 22, 2011)

Language: English

ISBN-10: 1600421563

ISBN-13: 978-1600421563

Product Dimensions: 7 x 1.2 x 10 inches

Shipping Weight: 2.2 pounds

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Best Sellers Rank: #1,656,710 in Books (See Top 100 in Books) #91 in Books > Business & Money > Taxation > Corporate #1010 in Books > Law > Intellectual Property #1439 in Books > Law > Tax Law

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