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CENTRAL BOARD OF DIRECT TAXES

Cbdt Study Guide

**Connie M. Weaver, Heike Bischoff-
Ferrari, Robin M. Daly, Man-Sau Wong**

Cbdt Study Guide:

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Trafficking Across the Vietnam-Laos Border Hai Thanh Luong, 2019-05-06 This book presents the first detailed inquiry into the nature of cross border drug trafficking between Laos People's Democratic Republic and Vietnam using an exploratory approach. It draws upon qualitative and quantitative methods case studies interviews and survey data from criminal investigation police and drug related crimes officers CIPDRC from six border provinces which are directly and indirectly involved in investigating these cross border cases. The author demonstrates that drug markets in Vietnam are not controlled by monopolistic hierarchical organizations or cartels but small structures based on family ties and fellow countrymen relations which are fluid and loosely organized. They are very adaptable and sophisticated with diverse modus operandi and multiple divisions of labour which present particular challenges to law enforcement agencies which the author discusses

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Wilson, 2016-04-24 With the ongoing expansion of outbound foreign direct investment FDI in the countries representing the BRICS economic bloc Brazil Russia India China and South Africa and with all of them at the same time listed among the top seven countries plagued by tax evasion and avoidance in the guise of illicit outflows the five governments both individually and through cooperative initiatives have devised new international tax strategies that are proving to be of great interest and value to other countries both developing and developed. The core of these strategies addresses the necessity of stemming the outflow of revenue while strongly supporting FDI both inbound and outbound while complying with international obligations including those arising from human rights laws. This book is the first in depth commentary on this new and evolving area of international tax law. The detailed analysis covers the entire field of BRICS international tax law considering topics such as the following information exchange procedures and pitfalls response to the OECD's Base Erosion and Profit Sharing BEPS initiative role of bilateral and multilateral double taxation conventions including the Multilateral Instrument and the Bilateral Investment Treaties thin capitalization transfer pricing controlled foreign corporation rules shortcomings related to authorities limited manpower international audit and investigation procedures the BRICS approach to residence and mandatory and binding arbitration and the BRICS approach to shaping the developing world's international tax system. Notably the author personally conducted interviews with senior international representatives of the BRICS tax authorities as well as with leading BRICS academics and practitioners. Tax cases together with human rights and investment cases and administrative guidelines in all five countries are also included in the analysis. The study concludes with recommendations for improving each of the five countries tax law and procedures especially in the area of dispute resolution. The author's goal is to extend the existing body of knowledge of the BRICS international tax laws in order to assist in developing an understanding of the BRICS approach to dealing with evasion and avoidance an approach which facilitates both outbound and inbound FDI simplifies tax authority administration and establishes a basis for resolving international disputes which is compatible with sovereignty. In achieving this objective the author has produced a major work that is of immeasurable value to tax advisers.

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