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CORPORATE TAXATION

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Abstract

Much of the traditional economic literature has until relatively recently ignored almost all of the details of the coverage of the tax and the legal institutions within which the tax has developed. As a result, most of the rules used in establishing corporate tax liabilities are the outgrowth of legal formalisms. Although many discussions of reforms of tax rules use as their starting point some rudimentary assumptions about incentives and effects, few of these discussions consider less obvious incentives and interactions or attempt to verify their analysis empirically.

This chapter will therefore focus primarily on those treatments that go beyond these typical rudimentary assumptions. The bibliography deals only with those works that go well beyond descriptive treatments and practical expositions of the legal rules in question.

JEL classification: K22, K34

Keywords: Corporate Income Tax, Tax Burden and Incidence, Corporate Financial Structure

1. Introduction and Note on Scope

Corporations, measures of corporate profits, and taxes imposed thereon are uniquely legal institutions. They have no physical reality; they are entirely the product of legal and accounting rules. But because of the importance of corporate activity in modern economies, scholars in economics and finance who have no other interest in law or legal institutions have long had an interest in analyzing the effects of corporate taxes. To the extent that this work uses economic analysis to understand and predict the behavior of firms as well as the development of legal rules, this body of literature must be considered in any review of the treatment of the corporate tax as 'law and economics'. References to works in a wide variety of methodologies are therefore included in this bibliographic review.

Much of this traditional economic literature has until relatively recently ignored almost all of the details of the coverage of the tax and the legal institutions within which the tax has developed. At least in the United

States, these details have evolved through a continuing dialog between the legislature (which until relatively recently formally prescribed only the most skeletal of rules) and the courts (which have felt free to allow the approaches of the common law to contribute to the development of the legal rules), as prompted by the Internal Revenue Service. As a result, most of the rules used in establishing corporate tax liabilities (for instance, those according to which entities are classified as subject to the tax, those according to which debt is distinguished from equity, those according to which share redemptions are distinguished from dividends, and those according to which corporate reorganizations are classified as taxable or nontaxability) are the outgrowth of legal formalisms, particularly the idea that a corporation can be an entity entirely separate from its participants. These formalisms developed without any conscious attention to their economic effect. There are therefore only a few justifications and analyses of the substantive rules of corporate taxation of the sort those well-read in other areas of law and economics might find familiar. Indeed, a leading monograph analyzing the corporate law through the lens of law and economics makes only scant reference to the possibility that taxes have an influence on the legal relationships between corporations and their shareholders (Easterbrook and Fischel, 1991). Furthermore, the evolution of most of these details has historically been, and continues to be, dominated by manipulation of these formal constructs by institutions for which there is only rudimentary understanding of their nature as 'economic' actors. Although many discussions of reforms of tax rules use as their starting point some rudimentary assumptions about incentives and effects (most commonly, that taxpayers will attempt to minimize tax burdens at least to the extent that the avoided burden exceeds the cost of avoidance and that differential treatment of economically similar transactions will produce inefficient distortions), few of these discussions consider less obvious incentives and interactions or attempt to verify their analysis empirically. (Roin, 1988; Kanda and Levmore, 1991, and Arlen and Weiss, 1995, are notable exceptions). This review will therefore focus primarily on those treatments that go beyond these typical rudimentary assumptions. Thus only a small portion of the literature considered here can be solidly classified as 'law and economics', rather than traditional economic analysis of the effect of tax laws on legal institutions.

This chapter focuses on the effects of taxes that are encountered only by incorporated entities, and does not consider the effects of taxes that are imposed regardless of the legal form in which capital is held. Thus it does not generally consider the effect of taxes on overall capital formation beyond basic questions of corporate financial structure. However, many of the works cited herein, particularly earlier works, may have (in many cases knowingly, but in other cases unwittingly) assumed a substantial congruence between

the 'business' and 'corporate' sectors, and there is, therefore, a substantial overlap with that literature. For survey treatments of capital and business taxes generally, see Gravelle (1994) and Halpern and Mintz (1992, with emphasis on Canada).

This bibliography deals only with those works that go well beyond descriptive treatments and practical expositions of the legal rules in question. The reader is cautioned, however, that, perhaps more than other areas of the law, the rules outlining the base of the corporate income tax are complex, and that assumptions about the impact of potential tax liabilities can rarely be made without a relatively sophisticated understanding of them. Comprehensive introductions to the overall income tax systems of various jurisdictions and an introductory bibliography can be found in Ault (1997); additional descriptions of the corporate tax systems in specific jurisdictions can be found in Brooks (1997) (Canada); Pender (1997) (Australia); Muten (1997) (Scandinavia); Teixeira (1997) (Portugal, Great Britain, Holland).

More detailed surveys of tax-base defining rules and rates can be found in the looseleaf services of the International Bureau of Fiscal Documentation, as well as in various pamphlet series of the larger accounting firms, including Coopers and Lybrand, Klynveld Peat Marwick Goerdeler, Price Waterhouse, and Deloitte Touche Tohmatsu International. Useful short summaries of various topics include Auerbach (1990) (the predominant features of the classical double tax), Shoven and Waldfogel (1990) (the treatment of debt and equity), Scholes and Wolfson (1991) (the general pattern of rules for mergers and acquisitions) and the international scheme generally.

Wiseman (1974), Harberger (1983) and Goode (1951) should give the reader good perspective on the early contributions of traditional economists. A useful survey of the issues raised by the presence of taxes in the traditional corporate finance literature is provided by Gordon and Malkiel (1981). Other more recent surveys of slightly different scope include that by Head (1997), Mintz (1995) (including tables showing the prominent features of the tax schemes used in various jurisdictions and providing more general background on taxes, costs of capital and risky investments), and Clossen (1997), focusing on the OECD jurisdictions.

2. Overview of the Tax

Under the 'classical' scheme for taxation of corporate income, corporations are recognized as separate taxable entities, legitimately subject to tax upon their income. Distributions of earnings to shareholders are also taxed as income to shareholders, as if they represented entirely new values available to be taxed. Such schemes essentially tax the earnings on corporate equity

investments twice, once at the corporate level as earned and later upon the distribution of the earnings to the shareholders. Bittker and Eustice (1994) provide a comprehensive summary of the complex US tax rules controlling corporate/shareholder relations. Clark (1977) provides useful insights into legal concepts behind the classification of various corporate/shareholder transactions in the classical scheme. Stephan (1990) provides a slightly more intricate update of US taxation of corporate/shareholder relations, taking into account both the many legislative changes occurring in the 1980s and more recent theoretical analysis of corporate/shareholder relations.

Not all business activity is subject, even nominally, to the corporate tax. Much business activity is undertaken by entities, including charities (Hansmann, 1981; Rose-Ackerman, 1982) and local governments, that may be entirely exempt from income taxation.

Even in the for-profit sector, there is much business activity that is not subject to corporate tax. In the classical system, the corporate tax only attaches to those entities that are in fact incorporated, or are deemed to be operating as if they were in fact incorporated. It does not attach to joint ventures and partnerships. In the US, the legal nature of business entities is a matter of state, not federal law, while the reach of the federal income tax on corporations has been a matter of federal law. As a consequence, in the US, an entity could be subject to the corporate income tax regardless of its formal legal classification as a partnership or trust.

As an historical matter, entities that enjoy limited liability, free transferability of interests, centralized management, and continuity of life traditionally were subject to corporate tax even if unincorporated. In the US, this line proved very difficult to police. See Klein (1972), Lee (1988) and Hobbes (1995) for a review of this history. Recent regulatory changes in the US have made avoidance of the classical double tax scheme elective for all but publicly traded entities. Even a publicly traded entity can also avoid the classic double tax if its activities and capital requirements can fit certain rigid structures, generally designed for entities serving as financial intermediaries, see, for example, Gergen (1997) and Clark (1975). For an overview of current thinking about the scope of the corporate tax base in the US, see Yin (1997) and Klein and Zolt (1995). In other jurisdictions, the formal legal status of the business entity is likely to determine whether the entity is subject to the income tax (Thomas, 1997).

Under the traditional income tax, an increase in the value of corporate stock is not taxed to shareholders until it is 'realized', generally, reduced to cash in the hands of the shareholders. There are recurring proposals to alter this rule, especially with respect to publicly held debt and equity (Slawson, 1967; Davies, 1975; Dodge, 1995). Under the classical scheme, dividends distributed to shareholders are taxed without offset for shareholder

investment or credit for corporate taxes paid. Increased share value, however, can be realized by shareholders by selling shares to third parties. This value can be both realized by the shareholder and removed from the corporate solution if it is the corporation, not a third party, who purchases the shares. In the US scheme, the rules applicable to such tactics sometimes leave the consequences of such transactions uncertain. Kingson (1976) and Jassy (1974) explore these rules in detail; Chirelstein (1969) explores the effects of such transactions on the remaining shareholders.

Shareholders can ordinarily enjoy the benefits of increased share value without such values leaving corporation solution merely by selling shares. When such a sale is for cash or other relatively liquid consideration, the shareholder will ordinarily be taxed. However, increased share value can often be enjoyed without any taxation at the shareholder level as a result of tax-free mergers with corporations the stock of which represents more diversified holdings or is more easily pledged, through sophisticated futures and other hedging transactions. Such tactics can result in permanent escape from income tax on increases in share value when stock need not be liquidated until after the shareholder's death because, upon death, the shareholder's basis (that is, deemed after tax investment) is increased to fair market value. Some investors, especially offshore investors, will effectively be subject to income tax upon dividend payments but not on stock sales. Finally, tax exempt shareholders, including pension plans, will be taxed neither on dividend receipt or sale, although their beneficiaries will be subject to tax upon the ultimate payout.

Most classical schemes are designed to avoid full taxation of earnings at more than one corporate level, limiting the tax burden to a 'double tax'. In the United States' income tax this is achieved by allowing a deduction for dividends received, which may vary with the extent of payee ownership in the payor corporation, and through the elimination of the ordinary consequences of asset transfers among very closely related corporations. This feature of the classical scheme, considered together with the number of shareholders that are explicitly exempt from taxation (including pension plans) and effectively exempt (including foreign shareholders), reduces the extent to which the classical scheme in fact results in double taxation of corporate enterprise.

3. Other Taxes Attaching to the Corporate Form

Corporate income taxes can be combined with various other adjunct taxes designed to offset various undesirable effects of the classical income tax or some particular implementation feature of it. Such devices include the undistributed earnings (or accumulated earnings) tax (designed to offset the

incentive to retain earnings in corporations rather than distribute them and subject them to the shareholder level tax), excess profits taxes (designed to capture the excessive return thought to be available during war time) and minimum taxes (designed to counteract perceived flaws in the ordinary rules defining the tax base). Lyon (1997) examines the inefficiencies introduced by one such tax in the US, the alternative minimum tax, the aim of which was to reduce the claimed overuse of certain incentive provisions in the US corporate income tax.

Other taxes may be specifically imposed only on corporations, including franchise and capital taxes, property taxes at special rates, net worth and gross asset taxes can be imposed with or without regard for their relation to the corporate income tax. Taxes generally imposed on property, value-added, imports, sales and sales are almost never coordinated with corporate income taxes, although such payments are ordinarily allowed as business expenses in the computation of corporate income.

The problems inherent in defining corporate income have led to recent proposals alternative measures. Knoll (1996), following Bankman (1995) sets out the conditions under which a corporate tax, imposed directly on the corporation, for increases in its total market value would replicate the current, accounting based tax. The possibility that even a perfectly defined income tax creates disincentives for investment has fueled additional proposals for substantial changes in the definition of the tax base that includes corporate income. Zodrow (1997), King (1987) and Auerbach (1990) build on earlier work to propose a corporate cash flow tax that would sever a corporate tax from its routes in profit accounting and eliminate any tax-driven biases regarding corporate structure and investment; the base of such a tax could be approximated to all current distributions to shareholders (both of dividends and share repurchases) by reducing corporate receipts for all new investment.

4. The Origins of the Corporate Income Tax

The earliest attempts to impose taxes upon corporations, rather than upon any particular corporate activity or holding, appear to have origins in efforts to include individual wealth represented by corporate interests in property tax bases. Taxation of the corporation itself could serve as a surrogate for taxation of the wealth of the shareholder, and would be preferred by those jurisdictions which could claim that the corporation was entirely within its taxing jurisdiction, even if its shareholders were not. Initial efforts focused on the par value of the stock, or its paid in capital, but as it became clear that these legal and accounting concepts had no economic meaning, jurisdictions either switched to, or added, corporate income as the measure of the tax.

Further support for the tax derived from the notion that doing business as a corporation was a privilege for which charging a fee or franchise tax was appropriate. (These franchise taxes are thought to have played an important part in the competition among states for the most attractive law governing corporate shareholder relations, see Cary, 1974, pp. 668-669.) With the possible exception of the privilege of limited liability (which is now frequently available without subjection to the classical tax regime), this justification now has limited appeal. A good survey of the historical attitudes in the US can be found in Goode (1951, pp. 24-43).

The introduction of the modern corporate income tax at the federal level in the US has alternatively been explained as an early effort to respond to the popular pressure to regulate corporate activity without infringing upon the state's prerogatives in corporate law (Kornhauser, 1990). The details of its later development has been described (by a political scientist reaching conclusions that except in their general optimism, resemble a public choice approach) as a reflection of a coalition between elected government and the business community to promote economic growth (Martin, 1991).

5. Modern Justifications for the Corporate Income Tax

Some early writers simply assumed that the corporation, as a separate legal entity, was appropriately subject to tax. Corporate income taxes remain politically popular, especially among those who view corporations as sources of wealth entirely independent of shareholders, employees or customers. But most modern justifications for the tax are even less unsatisfying than those relied upon historically. Some justify the tax as necessary to secure the goals of other tax regimes. When corporate income tax is part of a larger scheme of income taxation, particularly a scheme with substantial redistributive goals implemented through progressive rates, the corporate tax can be viewed as an expedient buttress to the income tax. Without a corporate tax, the personal income tax would be substantially undermined by entrepreneurs who could shift the return on their efforts into untaxed corporate profits. (Gordon and Mackie Mason, 1995, explore this rationale as an explanation for the presence of corporate income taxes even in small capital importing jurisdictions.) Even if taxation of return to effort were not at issue, corporate earnings would be retained, providing economic benefit to shareholders, outside of the reach of the income tax. Under this justification, the corporate tax serves as a withholding tax to insure at least minimum correspondence with the nominal personal income tax scheme. This rationale, however, can only justify the imposition of the tax upon the income when realized by the corporation, not the failure to avoid taxing the remaining value again upon its distribution to shareholders (Gabinet and

Coffey, 1977). Alternatively, the corporate income tax would be fully justified, however, as a means of buttressing the personal income tax in cases in which jurisdiction is lacking to tax shareholders (Musgrave, 1987). Under this justification, however, some credit for corporate taxes paid should be allowed at least to domestic taxpayers.

Some claims have been made that the corporate tax under the classical scheme can be justified because of certain other economic characteristics of corporations. (Caution must be used in relying upon such justifications, since there is unlikely to be an identity between the entities attracting the tax and these characteristics. Only relatively recently have the rules for determining which entities will attract the tax actually reflected any of these justifications.) Early writers relied upon the benefits of limited liability to justify the imposition of tax. Goode (1951), Break (1969) and Rudnick (1989) all suggest that liquidity, resulting both from marketability and from the limited liability ordinarily afforded to shareholders, justifies attracting an entity level tax. Kose, Senbet and Sundaram (1994) outline the contours of a tax that would more precisely internalize the costs of limited liability.

Stiglitz (1973, 1976) posits that the corporate tax should be viewed as only a tax on pure profits and entrepreneurship, a tax which allows the government a partial return on an implicit partnership with the owners of equity. This view relies heavily on the notion that all ordinary returns to capital can be paid out as returns to debt finance which returns are not subject to tax because they are deducted from corporate income, but does not attempt to reconcile the actual contours of the tax with this description given the fact that corporations frequently do not appear to be so fully leveraged. Head (1997) provides an in-depth examination of these various explanations of the corporate tax in light of the current finance literature.

Even if the corporate tax can only be explained as an historical accident, its persistence in the face of its apparent inefficiencies remains an enigma. One possible explanation is that corporate managers have little incentive to lobby to eliminate the corporate tax, or to otherwise integrate the personal and corporate taxes, when they can enjoy a higher payoff from lobbying to alter the corporate tax base in ways that benefit them as managers even if integration or elimination would benefit shareholders more (Arlen and Weiss 1995).

Still others have suggested that the corporate tax can serve to avoid the agency costs that would be incurred if other means were used to resolve the conflicts over timing of income among stakeholders facing different tax consequences upon corporate asset sales and distributions (Kanda and Levmore, 1991; Snoe, 1993).

Cooper (1994) considers the possibility that corporate managers consider tax compliance as a financing and investment decision, and the implications of this view for tax administrators.

6. The Definition of the Corporate Tax Base

Perhaps because there can be no economically sound justification for the corporate income tax under the classical scheme, there has been little serious effort to develop an economically sound measure of the corporate income tax base (Levmore, 1988). (This is in stark contrast with the individual income tax base, for which the combined articulations of Georg Schanz, Robert M. Haig and Henry C. Simons (Simons, 1938) provides the most common measure.) There is a general consensus, for instance, that the current standards for base-defining are far from that which would justify the corporate tax as merely a tax on economic rents under the Stiglitz view (Bond and Devereux, 1995).

The few preliminary attempts have merely deduced from the existing accounting rules defining the corporate base that their overall purpose seems to be the taxation of all income, above and beyond the contributions made by the shareholders, that the corporation can be expected to make available to shareholders in the future (Bryan, 1984; Crane, 1988). Levmore (1987) suggests that at least some of the rules used to define the corporate tax base and which govern corporate shareholder relations serve to constrain managers in an efficient way. Repetti (1997) explores some more closely tailored efforts in the US to manipulate the incentives of corporate managers through particular base-defining provisions.

The corporate tax base is frequently defined so as to identify a base only roughly equivalent to profit for other purposes. Accounting for tax purposes may deviate substantially from accounting for financial, rate-making or internal purposes. Some such disparities are introduced to overcome the bias of financial accounting against overstating earnings. Cummins, Harris and Hassett (1995) offer some preliminary analysis of the relative effects of such 'one-book' and 'two-book' regimes, as well as survey information on various tax schemes in place. Other disparities between book and tax income are deliberate preferences, introduced to provide incentives for investment, sometimes available only for investment by entities subject to the corporate tax. Auerbach (1982) and Hulten and Robertson (1982) examine the accelerated depreciation scheme in place for a brief time in the US in the early 1980s, which under many plausible conditions, and in connection with mechanisms for transferring tax losses that temporarily moved the US system closer to full loss offsets (see Gravelle, 1982), effectively eliminated the corporate tax. Interest generally is deductible, producing a potential bias

against equity and in favor of debt financing (see Warren, 1974, and below). Although preferential treatment may be available for capital gains, the corporate tax base frequently includes extraordinary gains as well as income from operations.

Corporate income is ordinarily computed on an annual basis, with only clumsy mechanisms for carrying back and forward losses to smooth out income. Among the shortcomings in such mechanisms are nonrefundability and an unwillingness to allow the loss incurred with respect to one corporate investment to be available to shelter the gain from a previously unrelated investment, or to allow adjustments for the timing of payment and refund. Many systems provide for carrybacks and carryforwards of losses, but few provide for full loss offsets. Failure to provide such offsets may affect the type of risks undertaken and may provide an advantage for diversified over undiversified firms (Romano and Campisano, 1981). Those firms with loss carryforwards ordinarily face a lower than statutory rate on earnings from new investments (since carryforwards effectively postpone tax payments), while those with carrybacks face the statutory rate (since carrybacks produce current refunds). Auerbach and Poterba (1987b) find that the presence of such carryforwards can have significant effects on investment incentives.

Although corporate income is taxed both to the corporation and when realized by shareholders, most classical tax schemes include some mechanism whereby additional levels of corporate tax are avoided. Dividends from wholly-owned subsidiaries are frequently eliminated entirely in the measure of corporate income; dividends on portfolio stock maybe partially eliminated; certain other transactions among related, and sometimes even among unrelated, corporations may be given special tax accounting treatments (see generally Mundstock, 1988).

As noted above, interest paid on debt is generally deductible, while returns paid on equity are not. Despite the apparently enormous consequences, distinction between debt and equity is not easily maintained, Plumb (1971) contains a thorough examination of the case law attempting to establish the distinction; Bulow, Summers and Summers (1990) examine more recent devices used to obtain debt tax treatment for equity investment. Scholes and Wolfson (1990) explore the extent to which this distinction can be exploited to avoid the double tax completely; and ultimately conclude that, as long as competitive investment is available, full self-help integration is not possible.

7. Measures of Corporate Tax Burden and Incidence. Establishing Effective Corporate Tax Rates

Despite the obvious significance of the question, very little conclusive analysis or reliable data is available regarding the actual burden of the corporate tax. Frequently, information about the tax liabilities of particular firms is simply not available. It is generally accepted that effective corporate tax rates are likely to differ from statutory rates in at least three important ways, even if tax payments can be matched with reliable information about income for tax purposes. First, if the permanent preferences that are available for certain types of corporate income (as are commonly offered for corporate dividends paid on stock held by corporations) have been capitalized, an implicit tax will reduce corporate tax payments without increasing corporate after-tax income. Second, some express preferences reduce current corporate tax liabilities but increase future tax liabilities, resulting in deferred taxes. Third, tax accounting rules (such as the limitation on corporate capital losses) will frequently result in additional timing disparities that make comparisons of tax payments with corporate income in any one year difficult.

Perhaps the most controversial efforts to estimate the effective corporate tax rate in the US have been prepared with the popular press in mind. McIntyre and Folen (1984), McIntyre and Wilhelm (1986), Marovelli and Moser (1990) provide calculations of effective corporate tax rates in the United States based on publicly available data; such analysis frequently is limited by the fact that it can compare only current taxes with current financial income, with no accounting for implicit taxes or even for deferred taxes. Dworin (1985) demonstrates how difficult reliance on such data can be. A somewhat more sophisticated analysis is offered by Shevlin (1990). Collins and Shackelford (1990) attempt to use data available from financial statements to establish average effective tax rates in various jurisdictions. Auerbach and Poterba (1987a) provide some more meaningful measures of corporate tax payments in the United States from the mid-1950s to the mid-1980s. Mintz (Canada, 1985) and Mayer (United Kingdom, 1986) analyze the effect of loss carryovers on tax rates.

It must be noted that effective tax rates on capital are difficult to determine without taking into account personal taxes as well as corporate taxes and the interplay between personal taxes, corporate taxes, the form of business organization and the form of financing, for example, King and Fullerton (1984). But in the presence of an open international market these relationships may not hold.

8. Incidence of Corporate Tax

Although the primary legal incidence of the corporate income tax is on the corporation itself, the economic incidence is uncertain. If corporate investment must take the form of equity, and if current earnings must be distributed, the classical system will create a bias against investments in corporations, but the prevalence of those conditions is uncertain. Furthermore, the use of the corporate form to allow maximum use of preferences for capital gains and basis step-up at death for share appreciation when earnings can be retained, the availability of preferences only for investment in corporate form, and the use of debt as a means of distribution for those returns that cannot be retained all mitigate the bias against investment in corporate form.

Nevertheless, it is generally assumed that the classical corporate tax system raises the corporate cost of capital and therefore increases the share of capital allocated to the noncorporate sector. Under such a view, the burden of the corporate tax might well be ultimately borne equally by corporate and noncorporate capital owners, but the distorting effects on the allocation of capital between corporate and noncorporate are great (Harberger, 1962, 1966; Shoven and Whalley, 1972; Shoven, 1976; Ballard et al., 1985; Gravelle and Kotlikoff, 1989; but Harberger, 1983). McLure (1981) provides a perspective on this literature and applies its insights to questions regarding the determination of sub-national tax incidence. Rogers (1996) provides a useful summary of the research and issues.

Empirical work regarding the incidence of the corporate income tax has been, and is likely to remain, inconclusive. In one early and interesting effort, Krzyzaniak and Musgrave (1963) contended that corporations are in fact able to more than fully recoup additional taxes, but were quickly criticized by many, including Cragg, Harberger and Miezowski (1967) and Slitor (1966). Fullerton and Lim Rogers (1993) report that because very little corporate tax is actually paid, its effect in the United States is primarily through relative price changes, and that because those who are relatively poorer spend more of their incomes on goods produced in the corporate sector, and thus bear a relatively higher burden.

9. Corporate Tax and the Choice of Business Form

Very few of the jurisdictions committed to a classical corporate tax attempt to impose taxes on aggregations of business capital or business activity that would remove the tax disincentive to use the corporate form. (However, one such proposal was included in US Treasury, 1992.) Hence there is likely to

be a bias against incorporation where non-tax considerations allow the activity to be conducted and the required aggregation of capital without incorporation. The bias against suggested by the classical double tax scheme will not be present, however, if the corporate tax rate is substantially lower than the individual tax rate, whether because of difference in statutory rates, or because of special provisions (including deductions for deferred compensation and cost recovery) available only to corporate taxpayers. Such conditions were likely to be present in the US prior to the mid-1980s. Auerbach (1997) summarizes the changes in US law introduced in 1986.

The bias against moving capital into corporate form seems likely to have increased given the increasing availability of limited liability, in the US at least, without submission to a corporate level tax. For summaries of the changes in US legal rules that have led to complete avoidance of corporate level tax for new business investment in the absence of public trading, see Burke (1995).

The overall impact of the incentives against moving capital into corporate form remains undecided. Mackie-Mason and Gordon (1997) and Gordon and Mackie-Mason (1994) report that changes in organizational form are sensitive to changes in tax rates. Gordon and Slemrod (1998) concur, demonstrating that much of the apparent rise in personal incomes in the US after 1986 resulting from shifts in business activity away from the corporate form, implying a strong response.

Finally, even if the double tax aspects of the corporate tax do not entirely discourage incorporation, they are likely to affect the ways in which capital is provided to corporations, since returns provided as wages, interest, rents, and royalties will be deducted from the corporate tax base while returns on equity contributions will not.

10. The Corporate Tax and Corporate Financial Structure

Under the classic corporate tax, dividends are not deducted from corporate income as paid, but in general interest is deducted as it accrues. It is generally accepted that the resulting removal from the corporate tax base of returns to debt is likely to create a strong incentive toward financing with debt. Indeed, if all corporate earnings are paid out as return on debt financing rather than return on equity, the disincentive resulting from presence of the corporate tax to use the corporate form can be eliminated. There is a general consensus, however, that there is not as much corporate debt as would be expected if taxes were the only consideration. Good general summaries of the issues and current research in the US can be found in Scholes and Wolfson (1992) and Auerbach (1990).

The fact that the classical corporate tax provides an incentive to finance through debt does not, however, suggest that only debt be issued, despite Modigliani and Miller's early suggestion (1963) that the optimal source of all capital should be debt in the presence of such a preference. Miller (1977) observed that at some point, the price that must be offered to attract debt financing will offset the tax advantage of debt, at least if there is any preference for returns on equity. Furthermore, other aspects of tax accounting and tax preferences will make some firms less able to take advantage of the tax incentive afforded by debt, and may result in lower levels of debt (DeAngelo and Masulis, 1980).

Although it is hard to explain changes in the amount of corporate leverage without understand more about the phenomenon generally, several empirical studies suggest that corporate debt levels do indeed respond to relative tax rates on corporate income. Auerbach (1985) (finding relation between debt levels and low effective rates resulting from carryforwards, but not composition of asset cost recovery), Bartholdy, Fisher and Mintz (1985) (a one-point increase in Canadian corporate tax results in 3/4 point increase in corporate debt/equity ratio), Mackie-Mason (1990), Graham (1996) and others have attempted to estimate the sensitivity of this relationship (Rangazas and Abdullah, 1987). Gentry (1994) shows an increase in debt by firms who can pass-through tax losses to investors. Schulman et al. (1996) report that imputation integration in New Zealand and Canada reduced debt/equity ratios. Others, however, have failed to find tax effects on levels of corporate borrowing (Ang and Peterson, 1986; Bradley, Jarrel and Kim, 1984). Taggart (1985) concludes that although tax factors have played a role in the increased debt levels of corporations in the United States, they do not provide a complete explanation; Gordon and Mackie-Mason (1990) similarly find less response to taxes than predicted.

Even less certain is whether this possible distortion in favor of debt financing should be considered inefficient. The discipline that debt brings to managers is likely to reduce agency costs, but the losses occurring as a result of the incentive to choose less risky and shorter termed investments which are not wealth-maximizing may outweigh them. Full consideration of equity/debt and corporate financial structure beyond the scope of this article; more general surveys of optimal capital structure can be found in Barclay, Smith and Watts (1995), Myers (1993), Harris and Raviv (1991), Taggart (1985), Auerbach (1985) and Jensen and Meckling (1976).

11. The Corporate Tax and the Incentive to Distribute Corporate Earnings

Under the classic corporate tax, individual shareholders that receive dividends are taxed on the full amount of those dividends, usually without preference and without offset for their investment in their shares. Shareholders who realize their returns through the sale of shares, on the other hand, frequently enjoy a capital gains preference, and can offset proceeds with investment basis on all sales of shares. They may be able to avoid tax entirely through the rules avoiding income tax on gains remaining unrealized at death. (Although this fact is almost entirely overlooked in the analytical literature mentioned below, there are significant exceptions to this general pattern of tax burden on dividend payments in the US. First, payments denominated 'dividends' will be subject to only capital gains taxation if there are no corporate earnings for tax purposes ('earnings and profits'), even though ordinarily there must be earnings for corporate law purposes in order for dividends to be paid. Such 'return of capital' dividends are highly likely when cost recovery allowances for tax purposes exceed similar allowances for corporate law purposes, and when corporations are successful in engaging in restructuring transactions which reduce earnings for tax purposes. Second, only individual shareholders are in fact subject to the double tax: corporate shareholders are allowed to eliminate a substantial portion of dividends paid by domestic corporations, and tax-exempt entities, including pension plans, pay no tax at on dividend receipts at all.)

This disparity between the tax treatment of shareholders who receive dividends and shareholders who participate in sale transactions led to an early debate about whether the regular payment of dividends lowered share prices and required higher dividend rates, for example, Litzenger and Ramaswamy (1979, 1982), Bradford and Gordon (1980), Miller and Scholes (1982), Morgan (1982), Poterba and Summers (1984), Wu and Hsu (1996). This disincentive would not, however, affect dividend behavior if the share price of corporate stock is set by investors for whom the tax impact of dividends and capital gains are the same (Miller and Scholes, 1978). Miller (1986) reviews this literature. Similarly, it is frequently supposed that the classic corporate tax provides a imposes a cost on the distribution of earnings, and that an increase in the tax cost of dividend distributions should result in a lower level of dividend payouts. Some empirical studies support this view: Brittain (1966) (analyzing US dividend behavior from 1920 to 1960); Feldstein (1970) (British firms from 1953 through 1964); King (1971, 1972) (British firms from 1949 through 1967), but Feldstein (1972); Poterba and Summers (1985); Poterba (1987) (US firms through 1986).

On the other hand, there should be no incentive to avoid distribution of corporate earnings simply to avoid the shareholder level tax on the

distribution, if those earnings must eventually be distributed and must be subject to the same tax in the future. (Under this view, the tax cost of a distribution must decrease the overall return to the shareholder, whether it does so on an immediate distribution that reduces the net-after-tax amount received by the shareholder now, or whether, if the earnings are retained, reinvested, and distributed in the future, it reduces the net-after-tax amount received by the shareholder on that future distribution (Auerbach, 1990). Thus, there should be no effect on the *marginal* investment decisions of firms as a result of the double tax resulting from the taxation of dividends. Although the tax treatment of dividends should create a disincentive to new contributions to firms through new share issues and should generally reduce the amount by which such new share issues increase the value of the firm, this tax treatment would not change the firm's dividend behavior, which would be governed by nontax considerations. In the absence of any significant nontax benefits to distributions, the firm would pay dividends only when no profitable investment could be made. A permanent change in the tax on dividends would not affect distributions, but would operate only as a charge on retained earnings and on new equity contributions. Under this view (sometimes still referred to as the 'new' view), equity is 'trapped' in corporate form, and the inevitable tax on payout is capitalized into share price. Early contributions supporting this view include King (1974, 1977), Auerbach (1979, 1983b), Bradford (1981).

In fact, however, the future tax on distributions can be avoided in several ways: (1) if no current distribution of corporate funds is ever made and the shareholder's return is received through the sale of stock (especially when this return is, as is frequently the case, entitled to a special capital gains rate or to the benefit of forgiveness at death through stepped up basis) and (2) distributions are made from the corporation in the form of share redemptions (not permitted in all jurisdictions) and distributions made in connection with acquisitions, both of which may also be subject to more favorable tax treatment. If corporate earnings can be transformed without significant cost to borrowings (for instance through redemptions of stock held by exempt shareholders) there may in fact be little or no disincentive for current distribution of corporate earnings through such non-dividend techniques. Shoven (1987) reviews the tax consequences and provides estimates of such behaviors by firms in the 1970s and 1980s. Bagwell and Shoven (1989) provide a useful summary of the various incentives faced by corporate managers and conclude that the increased use of non-dividend techniques for distributions to shareholders may be attributable to the simple phenomena of an increased awareness and understanding of the 'technology' of implementing such devices under relatively complicated tax rules.

The debate about the limitations inherent in the assumptions necessary to the 'new view' and the implications of the new view remains unresolved. Most agree that for the traditional view to hold, there must be some countervailing benefit to the corporation or its managers upon the distribution of dividends, but there is little agreement as to whether those benefits include signaling or merely provide a mechanism for disciplining corporate management. If there is such a benefit, it may be exceeded by an increased tax cost of dividend distributions and, therefore, increased tax burdens on dividends would decrease dividend payouts. Most also agree that one strong implication of the new view is that the net value of the firm's shares must be less than the total value of the firm's assets. Such a discount to share value would be present unless there were some inherent advantage to investments conducted through the corporate form, but the identification of this advantage has been elusive (and will likely remain elusive as the tax law, at least in the US, continues to shift). This appears to have led some to conclude that the new view can hold only if share repurchases are prohibited, since if they were not, firms would simply repurchase shares until the discount was eliminated. Sinn (1991c) argues that the traditional view implies that corporations do not minimize their cost of capital, and further that the new view is plausible even when share repurchases can be made, so long as limits on such devices are present. Zodrow (1997, 1991), Poterba and Summers (1985) and Sorensen (1995) also elaborate upon the implications of the 'traditional' and 'new' views. Zodrow (1997) and Gerardi, Graetz and Rosen (1990) both conclude, after reviewing the empirical literature, that it primarily supports the traditional view.

Perhaps the most significant practical implication of the new view is that to the extent that the new view is correct, the burden of the double tax on corporate dividends is capitalized in the market value of its shares. Any lessening of the burden of double taxation through any form of integration would therefore create a windfall for shareholders of firms with retained earnings. The likelihood that the new view is correct at least to this extent explains at least part of the reluctance in the US to move toward full integration (Hubbard, 1993; Halperin, 1992, considering the conclusions reached in American Law Institute, 1979, 1989).

12. Jurisdiction over the Corporate Tax Base and Sufficiency of Nexus to Tax

Corporate economic activity frequently ignores the political boundaries by which jurisdiction to tax is ordinarily assigned. Rarely are there constitutional barriers to the assertion by each polity with which the activity

has some minimal nexus asserting the power to tax such economic activity and to define the base according to which that tax will be assessed. Nevertheless, most polities acknowledge a need to avoid overtly duplicative taxes, especially when the chosen base is income. A good survey of the issues and patterns of solutions can be found in Easson (1997).

There are two principal approaches that can be used to assign taxing power among competing taxing polities. Under an assignment or sourcing method, each polity adopts rules according to which a corporation's income is categorized as most closely related to one taxing jurisdiction. If more than one jurisdiction asserts the power to tax this income, a credit can be given (generally by the home polity) for the taxes paid elsewhere (generally the foreign site of the economic activity). McIntyre (1994) provides an overview of this approach as applied by the United States; Green (1993) Ault and Bradford (1990) and Hufbauer (1992) highlight the issues inherent in its use. Under the apportionment method, a corporation's income can be apportioned to each taxing jurisdiction according to a formula that takes into account the location of the business activity (frequently sales, payroll and property). Even if two jurisdictions adopt the same approach to avoiding duplicative taxes, there is rarely any device for ensuring that the implementation of the approaches are consistent. Avi-Yonah (1995) explores agency-theory-based rationales for the approaches taken for operational and passive income. Each state in the United States, for instance, is free to define its own apportionment formula so long as that apportionment formula, if adopted by every state, would avoid duplicative taxes (McLure, 1986; Gordon and Wilson, 1986; Hreha and Silhan, 1986).

Each of these approaches must include variants to take into account the fact that frequently corporate activity that encompasses more than one jurisdiction will be undertaken by more than one formal corporate entity. Generally, jurisdictions (including the United States) that rely on an assignment approach will require that transfer prices among entities be at 'arm's length' prices so as to avoid jurisdictional distortions (see generally Avi-Yonah, 1995). Jurisdictions that use an apportionment method are likely to require that all related corporations 'combine' their income, so that apportionment will take into account all related entities.

Each approach must also consider how to treat transfers of dividends to related corporations that are not wholly or exclusively subject to their taxing power. Under the assignment method as implemented by the United States, income of foreign subsidiaries will ordinarily not be subject to United States' tax as earned, but will be subject to United States' tax as it is repatriated as dividends, and a credit for foreign taxes paid will be available upon repatriation. Under a fully combined apportionment method, dividends paid to related corporations should be ignored.

Finally, it is highly likely that any one taxing scheme will, at least in some of its details, include features from both approaches. For instance, despite the fact that the United States in general uses sourcing with arm's length pricing to establish the taxable income of multinational groups, since 1986 interest expense must be apportioned according to asset holdings. (For an analysis of this change, see Froot and Hines, 1995; Altshuler and Mintz, 1995.)

There is at least some evidence that sourcing systems impose significantly greater compliance costs than apportionment systems (Blumenthal and Slemrod, 1996).

13. Effect of Corporate Taxes on Investment in Multinational Economies

Although it might not be obvious to the modern observer, the pattern of taxation for multinational businesses was the product of more systematic thinking than many other areas of US federal taxation. Graetz and O'Hear (1997) recount the role of early economists in this history. Picciotto (1992) provides an exhaustive review and analysis of the current patterns. A good summary of the relevant rules and a straightforward review of the most prominent empirical research can be found in Hines (1997). (In this review, Hines concludes that real responses to taxes are as one would expect: there tends to be more direct investment where corporate tax burdens are anticipated to be lower.) Gordon and Mackie-Mason (1995) offers interesting speculation about the incentives leading to the prevailing patterns of international tax, and conclude that significant parts of the current pattern reflect the need to preserve the personal income tax on the return to entrepreneurial labor.

Some jurisdictions, including the US, claim the right to tax all income, domestic and foreign, of their resident taxpayers, including corporations. However, in keeping with the classical corporate income tax, the income of separately incorporated foreign entities conducting active businesses is ordinarily not subject to US tax until it is repatriated through dividends. Hartman (1985) theorized that if such repatriation taxes are unavoidable, their existence should not affect the decision whether to repatriate or reinvest in the source jurisdiction, essentially applying a 'trapped equity' analysis to the repatriation decision. Hines (1994) and Leechor and Mintz (1993) point out that variations in income-defining rules can be sufficient to alter this result. Empirical studies (Goodspeed and Frisch, 1989; Hines and Hubbard, 1990; Altshuler, Newlon and Randolph, 1995) suggest that repatriation taxes do in fact vary sufficiently to provide other incentives. Hines (1997) suggests that the tax costs of repatriation may encourage undercapitalization of foreign subsidiaries so that profitable opportunities

remain for the reinvestment of retained earnings, and notes that this incentive may make attempts to measure the influence of foreign tax rates on foreign direct investment. Roin (1988) develops a public choice analysis of the exceptions to the limitations on deferral for relatively passive foreign activities.

In the US, a credit against domestic taxes is allowed for foreign taxes paid. It has sometimes been assumed that the foreign tax crediting device used by the US results in a lower national return on foreign direct investment by US corporations than the national return on displaced domestic investment (for example, Dutton, 1982). Recent analysis suggests that the loss due to taxes yielded to the foreign jurisdiction may be offset by the overall greater return resulting from lower costs of foreign capital (Feldstein, 1995).

At the multinational level, all of the possibility of tax effects on choice of form and financial structure found domestically are present, with additional possibilities resulting from the variety of rates, the special treatments afforded by treaty, and the arbitrary and inconsistent nature of the rules used by the various jurisdictions for allocating items affecting measures of income. Predictably, multinationals structure their transactions in ways that, for instance, yield accounting profits in low tax jurisdictions and place the tax shields afforded by debt finance. Hines (1997) reviews the empirical studies evidencing this behavior.

Among the most difficult, and yet most fundamental, problems in analyzing the effect of national corporate income taxes on corporate behavior and general business investment is a determination of the effective tax rates in the various jurisdictions to be studied. The problem is complicated by the fact that stated nominal tax rates and published legal rules are unlikely to provide complete information about the tax burdens actually felt by corporations. The most ambitious empirical study, and an enormous amount of data regarding rates and bases can be found in OECD (1991). Attempts to further analyze and update such data include Jun (1995).

14. The Corporate Tax and Corporate Mergers and Acquisitions

Any corporate income tax scheme, whether classic or integrated, must set out criteria for determining when transactions relating to corporate assets and to corporate stock interests will be treated as events that will trigger corporate income tax. (Such events frequently will trigger all unrealized gain on assets and will trigger reconciliation of various suspended accounting preferences.) The US scheme has evolved largely through judicial interpretation with only limited statutory modification. Very little

attention has been given to the distortions created by the resulting framework, perhaps because the framework, although arcane, provides sufficient flexibility.

Under the US scheme for taxing restructuring transactions, shareholder realization is frequently tied to corporate realization, and flexibility in accommodating all shareholder interests may be difficult. Ginsburg and Levin (1996 and updated regularly) provide an intricate account of the current US rules. Some changes in control will be treated as merely continuing the tax existence of a corporation, and thus will not result in the triggering of gains on assets, the loss of grandfathered accounting methods, or the discontinuance of carryover tax losses. Other changes in control may be treated as discontinuous, and will trigger gains, force new accounting methods and cut off unused losses. Under certain circumstances prior to 1986, however, such a change in control that is treated as discontinuous could have produced a highly desirable result for US corporations, since it allowed a step-up in tax-basis of assets held at the corporate level without the payment of corporate level tax.

These rules must establish highly arbitrary distinctions upon which rest frequently enormous stakes. For instance, sales of stock among shareholders will not ordinarily trigger gain on corporate assets, since the formal identity of the owner of the assets has not changed, but transfers of assets to different corporate entities will trigger gain on those assets unless there is substantial overlap between the owners of the new entity and the owners of the old. Therefore when an existing corporation is acquired, there can be enormous tax differences depending upon whether the transaction is viewed as a transfer of assets or of stock. To complicate things further, corporate tax regimes frequently will include special rules designed to mitigate the arbitrariness of such distinctions, but that make it still harder for observers to ascertain the effect of any particular set of rules. (For instance, until 1986, the United States allowed certain purchases of corporate stock to be treated as purchases of stock for the purpose of taxing shareholders, but as purchases assets for the purpose of the corporate level tax. This special rule was available only if the purchaser was a domestic corporation that acquired at least 80 percent of the stock of the target.)

These arbitrary distinctions clearly have an enormous influence on the form that changes in corporate control take. It is less clear, however, whether they have any effect upon the frequency or price at which changes in corporate control occur. In the older literature it was generally assumed that at least some some changes in corporate control occurred in which the only motivation was tax-related (see Feld, 1982; Hellerstein, 1959; Butters, Lintner and Cary, 1951).

More recent literature suggests that at least in the aggregate, the presence of tax gains are not as certain to have increased acquisition activity.

Auerbach and Reishus (1988a) provides a useful summary of the various incentives in US law. Gilson, Scholes and Wolfson (1988) review the overall interaction of the pre-1986 United States tax rules most frequently thought to produce tax gains from acquisitions, and conclude that many such gains could be accomplished in other ways. Their conclusions seem too dependent on the availability of other means of accomplishing the tax gains, which although plausible for some tax gains when viewed separately, seem less likely to be available in conjunction with other tax gains and with other goals. Another study by Auerbach and Reishus (1988b) however, concluded that in at least a fifth of the mergers studied, occurring between 1968 and 1983, the merger allowed a corporation to free itself from constraints on the use of tax benefits but did not find useful measures either of increased cost recovery or increase debt shields. One survey of transactions concluded that the primary gains from management buyouts were tax gains (Lowenstein, 1985). Jensen, Kaplan and Stiglin (1989) argue that certain acquisition activities actually increase tax revenues, although Bulow, Summers and Summers (1990) demonstrate that an increase in revenue is not necessarily inconsistent with a tax incentive derived subsidy.

Some of the earlier writing regarding tax-motivations for corporate acquisition activity assumed that such activity would be socially undesirable. Several recent writers have challenged this assumption in passing, and offered several possible scenarios in which tax-motivated acquisition activity could produce social gains. Tax gains from various acquisition activities could, for instance, increase the premium for successful searches for operating efficiencies through acquisition activity (Gilson, Scholes and Wolfson, 1988); or restore incentives for investment by restoring tax incentives for investment that are weak in the absence of positive corporate tax liabilities (Auerbach and Reishus, 1988). Changes in the US law in 1984 (eliminating the possibility of stepping up depreciation deductions without a corporate level tax), and in 1986 (generally eliminating the exemption from capital gains taxation for distributed assets imposing additional limits on the use of carryover losses after a merger transaction), have substantially decreased the likely to be obtained through merger activity. The changes appear to have lessened interest in the study of tax motivations for merger activity, despite the possibility that data reflecting the change in tax regimes may be more useful than that studied previously. An analysis of these changes, and some discussion of their impact appear in Scholes and Wolfson (1991). Hayn (1989) provides an interesting study of the effect of the value of tax attributes on merger activity for which a IRS ruling was requested.

15. Integration of Corporate and Individual Level Income Taxes

Under 'integrated' schemes, various devices are used to attempt to eliminate or minimize this double tax effect. Among the simplest of such devices is a 'passthrough' of corporate income to the shareholders even in the absence of a distribution of earnings, producing a liability at the shareholder level even if the corporation retains the funds generating the liability. Later distributions of corporate earnings are not subject to tax. (Although the classic scheme prevails for capital transferred to corporations before 1986, an increasing number of US enterprises can enjoy both passthrough integration and the limited liability associated with incorporation by using either the special rules available under subchapter S of the Internal Revenue Code (at the cost of a being restricted to a very limited number of shareholders and corporate structure), or by using the newly emerging limited liability company (at a cost of uncertainty regarding both the tax consequences and the default rules governing stakeholder relations).) Yin (1992) and Warren (1981) provide an exhaustive summaries of the available choices for implementing integration from the starting point of the classical system in the US.

Integration can also be accomplished by allowing dividends to be paid without tax consequence to shareholders. Other more complicated integration devices include a corporate level tax, with a credit for such tax to be claimed by the shareholder upon the ultimate distribution of the earnings and after the amount of tax actually paid is imputed as part of the distribution (Australia, New Zealand, Canada, France, the United Kingdom and Germany all have used some form of imputation credit to accomplish varying degrees of integration), a split rate tax (under which distributed earnings are taxed at a lower rate than undistributed earnings, used by Japan and Germany), or a credit to the paying corporation upon the distribution of dividends. To the extent that the anticipated burdens of the classical double tax have been capitalized in existing capital, the considerations involved in moving from a classical scheme to an integrated scheme differ from those that would be considered prior to the imposition of any tax because a transition device would be necessary to avoid a windfall to existing corporate holdings. It is not clear, however, that such windfalls would be present, as suggested by the lack of price response to the announcement of integration in the United Kingdom in 1970 revealed by Poterba and Summers (1985). Auerbach (1990), McLure (1979), Sunley (1992), Cnossen (1993) and US Department of the Treasury (1992) provide in-depth discussions of the circumstances under which various approaches to integration might be desirable.

International considerations make integration issues even more difficult, especially since there is no consensus about whether the jurisdiction to tax should lie primarily with the jurisdiction in which business activity is

conducted or the jurisdiction whose resident is supplying capital through share or debt ownership. Uncertainty about tax effects in open and closed economies makes evaluations of integration proposals especially difficult (Boadway and Bruce, 1992; Devereux and Freeman, 1995). Under the more common approaches to the integration, relief from double taxation is appropriate only for resident shareholders (Ault, 1992; Doernberg, 1992).

Bibliography on Corporate Taxation (6060)

- Abbott, Ashok Bjardway (ed.) (1987), *The Valuation Effects of Tax Legislation in Corporate Sell Offs*, Ph.D. Thesis, Virginia Polytechnic Institute and State University.
- Aivazian, Varouz A. and Turnbull, Stuart M. (1988), 'Taxation and Capital Structure: A Selected Review', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 230-277.
- Allen, Franklin (1989), 'The Changing Nature of Debt and Equity: a Financial Perspective' (Discussion), in Hart Oliver D. and Merton Robert C., *Are the Distinctions Between Debt and Equity Disappearing?*
- Allerdings, Jeffrey Paul (ed.) (1992), *The Effects of the Corporate Alternative Minimum Tax on Corporate Tax Liability*, MS Thesis, San Francisco, State University.
- Allsop, Peter (1991), 'Taxation Aspects of Corporate Finance', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 443-466.
- Alstott, Anne L. and Mackie, James B. (1992), 'Approaches to Corporate Integration: The Treasury Department Report' Ph.D. Dissertation, *45 National Tax Journal*, 209-223.
- Altshuler, Rosanne T. and Auerbach, Alan J. (1990), 'The Importance of Tax Law Asymmetries: An Empirical Investigation', *105 Quarterly Journal of Economics*, 61-86.
- Altshuler, Rosanne T. and Mintz, Jack M. (1995), 'United States Interest-Allocation Rules: Effects and Policy', in Giovannini, A., Hubbard, R.G. and Slemrod, J. (eds), *Studies in International Taxation*, Chicago, University of Chicago Press.
- Altshuler, Rosanne T. and Newlon, T. Scott (1993), 'The Effects of U.S. Tax Policy on the Income Repatriation Patterns of U.S. Multinational Corporations', in Giovannini, A., Hubbard, R.G. and Slemrod, J. (eds), *Studies in International Taxation*, Chicago: University of Chicago Press, 77-115.
- Altshuler, Rosanne T., Newlon, T. Scott and Randolph, William C. (1995), 'Do Repatriation Taxes Matter? Evidence from the Tax Returns of U.S. Multinationals', in Feldstein, M. (ed.), *The Effects of Taxation on Capital Accumulation*, Chicago: University of Chicago Press, 253-276.
- Alworth, J.S. (ed.) (1988), 'Investment and Taxation Decisions of Multinationals', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.

- Alworth, J.S. (ed.) (1988), *The Finance, Investment and Taxation Decisions of Multinationals*.
- American Bar Association (ed.) (1988), *A Report of the Invitational Conference on Subchapter C*.
- American Institute of Certified Public Accountants (ed.) (1993), *Integration of the Corporate and Shareholder Tax Systems*, New York.
- American Law Institute (1991), 'Federal Income Tax Project, Integration of the Individual and Corporate Income Taxes', **2** *Reporter's Memorandum*.
- American Law Institute (ed.) (1979), *Federal Tax Project, Tentative Draft No. 2, Subchapter C - Corporate Distributions*, Philadelphia, The American Law Institute.
- American Law Institute (ed.) (1982), *Federal Income Tax Project, Subchapter C: Proposals on Corporate Acquisitions and Dispositions and Reporter's Study on Corporate Distributions*, Philadelphia, The American Law Institute.
- American Law Institute (ed.) (1989), *Federal Income Tax Project, Subchapter C, Reporter's Study Draft (Supplemental Study)*, Philadelphia, The American Law Institute.
- American Law Institute (ed.) (1990), *Federal Income Tax Project, Integration of the Individual and Corporate Income Taxes, Reporter's Memorandum No. 1*, Philadelphia, The American Law Institute.
- American Law Institute (ed.) (1991), *Federal Income Tax Project Integration of the Individual and Corporate Income Taxes, Reporter's Memorandum No. 3*, Philadelphia, The American Law Institute.
- American Law Institute (ed.) (1992), *Federal Income Tax Project, Integration of the Individual and Corporate Income Taxes, Reporter's Study of Corporate Tax Integration*, Philadelphia, The American Law Institute.
- Amihud, Yakov and Murgia, Maurizio (1997), 'Dividends, Taxes, and Signaling: Evidence from Germany', **52** *Journal of Finance*, 397-408.
- Anderson, F.J., Beaudreau, B.C. and Bonsor, N.C. (1983), 'Effective Corporate Tax Rates, Inflation, and Contestability', **16(4)** *Canadian Journal of Economics*, 686-703.
- Andersson, Edward (1983), 'Corporate Tax Laws as Instruments of Economic Policy: Some Finnish Experiences', **37(1)** *Bulletin for International Fiscal Documentation*, 35-39.
- Andersson, Krister (1991), 'Taxation and the Cost of Capital in Hungary and Poland: A Comparison with Selected European Countries', **38(2)** *International Monetary Fund Staff Papers*, 327-355.
- Andrews, William D. (1956), 'Out of Earnings and Profits: Some Reflections on the Taxation of Dividends', **69** *Harvard Law Review*, 1403 ff.
- Andrews, William D. (1984), 'Tax Neutrality between Equity and Debt Capital', **30** *Wayne Law Review*, 1057-1071.
- Andrews, William D. (1995), *The Unintegrated Economics of Corporate Tax Integration*.
- Ang, James S. and Peterson, David, 'Optimal Debt Versus Debt Capacity: A Disequilibrium Model of Corporate Behavior', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.

- Appelbaum, Elie and Katz, Eliakim (1996), 'Corporate Taxation, Incumbency Advantage and Entry', **40** *European Economic Review*, 1817-1828.
- Arbor, Ann (1992), 'Tax Compliance and Enforcement', in Slemrod, Joel (ed.), *Why People Pay Taxes: Tax Compliance and Enforcement*, University of Michigan Press, 125-661.
- Aretz, Adward (1991), 'Taxation and Incorporation: An Economic Analysis of Post-1992 Business Incorporations', in Weigel, Wolfgang (ed.), *Economic Analysis of Law - A Collection of Applications*, Vienna, Österreichischer Wirtschaftsverlag, 122-132.
- Arlen, Jennifer H. and Weiss, Deborah M. (1995), 'A Political Theory of Corporate Taxation', **105** *Yale Law Journal*, 325 ff.
- Arnold, Brian J. (1994), 'Canadian Finance Minister Announces Release of Tax Expenditures Account: Corporate Tax Expenditures Detailed', **8** *Tax Notes International*, 841 ff.
- Auerbach, Alan J. (1979a), 'Wealth Maximization and the Cost of Capital', **93** *Quarterly Journal of Economics*, 443-446.
- Auerbach, Alan J. (1979b), 'Share Valuation and Corporate Equity Policy', **11** *Journal of Public Economics*, 291-305.
- Auerbach, Alan J. (1981a), 'Inflation and the Tax Treatment of Firm Behavior', *American Economic Review*, 419-423.
- Auerbach, Alan J. (1981b), *Tax Integration and the New View of the Corporate Tax: a 1980 Perspective*.
- Auerbach, Alan J. (1982a), 'The New Economics of Accelerated Depreciation', **23** *Boston College Law Review*, 1327-1355.
- Auerbach, Alan J. (1982b), 'Whither the Corporate Tax? Reform after ACRS', **35(3)** *National Tax Journal*, 275-286.
- Auerbach, Alan J. (1983a), 'Stockholder Tax Rates and Firm Attributes', **21** *Journal of Public Economics*, 107 ff.
- Auerbach, Alan J. (1983b), 'Taxation, Corporate Financial Policy, and the Cost of Capital', **21** *Journal of Economic Literature*, 905-940.
- Auerbach, Alan J. (1983c), 'Corporate Taxation in the United States', **2** *Brookings Papers on Economic Activity*, 451-505.
- Auerbach, Alan J. (1984), 'Taxes, Firm Financial Policy and the Cost of Capital: An Empirical Analysis', **23** *Journal of Public Economics*, 27-57.
- Auerbach, Alan J. (1985), *Real Determinants of Corporate Leverage*, Chicago, University of Chicago Press.
- Auerbach, Alan J. (1986), 'The Dynamic Effects of Tax Law Asymmetries', **53** *Review of Economic Studies*, 205-226.
- Auerbach, Alan J. (1987), 'The Tax Reform Act of 1986 and the Cost of Capital', **1** *Economic Perspectives*, 73-86.
- Auerbach, Alan J. (1989), 'Implications for Public Policy: Tax Policy and Corporate Borrowing', *Proceedings of a conference held at Melvin Village, New Hampshire* in Kopcke, Richard and Rosengren, Eric (eds), *Are the Distinctions between Debt and Equity disappearing ?*, Federal Reserve Bank of Boston.
- Auerbach, Alan J. (1998), 'Should Interest Deductions be Limited?', in Aaron, Henry J., Galper, Harveu and Pechman, Joseph A. (eds), *Uneasy Compromise: Problems of a Hybrid Income-Consumption Tax*, Washington, Brookings Institution.

- Auerbach, Alan J. and King, Mervyn (1983), 'Taxation, Portfolio Choice and Debt Equity Ratios: a General Equilibrium Model', *Quarterly Journal of Economics*, 587-609.
- Auerbach, Alan J. and Poterba, James M. (1987a), 'Why Have Corporate Revenues Declined?', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 3-29.
- Auerbach, Alan J. and Poterba, James M. (1987b), 'Tax Loss Carryforwards and Corporate Tax Incentives', in Feldstein, M. (ed.), *The Effects of Taxation on Capital Accumulation*, Chicago: University of Chicago Press.
- Auerbach, Alan J. and Reishus, David (1988), 'The Impact of Taxation on Mergers and Acquisitions', **69** in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 81 ff.
- Auerbach, Alan J. and Reishus, David (1988), 'The Effects of Taxation on the Merger Decision', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Auerbach, Alan J. and Reishus, David (1988), 'Taxes and the Merger Decision', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Auerbach, Alan J. and Hassett, Kevin A. (1992), 'Tax Policy and Business Fixed Investment in the United States', **47** *Journal of Public Economics*, 141-170.
- Auerbach, Alan J., Hassett, Kevin A. and Sodersten, Jan (1995), 'Taxation and Corporate Investment: The Impact of the 1991 Swedish Tax Reform', **2** *Swedish Economic Policy Review*, 361-383.
- Auerbach, Alan J. and Slemrod, Joel (1997), 'The Economic Effects of the Tax Reform Act of 1986', **35** *Journal of Economic Literature*, 589-632.
- Ault, Hugh J. (1978), 'International Issues in Corporate Tax Integration', **10** *Law and Policy in International Business*, 461 ff.
- Ault, Hugh J. (1980), 'Exploration of Income Tax Treaty Policy Issues in the United States: Interaction of the U. S. Tax System and U.S. Tax Treaty Rules with Foreign Integrated Corporate Shareholder Tax Systems', **34(23)** *Bulletin for International Fiscal Documentation*, 62-64.
- Ault, Hugh J. (1992), 'Corporate Integration, Tax Treaties and the Division of the International Tax Base: Principles and Practices, with commentary by Kees Van Raad', **47** *Tax Law Review*, 565 ff.
- Ault, Hugh J. (ed.) (1997), *Comparative Income Taxation: A Structural Analysis*, Kluwer Law International.
- Ault, Hugh J. and Bradford, David F. (1990), 'Taxing International Income: An Analysis of the U.S. System and its Economic Premises', in Razin and Slemrod (eds), *Taxation in the Global Economy*, Chicago: University of Chicago Press, 11 ff.
- Avi-Yonah, R. S. and Reuven, S. (1990), 'The Treatment of Corporate Preference Items under an Integrated Tax System: a Comparative Analysis', **44** *Tax Lawyer*, 195 ff.
- Avi-Yonah, R. S. and Reuven, S. (1995), 'The Rise and Fall of Arms' Length: A Study in the Evolution of U.S. International Taxation', **15** *Va. Tax Review*, 89 ff.

- Ayers, Benjamin, Robinson, John R. and Cloyd, Bryan C. (1996), 'Organizational Form and Taxes: An Empirical Analysis of Small Businesses', *Journal of the American Taxation Association*, 49-67.
- Bacon, Frank W., Shin, Tai S. and Murphy, Neil B. (1994), 'Factors Motivating Mergers: The Case of Rural Electric Cooperatives', **46(2)** *Journal of Economics and Business*, 129-134.
- Bagwell, Laurie Simon and Shoven, John B. (1989), 'Cash Distributions to Shareholders', **3** *Journal of Economic Perspectives*, 129-140.
- Ballard, Billy L. (ed.), *Corporate Tax Rates and the Purchasing Power Parity Doctrine: Thesis (M.S.)*, University of North Texas.
- Ballard, Charles L., Fullerton, Don, Shoven, John B. and Walley, A. (eds) (1985), *A General Equilibrium Model for Tax Policy Evaluation*, Chicago.
- Ballentine, J. Gregory (1980), 'Sales Maximization and Corporate Tax Shifting', **47(2)** *Southern Economic Journal*, 498-501.
- Ballentine, J. Gregory (1986), *Effective Corporate Tax Rates: Their Level and Dispersion Across Industries*.
- Bamberg, Gunter and Roder, Klaus (1994), 'Arbitrage institutioneller Anleger am DAX Futures Markt unter Berücksichtigung von Körperschaftsteuern und Dividenden. (With English summary)', **64(12)** *Zeitschrift für Betriebswirtschaft*, 1533-1566.
- Bankman, Joseph (1995), 'A Market-Value Based Corporate Income Tax', **68** *Tax Notes*, 1347 ff.
- Barclay, Michael J., Smith, C.W. and Watts, Ross L. (1995), 'The Determinants of Corporate Leverage and Dividends Policies', **7** *Journal of Applied Corporate Finance*, 4-19.
- Barnes, Tom and Burnie, David A. (1987), 'The Estimation of Corporate Bond Yield Curves as a Function of Term to Maturity and Coupon', **26(4)** *Quarterly Journal of Business and Economics*, 50-64.
- Bartholdy, J., Fisher, G. and Mintz, Jack M. (1985), *Some Theory of Taxation and Financial Policy with Application to Canadian Corporate Data*, Econometric Society Fifth World Congress, Cambridge.
- Battacharya, Sugato (1980), 'Imperfect Information, Dividend Policy and the "Bird in the Hand Fallacy"', **10** *Bell Journal of Economics*, 259-270.
- Batten, Dallas S. and Ott, Mack (1985), 'The President's Proposed Corporate Tax Reforms: A Move toward Tax Neutrality', **67(7)** *Federal Reserve Bank of St. Louis Review*, 5-17.
- Benge, Matt (1997a), *The Australian Full Imputation Reform in Company Tax Systems*.
- Benge, Matt (1997b), 'Taxes, Corporate Financial Policy and Investment Decisions in Australia', **73** *Economic Record*, 1-15.
- Benge, Matt and Robinson, Tim (eds) (1986), *How to Integrate Company and Shareholder Taxation: Why Full Imputation is the Best Answer*, Wellington University Press for the Institute of Policy Studies.
- Bernard, Jean Thomas and Weiner, Robert J. (eds) (1990), 'Multinational Corporations, Transfer Prices, and Taxes: Evidence from the U.S. Petroleum Industry', in Razin and Slemrod (eds), *Taxation in the Global Economy*, Chicago, University of Chicago Press.
- Bernard, Victor L. and Hayn, Carla (1986), 'Inflation and the Distribution of the Corporate Income Tax Burden', **39** *National Tax Journal*, 171-187.

- Bernheim, B. Douglas (1991), 'Tax Policy and The Dividend Puzzle', *22 Rand Journal of Economics*, 455-476.
- Bernheim, B. Douglas and Shoven, John B. (1987), 'Taxation and the Cost of Capital: An International Comparison', *61*, 74-75.
- Bernheim, B. Douglas and Wantz, Adam (1995), 'A Tax-Based Test of the Dividend Signalling Hypothesis', *85 American Economic Review*, 532-551.
- Bernstein, Jeffrey I. and Nadiri, M., *Corporate Taxes and Incentives and the Structure of Production: a Selected Survey*, Kingston, Ontario.
- Bernstein, Jeffrey I. and Shah, Anwar (1993), *Corporate Tax Structure and Production*, World Bank Policy Research Dept., 1196.
- Berry, Richard J. (ed.) (1978), *Short-run Shifting and Incidence of the Corporate Income Tax for U.S. Manufacturing*.
- Bird, Richard M. (ed.) (1980), *Taxing Corporations*, Montreal, Institute for Research on Public Policy.
- Bird, Richard M. (1987), 'Corporate-Personal Tax Integration', in Cnossen, S. (ed.), *Tax Coordination In The European Community*, London: Kluwer Law And Taxation, 227 ff.
- Bird, Richard M. (1996), *Why Tax Corporations?*, Ottawa, Technical Committee on Business Taxation., 96-2.
- Bittker, Boris I. and Rahdert (1976), 'The Exemption of Nonprofit Organizations from Federal Income Taxation', *85 Yale Law Journal*, 299 ff.
- Bittker, Boris I., Eustice, James S. and Cummings, Jasper L., Jr (1994), *Federal Income Taxation of Corporations and Shareholders*.
- Blair, Margaret, M. and Litan Robert (1990), 'Corporate Leverage and Leveraged Buyouts in the Eighties: Taxes, Debt, and Corporate Restructuring', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Blais, Andre and Vaillancourt, Francois (1986), *The Political Economy of Taxation: the Corporate Income Tax and the Canadian Manufacturing Industry*, Dept. De Science Economique, Universite de Montreal, 8610.
- Blum, Walter J. (1975), 'The Earnings and Profits Limitation on Dividend Income: A Reappraisal', *53 Taxes*, 68 ff.
- Blumenthal, Marsha and Slemrod, Joel (1994), *The Compliance Costs of the US Corporate Income Tax for Large Corporations*.
- Blumenthal, Marsha and Slemrod, Joel (1995), 'The Compliance Cost of Taxing Foreign-Source Income: Its Magnitude, Determinants and Policy Implications', *International Tax and Public Finance* in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press. Slemrod J. (ed.), *The taxation of multinational corporations* (1996)
- Boadway, Robin W. (1988), 'The Theory and Measurement of Effective Tax Rates', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 60-98.
- Boadway, Robin W. (1989), 'Corporate Tax Harmonisation: Lessons from Canada in Gammie, Malcolm, Robinson, Bill, and Fitchew, Geoffrey, Beyond 1992: a European Tax System', in

- Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Boadway, Robin W. and Bruce, Neil (1984), 'A General Proposition on the Design of a Neutral Business Tax', **24** *Journal of Public Economics*, 231-239.
- Boadway, Robin W. and Bruce, Neil (1992a), 'Problems with Integrating Corporate and Personal Income Taxes in an Open Economy', **24** *Journal of Public Economics*, 231-239.
- Boadway, Robin W. and Bruce, Neil (1992b), 'Problems with Integrating Corporate and Personal Income Taxes in an Open Economy', **48(1)** *Journal of Public Economics*, 39-66.
- Boadway, Robin W. and Treddenick, John M. (1975a), *The Effects of the U.S. Corporate Tax on Resource Allocation and Welfare Institute for Economic Research*, Queen's University Institute for Economic Research Discussino Paper, 165.
- Boadway, Robin W. and Treddenick, John M. (1975b), 'The Effect of Corporate Tax Changes by Industry on Employment in Canada: A Short Run Analysis', **30(1)** *Public Finance*, 46-60.
- Boadway, Robin, Bruce, Neil and Mintz, Jack M. (1982), 'Corporate Taxation in Canada: Toward an Efficient System', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Boadway, Robin, Bruce, Neil and Mintz, Jack M. (1984), 'Taxation, Inflation, and the Effective Marginal Tax Rate in Canada', **17** *Canadian Journal of Economics*, 62-79.
- Boadway, Robin, Bruce, Neil and Mintz, Jack M. (1992), 'Corporate Taxation and the Holding of Inventories', **25** *Canadian Journal of Economics*, 278-293.
- Bodie, Zvi (1989), 'The Lender's View of Debt and Equity: the Case of Pension Funds', Proceedings of a conference held at Melvin Village, New Hampshire.
- Bolderson, Sarah and Huiskes, Theodoor (1994), 'Central and Eastern Europe: Meeting Tax Obligations in Central and Eastern Europe', **48** *Bulletin for International Fiscal Documentation*, 648-654.
- Bond, S. and Devereux, Michael P. (1995), 'On the Design of a Neutral Business Tax under Uncertainty', **58** *Journal of Public Economics*, 57-71.
- Bonner, Sarah E., Davis, Jon S. and Jackson, Betty R. (1992), 'Expertise in Corporate Tax Planning: The Issue Identification Stage', **30(0)** *Journal of Accounting Research*, 1-28.
- Boshoff, Vanessa (1993), 'Corporate Tax Rates and Inter-country Comparisons', **61(4)** *South African Journal of Economics*, 301-316.
- Bovenberg, A. Lans (1993), 'Investment Promoting Policies in Open Economies: The Importance of Intergenerational and International Distributional Effects', **51(1)** *Journal of Public Economics*, 3-54.
- Bovenberg, A. Lans and Goulder, Lawrence H. (1993), 'Promoting Investment under International Capital Mobility: An Intertemporal General Equilibrium Analysis', **95(2)** *Scandinavian Journal of Economics*, 133-156.
- Boyle, Glenn W. (1996), 'Corporate Investment and Dividend Tax Imputation', **31** *Financial Review*, 209-226.
- Boynton, Charles E., Dobbins, Paul S. and Plesko, George A. (1992), 'Earnings Management and the Corporate Alternative Minimum Tax in Conference on Accounting Research', *Studies on Accounting and Taxation*.

- Bracewell-Milnes, J. Barry (1995), 'Summary of Proceedings in International Fiscal Association. International Taxation of Dividends Reconsidered in Light of Corporate Tax Integration', Proceedings of a seminar organised jointly with the EOCED in Toronto in 1994 during the 48th Congress of the International Fiscal Association.
- Bradford, David F. (1981), 'The Incidence and Allocation Effects of a Tax on Corporate Distributions', **15** *Journal of Public Economics*, 1-22.
- Bradford, David F. and Fullerton, David J. (1982), 'Pitfalls in the Construction and Use of Effective Tax Rates', in Hulten, Charles R. (ed.), *Depreciation, Inflation, and the Taxation of Income from Capital*, Washington, Urban Institute, 251-279.
- Bradford, David F. and Gordon, Roger H. (1980), 'Taxation and the Stock Market Valuation of Capital Gains and Dividends', **14** *Journal of Public Economics*, 109-136.
- Bradley, Cassie Francis (ed.) (1994), *An Empirical Investigation of Factors Affecting Corporate Tax Compliance Behavior: Ph.D. Thesis*, University of Alabama, Culverhouse School of Accountancy.
- Bradley, Michael, Jarrell, Gregg A. and Kim, E. Han (1984), 'On the Existence of an Optimal Capital Structure: Theory and Evidence', **39** *The Journal of Finance*, 857 ff.
- Bravenec, Lorence L. (1989), 'A Nontraditional Approach to Corporate Integration', *Tax Notes*, 1381 ff.
- Break, George F. (1969), 'Integrating Corporate and Personal Income Taxes: The Carter Commission Proposals', **34** *Law and Contemporary Problems*, 726-735.
- Break, George F. (1969), 'Integration of the Corporate and Personal Income Taxes', **22** *National Tax Journal*, 39-56.
- Break, George F. (1978), 'Corporate Tax Integration: Radical Revisions or Common Sense?', in Boskin, Michael J. (ed.), *Federal Tax Reform Myths and Realities*, San Francisco, Institute for Contemporary Studies Press.
- Break, George F. (1991), 'Corporate Income Taxation in Jamaica: A Framework for Policy Formation', in Bahl, Roy (ed.), *The Jamaican Tax Reform*, Cambridge, MA, Lincoln Institute of Land Policy, 251-263.
- Break, George F. and Pechman, Joseph A. (1975), 'Relationship Between the Corporation and Individual Income Taxes', **28** *National Tax Journal*, 341 ff.
- Brennan, Michael J. (1970), 'Taxes, Market Valuation and Corporate Financial Policy', **23** *National Tax Journal*, 417-427.
- Brittain, John A. (1964), 'The Tax Structure and Corporate Dividend Policy', **54** *American Economic Review*, 272 ff. Reprinted by Brookings Institution, Washington, DC Studies of Government Finance reprint no. 78.
- Brittain, John A. (ed.) (1966), *Corporate Dividend Policy*, Washington, Brookings Institution.
- Brody, Evelyn (1995), 'Agents Without Principals: the Economic Convergence of the Nonprofit and For-Profit Organizational Forms', **40** *New York Law School Law Review*, 457 ff.
- Brooke, Peter (1989), 'The Government's Approach to the Community: Some Myths Dispelled', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Brooks, Janet (1990), 'Tax Reform: A Response to Economic and Social Changes: Korea', **44(6)** *Bulletin for International Fiscal Documentation*, 271-272.

- Brooks, Neil (1997), 'Canadian Corporate Tax: Logic, Policies and Politics', in Head, G. And Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 115-158.
- Brown, E. (1973), *Cary Recent Studies of the Incidence of the Corporate Income Tax*, Massachusetts Institute of Technology Dept. of Economics Working paper No. 116.
- Brown, Fred B. (1993), 'Federal Income Taxation of U.S. Branches of Foreign Corporations: Separate Entity or Separate Rules?', **49** *Tax Law Review*, 195-196.
- Brumbaugh, David L. and Gravelle, Jane G. (ed.) (1984), *The Corporate Income Tax and the U.S. Economy*, Washington DC, Congressional Research Service, Library of Congress.
- Bryan (1984), 'Cancellation of Indebtedness by Issuing Stock in Exchange, Challenging the Congressional Solution to Debt-Equity Swaps', **63** *Texas Law Review*, 89-130.
- Bryan (1987), 'Leveraged Buyouts and Tax Policy', **65** *North Carolina Law Review*, 1039 ff.
- Buck, Ingerlise (1990), 'Budgetdepartmentets Behandling af Erhvervsbeskatningen (with English summary) (A Critical Evaluation of the Assumptions on Corporate Tax in the Macroeconomic Model Used by the Danish Ministry of Finance)', **128(1)** *Nationaløkonomisk Tidsskrift*, 30-39.
- Bulow, Jeremy I. and Summers, Lawrence H. (1984), 'The Taxation of Risky Assets', **92** *Journal of Political Economy*, 20-39.
- Bulow, Jeremy I., Summers, Lawrence H. and Summers, Victoria P. (1990), 'Distinguishing Debt from Equity in the Junk Bond Era', in Shoven, John B. and Waldfogel, Joel (eds), *In Debt, Taxes, and Corporate Restructuring*, Washington, Brookings Institution.
- Burke, Karen C. (1995), 'The Uncertain Future of Limited Liability Companies', **12** *American Journal of Tax Policy*, 14 ff.
- Burns, Arthur Edward (1970), 'The Tax Court and Profit Renegotiation', **13** *Journal of Law and Economics*, 307-326.
- Butters, J. Keith, Lintner, John V. and Cary, William L. (1951), *Effects of Taxation on Corporate Mergers*.
- Canellos, Peter C. (1985), 'The Over-Leveraged Acquisition', **39** *Tax Lawyer*, 91 ff.
- Canellos, Peter C. (1987), 'Corporate Tax Integration: by Design or by Default', *Tax Notes*, 999 ff.
- Canellos, Peter C. (1988), 'Corporate Tax Integration: by Design or by Default?', in Yin, George K. and Mundstock, George (eds), *Corporate Tax Reform: A Report of the Invitational Conference on Subchapter C 129*.
- Canellos, Peter C. and Yin, George K. (eds) (1987), *Corporate Tax Reform: A Report of the American Bar and New York State Bar Associations Invitational Conference on Subchapter C*.
- Caplin, Mortimer M. (1961), 'Income Tax Pressures on the Form of Business Organization: Is it Time for a "Doing Business" Tax?', **47** *Va. Law Review*, 249 ff.
- Carrera, Carmen (1991), 'On the Consequences of Legal Constraints and Taxation for Corporate Choice', **24** *Canadian Journal of Economics*, 471-485.
- Carter, Mary Ellen and Manzon, Gil B., Jr (1995), 'Evidence on the Role of Taxes on Financing Choice: Consideration of Mandatorily Redeemable Preferred Stock', **18** *Journal of Financial Research*, 103-114.

- Cary, William L. (1974), 'Federalism and Corporate Law: Reflections Upon Delaware', **83** *Yale Law Journal*, 663 ff.
- Centre for European Policy Studies (ed.) (1992), *Corporate Tax Harmonisation in the European Community*.
- Chen, Charng Yi and Ponarul, Richard (1991), 'Tax Sheltering Behavior of Property Liability Insurers: Some Additional Evidence', **58(4)** *Journal of Risk and Insurance*, 722-728.
- Cheung, Joseph K. (1987), 'Depreciation, Debt, and Equilibrium Tax Rates: A Reconsideration', **27(1)** *Quarterly Review of Economics and Business*, 6-15.
- Chiang, Raymond C. and Narayanan, M.P. (1991), 'Bond Refunding in Efficient Markets: A Dynamic Analysis with Tax Effects', **14(4)** *Journal of Financial Research*, 287-302.
- Chirelstein, Marvin A. (1969), 'Optional Redemptions and Optional Dividends: Taxing the Repurchase of Common Shares', **78** *Yale Law Journal*, 739 ff.
- Chirinko, Robert S. (1986), 'Business Investment and Tax Policy: a Perspective on Existing Models and Empirical Results', **39** *National Tax Journal*, 137 ff.
- Chirinko, Robert S. (1987), 'The Ineffectiveness of Effective Tax Rates on Business Investment: a Critique of Feldstein's Fisher-Schultz Lecture', **32** *Journal of Public Economics*, 369 ff.
- Chirinko, Robert S. (ed.), *Business Fixed Investment Spending: A Critical Survey of Modeling Strategies, Empirical Results, and Policy Implications*, University of Munich, Centre for Economic Studies, 27.
- Chorvat, Terrence R. (1998), 'Taxing International Corporate Income Efficiently', *Tax Law Review*.
- Chown, John (1989), 'Tax Harmonisation in Europe', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Christie, William G. and Nanda, Vikram (1994), 'Free Cash Flow, Shareholder Value, and the Undistributed Profits Tax of 1936 and 1937', **49** *Journal of Finance*, 1727-1754.
- Citizens for Tax Justice (1985), 'Corporate Taxpayers and Corporate Freeloaders: Four Years of Continuing, Legalized Tax Avoidance by America's Largest Corporation, 1981-84', *Tax Notes*, 947-971.
- Clark (1975), 'The Federal Income Taxation of Financial Intermediaries', **84** *Yale Law Journal*, 1603 ff.
- Clark, Robert C. (1977), 'The Morphogenesis of Subchapter C: An Essay in Statutory Evolution and Reform', **87** *Yale Law Journal*, 90 ff.
- Clotfelter, Charles T. (1989), 'Tax-Induced Distortions in the Voluntary Sector: in What is Charity? Implications for Law and Policy', **39** *Case Western Reserve Law Review*, 663 ff.
- Clowery, Grant M., Outslay, Edmund and Wheeler, James, E. (1986), 'The Debate on Computing Corporate Effective Tax Rates - an Accounting View', *Tax Notes*.
- Cloyd, Bryan C., Limberg, Stephen T. and Robinson, John R. (1997), 'The Impact of Federal Taxes on the Use of Debt by Closely-Held Corporations', *National Tax Journal*, 261-277.
- Crossen, Sijbren (1989), 'How Much Tax Harmonisation in the European Community?', in Gammie, Malcolm, Robinson, Bill and Fitchew, Geoffrey, *Beyond 1992: A European Tax*

- System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Cnossen, Sijbren (1993), 'What Kind of Corporation Tax?', **47** *International Bureau of Fiscal Documentation*, 3-16.
- Cnossen, Sijbren (1993), 'Must the Corporation Tax be Harmonised?', in Knoester, Anthonie (ed.), *Taxation in the United States and Europe: Theory and Practice: Proceedings of a Conference Held by the Confederation of European Economic Associations at Amsterdam, the Netherlands, 1991*, 165-201. Confederation of European Economic Associations Conference Volumes 1993.
- Cnossen, Sijbren (1996), 'Company Taxes in the European Union: Criteria and Options for Reform', **17** *Fiscal Studies*, 67-97.
- Cnossen, Sijbren (1997a), 'Reform and Harmonization of Company Tax Systems in the European Union', in , *Tax Conversations: A Guide to the Key Issues in the Tax Reform Debate: Essays in Honour of John G. Head*, Kluwer, 365-413.
- Cnossen, Sijbren (1997b), 'The Role of the Corporation Tax in OECD Member Countries', in Head, G. And Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 49-84.
- Coates, Dennis (1991), 'Endogenous Capital Utilization and Taxation of Corporate Capital', **44** *National Tax Journal*, 79-91.
- Cohen, Edwin S. (1975), 'Possible Solutions to Practical Problems in Integration of the Corporate and Shareholder Income Tax', **28** *National Tax Journal*, 359-367.
- Cohen, Edwin S., Warren, Alvin C. and Andrews, William D. (1985), 'The Meaning of Changes Within the Framework of Subchapter C and the Impact on Proposals for Integration of the Corporate and Individual Income Tax', **22** *San Diego Law Review*, 317 ff.
- Collins, Julie H. and Shackelford, Douglas A. (1990), 'Corporate Domicile and Average Effective Tax Rates: The Cases of Canada, Japan, the United Kingdom, and the United States', in Slemrod, Joel (ed.), *The Taxation of Multinational Corporations*.
- Collins, Julie H. and Shackelford, Douglas A. (1992a), 'Foreign Tax Credit Limitations and Preferred Stock Issuances', **30** *Journal of Accounting Research*, 103-124.
- Collins, Julie H. and Shackelford, Douglas A. (eds) (1992b), *Foreign Tax Credit Limitations and Preferred Stock Issuances in Conference on Accounting Research, Studies on Accounting and Taxation*, Chicago, University of Chicago.
- Collins, Julie H., Kelmsley, D. and Shackelford, Douglas A. (1995), 'Tax Reform and Foreign Acquisitions: A Microanalysis', **48** *National Tax Journal*, 1-21.
- Colm, Gerhard (1940), 'Conflicting Theories of Corporate Income Taxation', **7** *Law and Contemporary Problems*, 282 ff.
- Commission on Corporations (1977), 'Report on the Integration of Corporate and Individual Income Taxes', **31** *Tax Lawyer*, 37 ff.
- Commission of European Communities (ed.) (1992), *Report of the Committee of Independent Experts on Company Taxation*, Brussels.
- Cooley, Thomas F. and Salyer, Kevin D. (1987), 'The Effects of Inflation Induced Tax Increases on Stock and Housing Prices', **89(4)** *Scandinavian Journal of Economics*, 421-434.
- Cooper, Graeme S. (1994), 'Analyzing Corporate Tax Evasion', **50** *Tax Law Review*, 33 ff.

- Cooper, Graeme S. (1996), 'The Return to Corporate Tax Evasion in the Presence of an Income Tax on Shareholders: The Return to Corporate Tax Evasion in the Presence of an Income Tax on Shareholders', *12 Akron Tax Journal*, 1 ff.
- Cooper, Graeme S. (1997), 'The Effect of an Income Tax on Corporate Tax Compliance', in Head, G. And Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 341-378.
- Cooper, Graeme S. and Gordon, Richard K., Jr (1988), 'Taxation of Legal Persons and Their Owners', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Cordes, Joseph J. and Sheffrin, Steven M. (1983), 'Estimating the Tax Advantage of Corporate Debt', *38 Journal of Finance*, 95-105.
- Cosciani, Cesare (1959), *The Effects of Differential Tax Treatment of Corporate and Non-corporate Enterprises*, European Productivity Agency of the Organisation for European Economic Cooperation Project, 314.
- Couzin, Robert (1992), 'Taxation and Its Impact on Market Structure: Comment', in Bird, R.M. and Mintz, J.M. (eds), *Taxation to 2000 and Beyond. Canadian Tax Paper*, Toronto: Canadian Tax Foundation, 257-262.
- Coyne, Christopher, Fabozzi, Frank J. and Yaari, M.E. (1992), 'How Taxes Transform Corporate Acquisitions into Asset Arbitrage', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 173-203.
- Cragg, John C., Harberger, Arnold, C. and Mieszkowski, Peter M. (1967), 'Empirical Evidence on the Incidence of the Corporation Income Tax', *Journal of Political Economy*, 811-822. Reprinted in Harberger, Arnold C. (ed.) *Taxation and Welfare*, 1974, 135-162
- Craig, Caroline Kern (ed.) (1987), *The Shifting of Corporate Capital Acquisition Tax Subsidies an Empirical Analysis, Ph.D. Thesis*, University of Illinois at Urbana-Champaign.
- Craig, Caroline Kern and Todd, Heidi I. (1993), 'An Overview of Corporate Tax Issues Involving the European Community', *175 Journal of Accountancy*, 29 ff.
- Crane, Charlotte (1988), 'Toward a Theory of the Corporate Tax Base: The Effect of a Corporate Distribution of Encumbered Property to Shareholders', *44 Tax Law Review*, 13 ff.
- Crockett, Ulysses S. (ed.) (1973), *Tax Exemption for Corporate Mergers and Consolidations: a Legislative History of Congressional Policy, LL.M. Thesis*, Columbia University Press.
- Cross, Mark L., Davidson, Wallace N. II and Thornton, John H. (1988), 'Taxes, Stock Returns and Captive Insurance Subsidiaries', *55 Journal of Risk and Insurance*, 331-338.
- Cummings, Jasper L., Jr (1992), 'The Silent Policies of Conservation and Cloning of Tax Basis and Their Corporate Applications', *48 Tax Law Review*, 126-131.
- Cummins, Jason G., Harris, Trevor S. and Hassett, Kevin A. (1995), 'Accounting Standards, Information Flow, and Firm Investment Behavior', in Feldstein, M., Hines, J.R., Jr, Hubbard, R.G. (eds), *The Effects of Taxation on Multinational Corporations*, Chicago, University of Chicago Press, 181-224.

- Cutler, David M. (1988), 'Tax Reform and the Stock Market: An Asset Price Approach', **78** *American Economic Review*, 1107-1117.
- Daly, Kevin and Hart, Neil (1994), 'Mark-up Pricing and the Forward Shifting of the Corporate Income Tax', **0** *Australian Economic Review*, 45-54.
- Daly, Michael and Jung, Jack (1987), 'The Taxation of Corporate Investment Income in Canada: An Analysis of Marginal Effective Tax Rates', **20** *Canadian Journal of Economics*, 555-587.
- Daly, Michael and Weiner, Joann (1993), 'Corporate Tax Harmonization and Competition in Federal Countries: Some Lessons for the European Community?', **46(4)** *National Tax Journal*, 441-461.
- Dammon, Robert M. and Senbet, Lemma W. (1988), 'The Effect of Taxes and Depreciation on Corporate Investment and Financial Leverage', **43(2)** *Journal of Finance*, 357-373.
- Damus, Sylvester, Hobson, Paul A.R. and Thirsk, Wayne R. (1991), 'Foreign Tax Credits, the Supply of Foreign Capital, and Tax Exporting: A Numerical General Equilibrium Model of Corporate Tax Reform in Canada', **45(1)** *Journal of Public Economics*, 29-46.
- Darrow, Jill E. (1994), 'Limited Liability Companies and S Corporations: Deciding Which is Optimal and Whether to Convert to LLC Status', **48** *Tax Lawyer*, 1 ff.
- Davies, John H. (1975), 'Public Stock, Private Stock: A Model for the Corporate Income Tax', **124** *University of Pennsylvania Law Review*, 299 ff.
- de la Fuente, Angel and Gardner, Edward (eds) (1990), *Corporate Income Tax Harmonization and Capital Allocation in the European Community*, International Monetary Fund.
- Deangelo, Harry (1991), 'Payout Policy and Tax Deferral', **46(1)** *Journal of Finance*, 357-368.
- Deangelo, Harry and Masulis, Ronald W. (1980), 'Optimal Capital Structures under Corporate and Personal Taxation', **8** *Journal of Financial Economics*, 3-30.
- Desai, Mihir A. and Hines, James R., Jr (eds) (1996), "*Basket*" Cases : *International Joint Ventures after the Tax Reform Act of 1986*, National Bureau of Economic Research, 5755.
- Devereux, Michael P. (1989), 'Tax Asymmetries: The Cost of Capital and Investment', **99** *Economic Journal*, 103-112.
- Devereux, Michael P. and Freeman, Harold (1991), 'A General Neutral Profits Tax', **12(3)** *Fiscal Studies*, 2 ff.
- Devereux, Michael P. and Freeman, Harold (1995), 'The Impact of Tax on Foreign Direct Investment: Empirical Evidence and the Implications for Tax Integration Schemes', **2** *International Tax and Public Finance*, 85-106.
- Devereux, Michael P. and Freeman, Harold (1996), 'The Impact of Tax on Foreign Direct Investment: Empirical Evidence and the Implications for Tax Integration Schemes', in Slemrod, Joel (ed.), *The Taxation of Multinational Corporations*. International Tax and Public Finance, 1995
- Devereux, Michael P. and Pearson, Mark (1990), 'Harmonising Corporate Taxes in Europe', **11** *Fiscal Studies*, 21-35.
- Devereux, Michael P. and Pearson, Mark (1992), 'The Interactions of Corporate Tax between the EC, Japan and the United States: International', **46(8)** *Bulletin for International Fiscal Documentation*, 367-383.

- Devereux, Michael P. and Pearson, Mark (1994), 'Production Efficiency and Corporate Tax Harmonization', *European Economic Review*.
- Devereux, Michael P. and Pearson, Mark (eds), *Corporate Tax Harmonisation and Economic Efficiency*.
- Devereux, Michael P., Keen, Michael and Schiantarelli, F. (1994), 'Corporation Tax Asymmetries and Investment: Evidence from UK Panel Data', **53** *Journal of Public Economics*, 3950-3418.
- Diamond, Peter and Mirrlees, J.A. (1971), 'Optimal Taxation and Public Production, I: Production Efficiency, and II: Tax Rules', **61** *American Economic Review*, 261-278.
- Dodge, Joseph A. (1995), 'A Combined Mark-to-Market and Pass-Through Corporate-Shareholder Integration Proposal', **50** *Tax Law Review*, 265 ff.
- Doernberg, Richard L. (1992), 'International Aspects of Individual and Corporate Tax Integration', **4** *Tax Notes International*, 506 ff.
- Doernberg, Richard L. (1995), *Amending the OECD Model Treaty and Commentary in Response to Corporate Tax Integration*, Proceedings of a Seminar Organised Jointly with the OECD in Toronto in 1994 During the 48th Congress of the International Fiscal Association.
- Doernberg, Richard L. and McChesney Fred S. (1987), 'On the Accelerating Rate and Decreasing Durability of Tax Reform', **71** *Minnesota Law Review*, 913 ff.
- Douglas, Richard W., Jr (ed.) (1987), *Consultative Document on Full Imputation*, Wellington, New Zealand Ministry of Finance.
- Douvier, Pierre Jean (1993), 'Major Measures Concerning International Taxation: The Finance Act 1993 and Transfer of Assets Abroad', **47(4)** *Bulletin for International Fiscal Documentation*, 214-219.
- Downs, Thomas, W. (1992), 'Q and the Tax Bias Theory: The Role of Depreciation Tax Shields', **47** *Journal of Public Economics*, 59-84.
- Downs, Thomas, W. (1993), 'Corporate Leverage and Nondebt Tax Shields: Evidence on Crowding-Out', **28** *Financial Review*, 549-583.
- Downs, Thomas, W. and Demingures, Cuneyt (1992), 'The Asset Price Theory of Shareholder Revaluations: Tests with the Tax Reforms of the 1980s', **27** *Financial Review*, 151-184.
- Downs, Thomas and Hendershott, Patric H. (1987), 'Tax Policy and Stock Prices', **40(2)** *National Tax Journal*, 183-190.
- Downs, Thomas, W. and Shriver, Keith A. (1992), 'The Analytical Derivation and Empirical Test of a Tax-Adjusted Fundamental Value Model', **30** *Journal of Accounting Research*, 77-98.
- Downs, Thomas, W. and Tehranian, Hassan (1988), 'Predicting Stock Price Responses to Tax Policy Changes', **78** *American Economic Review*, 1118-1130.
- Driessen, Patrick A. (1991), 'Net Imports and the U.S. Corporate Tax Base', **44(3)** *National Tax Journal*, 315-324.
- Duggal, V.G. and Adams, F.G. (1987), 'Corporate Tax Reform and Business Investment: Empirical Estimates for Structures and Equipment', **12(3)** *Empirical Economics*, 187-195.
- Dusansky, Richard (ed.), *Corporate Income Tax Shifting in the U.S.: A Simultaneous Equations Approach Stony Brook*, Economic Research Bureau, State University of New York, 31.

- Dutton, John (1982), 'The Optimal Taxation of International Investment Income: A Comment', **97** *Quarterly Journal of Economics*, 373-380.
- Dworin, Lowell (1985), 'On Estimating Corporate Tax Liabilities from Financial Statements', **9** *Tax Notes*, 947-971.
- Dworin, Lowell (1987), *Impact of the Corporate Alternative Minimum Tax: A Monte Carlo Simulation*.
- Easson, Alex J. (1997), *Company Tax Reform and the Inter-nation Allocation of Tax Jurisdiction*, Australian Research Foundation.
- Easterbrook, Frank H. (1984), 'Two Agency-cost Explanations of Dividends', **74** *American Economic Review*, 650 ff.
- Easterbrook, Frank H. and Fischel, Daniel R. (1991), *The Economic Structure of Corporate Law*, - Cambridge, MA, Harvard University Press.
- Ebrill, Liam, P. and Hartman, David, G. (1982), 'On the Incidence and Excess Burden of the Corporation Income Tax', **37** *Public Finance*, 48 ff.
- Ebrill, Liam, P. and Hartman, David, G. (1983), 'The Corporate Income Tax, Entrepreneurship, and the Noncorporate Sector', **11** *Public Finance Quarterly*, 419-436.
- Eckhard, Janeba (1995), 'Corporate Income Tax Competition, Double Taxation Treaties, and Foreign Direct Investment', **56** *Journal of Public Economics*, 311-325.
- Eden, Lorraine (ed.) (1998), *Taxing Multinationals: Transfer Pricing and Corporate Income Taxation in North America*, Toronto, University of Toronto Press.
- Egger, John, B. (1985), 'Citizens for Tax Justice's Latest Misrepresentation of Corporate Tax Burdens', *Tax Notes*, 947-971.
- Eisner, Robert (1969), 'Tax Policy and Investment Behavior: Comment', **59** *American Economic Review*, 379 ff.
- Eisner, Robert and Nadiri, M. (1968), 'Investment Behavior and Neoclassical Theory', **50** *Review of Economics and Statistics*, 369 ff.
- Elitzur, R. Ramy and Mintz, Jack M. (1994), 'Transfer Pricing Rules and Corporate Tax Competition. Dept. of Economics and Institute for Policy Analysis', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 829-4909.
- Elitzur, R. Ramy and Mintz, Jack M. (1996), 'Transfer Pricing Rules and Corporate Tax Competition', **60** *Journal of Public Economics*, 401-422.
- Elitzur, R. Ramy and Mintz, Jack M. (1997), 'Corrigendum to Transfer Pricing Rules and Corporate Tax Competition', **64** *Journal of Public Economics*, 287 ff.
- Elston, Julie Ann (1992), 'Tax Reform and Corporate Investment: Theory and Evidence of a Q Theoretic Approach', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Elton, Edwin, J. and Gruber, Martin (1970), 'Marginal Stockholder Tax Rates and the Clientele Effect', **52** *Review of Economics and Statistics*, 68-74.
- Esam, Richard, T. (1979), 'International and Comparative Aspects of Corporate/Shareholder Integration: A View from the United Kingdom', **33** *Bulletin for International Fiscal Documentation*, 312-316.
- Esenwein, Gregg, A. and Gravelle, Jane G. (1982), *A Comparative Analysis of the Accelerated Cost Recovery System and a Repeal of the Corporate Income Tax*, Washington, DC, Fund for Public Policy Research.

- Evans, Thomas L. (1991), 'The Taxation of Multi-Period Projects: An Analysis of Competing Models', **69(5)** *Texas Law Review*, 1109 ff.
- Faber, Peter (1985), 'Taxation of Corporations and Shareholders: Premises of the present System', **22** *San Diego Law Review*, 5 ff.
- Fabozzi, Frank J. and Fonfeder, Robert (1981), 'Corporate Tax Rates in an Inflationary Environment: 1976 and 1977', **16(1)** *Business Economics*, 55-58.
- Fama, Eugene F. and French, Kenneth R. (1998), 'Taxes, Financing Decisions, and Firm Value', *Journal of Finance*.
- Fantozzi, Augusto (1993), 'Italy Welcomes Further EC Harmonization', **47(9)** *Bulletin for International Fiscal Documentation*, 474-479.
- Fazzari, Steven, Hubbard, R. Glenn and Petersen, Bruce (1988), 'Financing Constraints and Corporate Investment', **1** *Brookings Papers on Economic Activity*, 141 ff.
- Feld, Alan (ed.) (1982), *Tax Policy and Corporate Concentration*, Lexington Books.
- Feldstein, Martin S. (1970a), *Testimony on Tax Policy Aspects of Mergers and Acquisitions*, House of Representatives, Committee on Ways and Means, No.101-10.
- Feldstein, Martin, S. (1970b), 'Corporate Taxation and Dividend Behavior', **37** *Review of Economic Studies*, 57-72.
- Feldstein, Martin S. (1972), 'Corporate Taxation and Dividend Behavior: a Reply and Extension', **39** *Review of Economic Studies*, 235 ff.
- Feldstein, Martin S. (1987), *Imputing Corporate Tax Liabilities to Individual Taxpayer*, Cambridge: National Bureau of Economic Research, 2349.
- Feldstein, Martin S. (1988), 'Imputing Corporate Tax Liabilities to Individual Taxpayers', **41(1)** *National Tax Journal*, 37-59.
- Feldstein, Martin S. (1989), 'Tax Policy for the 1990s: Personal Saving, Business Investment, and Corporate Debt', **79** *American Economic Review. Papers and Proceedings*, 108-112.
- Feldstein, Martin S. (1995), 'The Effects of Tax Based Saving Incentives on Government Revenue and National Saving', **110(2)** *Quarterly Journal of Economics*, 475-494.
- Feldstein, Martin S. and Frisch, Daniel, J. (1977a), 'Corporate Tax Integration: the Estimated Effects on Capital Accumulation and Tax Distribution of Two Integration Proposals', **30** *National Tax Journal*, 37 ff.
- Feldstein, Martin S. and Frisch, Daniel, J. (1977b), 'Corporate Tax Integration: The Estimated Effects on Capital Accumulation and Tax Distribution of Two Integration Proposals', **30(1)** *National Tax Journal*, 37-52.
- Feldstein, Martin, S. and Frisch, Daniel, J. (1977c), 'Corporate Tax Integration: A Quantitative Comparison of Alternatives Tax Foundation', **28** *Government Finance Brief*.
- Feldstein, Martin, S. and Slemrod, Joel (1980), 'Personal Taxation, Portfolio Choice, and the Effect of the Corporate Income Tax', **21** *Journal of Political Economy*, 854-866.
- Feltenstein, Andrew and Shah, Anwar (1995), 'General Equilibrium Effects of Investment Incentives in Mexico', **46(2)** *Journal of Development Economics*, 253-269.
- Feldstein, Martin S, Hines, James R., Jr and Hubbard, R. Glenn (eds) (1995), *Taxing Multinational Corporations*.
- Feltham, Glenn, D. and Paquette, Suzanne, M. (1996), *To Pay or to Delay: an Economic Analysis of the Decision to Delay, and the Incidence of Delaying, the Payment of Corporate Income Tax*.

- Fisher (1985), 'Corporate Tax Incentives: The American Version of Industrial Policy', **19** *Journal of Economic Issues*, 9-12.
- Fisher, Peter S. (1985), 'Corporate Tax Incentives: The American Version of Industrial Policy', **19** *Journal of Economic Issues*, 1-19.
- Fitchew, Geoffrey (1989), *The Single European Market and Tax Harmonisation*.
- Flak, Henry (1965), *A Study of the Methods of Shifting the Corporate Income Tax*, Houston University.
- Flemming (1976), 'A Reappraisal of the Corporation Income Tax', **6** *Journal of Public Economics*, 163 ff.
- Fletcher, Douglas, R. (1994), 'The International Argument for Corporate Tax Integration', **11** *American Journal of Tax Policy*, 156 ff.
- Frech, H. Edward III, Deacon, R. Overton, Decanio, Stephen J. and Johnson, Bruce M. (1990), *Taxing Energy: Oil Severance Taxation and the Economy*, New York, Holmes and Meyer.
- Freeman, Louis, S. (1996), *Tax Strategies for Corporate Acquisitions, Dispositions, Spin-offs, Joint Ventures, Financings, Reorganizations and Restructurings*.
- Frisch, Daniel, J. (1990), 'The Economics of International Tax Policy: Some Old and New Approaches', **47** *Tax Notes* in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press, 581 ff.
- From, Gary (ed.) (1971), *Tax Incentives and Capital Spending*.
- Froot, Kenneth A. and Hines, James R., Jr (1995), 'Interest Allocation Rules, Financing Patterns, and the Operations of U.S. Multinationals', in Feldstein, M., Hines, J.R., Jr and Hubbard, R.G. (eds), *The Effects of Taxation on Multinational Corporations*, Chicago, University of Chicago Press.
- Frost, James Lyon (ed.) (1980), *Corporate Tax and Wealth Redistribution Effects in Mergers and Acquisitions*, MS Thesis, MIT, Alfred P. Sloan School of Management.
- Fujisaki, Tetsuya (ed.) (1987), *Effect of 1986 Tax Reform on Corporate Mergers: MS Thesis*, Massachusetts, Institute of Technology, Sloan School of Management.
- Fullerton, Don (1981), 'Corporate Tax Integration in the United States: A General Equilibrium Approach', **71** *American Economic Review*, 677-691.
- Fullerton, Don (1984), 'Which Effective Tax Rate?', **37** *National Tax Journal*, 23-41.
- Fullerton, Don (1987), 'The Indexation of Interest, Depreciation, and Capital Gains and Tax Reform in the United States', **32(1)** *Journal of Public Economics*, 25-51.
- Fullerton, Don and Hamdan, Lawrence A. (1983), 'The Aborted Phase in of Marginal Effective Corporate Tax Rates', **11(4)** *Public Finance Quarterly*, 437-464.
- Fullerton, Don and Rogers, Diane, Lim (eds) (1993), *Rogers, Diane, Lim*, Washington, DC, Brookings Institution.
- Fullerton, Don et al. (1981), 'Corporate Tax Integration in the United States: A General Equilibrium Approach', **71(4)** *American Economic Review*, 677-691.
- Fullerton, Don, Gillete, Robert and Mackie, James B. (eds) (1987), *Investment Incentives Under the Tax Reform Act of 1986*.
- Funke, Michael and Hubbard, R. Glenn (1992), 'Corporate Financial Policy, Taxation, and Macroeconomic Risk', *US Treasury*.
- Funke, Michael and Willenbockel, Dirk (1996), 'Das Jahressteuergesetz 1996 und die private Investitionstätigkeit', **42** *Ifo-Studien*, 221-233.

- Gabinet, Leon and Coffey, Ronald, J. (1977), 'The Implications of the Economic Concept of Income for Corporation-Shareholder Income Tax Systems', *27 Case Western Reserve Law Review*, 895 ff.
- Gaffrey, Dennis, J. and Wheeler, James, E. (1977), 'The Double Taxation of Corporate Source Income: Reality or Illusion?', *8 Tax Advisor*, 523 ff.
- Gammie, Malcolm (1991), 'Corporate Tax Harmonization: an "ACE" Proposal', *545 12 IBFD European Taxation*.
- Gammie, Malcolm (1992), 'The Harmonisation of Corporate Income Taxes in Europe: The Ruding Committee Report', *13 Fiscal Studies*, 108-121.
- Gammie, Malcolm (1997), 'The Future of UK Corporation Tax', in Head, G. and Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 207-270.
- Gammie, Malcolm and Robinson, Bill (1989), 'Introduction: The Impact of the Single Market on EC Tax Systems', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Gann, Pamela, B. (1985), 'Neutral Taxation of Capital Income: An Achievable Goal?', *48 Law and Contemporary Problems*, 77 ff.
- Gendron, Pierre-Pascal (1996), 'Corporate Tax Analysis in a Dominant Firm Model with Sunk Capital Investment', *29 Canadian Journal of Economics*, 298-302.
- Gentry, William M. (1994), 'Taxes, Financial Decisions and Organization Form: Evidence from Publicly Traded Partnerships', *53 Journal of Public Economics*, 223-244.
- Gentry, William M. and Hubbard, R. Glenn (1997), 'Fundamental Tax Reform and Corporate Financial Policy', *National Tax Association Proceedings*.
- Gerardi, Geraldine, Greatz, Michael, J. and Rosen, Harvey S., 'Corporate Integration Puzzles, US Dept of the Treasury', *3 National Tax Journal*, 307-314.
- Gergen, Mark P. (1997), 'Subchapter K and Passive Financial Intermediation', *51 Law Review*, 37 ff.
- Gertler, Mark and Hubbard, R. Glenn (1990), 'Taxation, Corporate Capital Structure, and Financial Distress', *Tax Policy and the Economy 4* in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Gilson, Ronald J. (1991), 'Unlimited Liability and Law Firm Organization: Tax Factors and the Direction of Causation', *99 Journal of Political Economy*, 420-425.
- Gilson, Ronald J. and Black, Bernard, S. (1995), *The Law and Finance of Corporate Acquisitions*.
- Gilson, Ronald J., Scholes, Myron S. and Wolfson, Mark, Alan, 'Taxation and the Dynamics of Corporate Control: the Uncertain Case for Tax Motivated Acquisitions', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Gilson, Stuart C., 'Transactions Costs and Capital Structure Choice: Evidence from Financially Distressed Firms', *Journal of Finance*.
- Ginsburg, Martin, D. (1992), 'Maintaining Subchapter S in an Integrated Tax World', *47 Tax Law Review*, 665-680.
- Ginsburg, Martin, D. and Mergers, Jack, Levin (eds) (1996), *Acquisitions and Buyouts*, Little, Brown and Company.

- Givoly, Dan, Hayn, Carla, Ofer, Aharon, D. and Sarig, Oded (1992), 'Taxes and Capital Structure: Evidence From Firms' Response to The Tax Reform Act of 1986', *5 Review of Financial Studies*, 331-355.
- Goldberg, Daniel, S. (1995), 'The Tax Treatment of Limited Liability Companies: Law in Search of Policy', *50 Business Lawyer*.
- Goode, Richard (1946), 'Postwar Corporate Tax Structure', U.S. Treasury.
- Goode, Richard (1951), *The Corporation Income Tax*.
- Goode, Richard (1966), 'Rates of Return, Income Shares, and Corporate Tax Incidence', in Krzyzaniak, M. (ed.), *Effects of Corporation Income Tax*, Papers Presented at the Symposium on Business Taxation.
- Goode, Richard (1989), 'Forward Shifting of the Corporate Tax in the Presence of Competing Imports: A Reply', *44(2) Public Finance*, 327-328.
- Goodman, Leonard and Miranti, Paul, J., Jr, *A Bridge between Knowledge and Action: E. R. A.*
- Goodspeed, Timothy J. and Frisch, Daniel, J. (eds), 'US Tax Policy and the Overseas Activities of US Multinational Corporations: A Quantitative Assessment'.
- Goolsbee, Austan, 'Taxes, Organizational Form and the Deadweight Loss of the Corporate Income Tax', *Journal of Public Economics*.
- Gordon, R.J. (1967), 'The Incidence of the Corporation Tax in U.S. Manufacturing', *57 American Economic Review*, 731-758.
- Gordon, Robert J. (1970), 'Specification Bias and Corporate Tax Incidence', *23(4) National Tax Journal*, 373-378.
- Gordon, Roger H., 'Taxation of Corporate Capital Income: Tax Revenues Versus Tax Distortions', *53 Quarterly Journal of Economics*, 223-244.
- Gordon, Roger H., 'Taxation of Investment and Savings in a World Economy', *76 American Economic Review*, 1086-1102.
- Gordon, Roger H. (ed.) (1981), 'Uncertainty and the Analysis of Corporate Tax Distortions', Proceedings of the 74th Annual Conference.
- Gordon, Roger H. (1984), 'Inflation, Taxation and Corporate Behavior', *99 Quarterly Journal of Economics*, 313 ff.
- Gordon, Roger H. and Bradford, David F. (1980), 'Taxes and Capital Structure: Evidence From Firms' Response to The Tax Reform Act of 1986', *14 Journal of Public Economics*, 109-136.
- Gordon, Roger H. and Jun, Joosung (1993), 'Taxes and the Form of Ownership of Foreign Corporate Equity', in Giovannini, A., Hubbard, R.G. and Slemrod, J. (eds), *Studies in International Taxation*, Chicago, University of Chicago Press, 13-44.
- Gordon, Roger H. and Levinsohn, James (1990), 'The Linkage Between Domestic Taxes and Border Taxes', in Razin and Slemrod (eds), *Taxation in the Global Economy*, Chicago, University of Chicago Press.
- Gordon, Roger H. and MacKie Mason, Jeffrey K. (1990), 'Effects of the Tax Reform Act of 1986 on Corporate Financial Policy and Organizational Form', in Slemrod, J. (ed.), *Do Taxes Matter?*, Cambridge, MA, MIT Press, 91-131.
- Gordon, Roger H. and MacKie Mason, Jeffrey K. (1994), 'Tax Distortions to the Choice of Organization Form', *55 Journal of Public Economics*, 279-306.
- Gordon, Roger H. and MacKie Mason, Jeffrey K. (1995), 'Why is There Corporate Taxation in a Small Open Economy? The Role of Transfer Pricing and Income Shifting', in Feldstein, M.,

- Hines, J.R., Jr and Hubbard, R.G. (eds), , *The Effects of Taxation on Multinational Corporations*, Chicago: University of Chicago Press, 67-94.
- Gordon, Roger H. and Malkiel, Burton, G., 'Corporation Finance', in Aaron, Henry and Pechman, Joseph (eds), *How Taxes Affect Economic Behavior*, Washington, DC, Brookings Institution..
- Gordon, Roger H. and Slemrod, Joel (1998), *Are 'Real' Responses to Taxes Simply Income Shifting between Corporate and Personal Tax Bases?*, Office of Tax Research, University of Michigan Business School, 98-9.
- Gordon, Roger H. and Wilson, John D. (1986), 'An Examination of Multijurisdictional Corporate Income Taxation Under Formula Apportionment', *Econometrica*, 1357-1373.
- Gordon, Roger H. and Wilson, John Douglas (1989), 'Measuring the Efficiency Cost of Taxing Risky Capital Income', **79** *American Economic Review*, 427-439.
- Goudie, A.W. (1984), 'Tax Exhaustion: Estimates from a Disaggregate Model of Corporate Tax Liabilities', **16(2)** *Applied Economics*, 205-224.
- Goulder, Lawrence H. and Summers, Lawrence H. (1989), 'Tax Policy, Asset Prices, and Growth: A General Equilibrium Analysis', **38(3)** *Journal of Public Economics*, 265-296.
- Gourevitch, Harry, G. (1977), 'Corporate Tax Integration: The European Experience', **31** *Tax Lawyer*, 65 ff.
- Gourevitch, Harry, G. (1978), 'Corporate Tax Integration: The European Experience', **31** *Tax Lawyer*, 65 ff.
- Gradus, Raymond and de Zeeuw, Aart (1989), *Corporate Tax Rate Policy and Public and Private Employment*, Discussion paper, Center for Economic Research, Tilburg University.
- Graetz, Michael J. (1989), 'The Tax Aspects of Leveraged Buyouts and Other Corporate Financial Restructuring Transactions', **42** *Tax Notes*, 721 ff.
- Graetz, Michael J. and O'Hear, Michael, M. (1997), 'The "Original Intent" of U.S. International Taxation', **46** *Duke Law Journal*, 1021 ff.
- Graham, John, R. (1996a), 'Debt and the Marginal Tax Rate', *Journal of Financial Economics*.
- Graham, John, R. (1996b), 'Proxies for the Corporate Marginal Tax Rate', **42** *Journal of Financial Economics*, 187-221.
- Gravelle, Jane G. (1979), 'Differential Taxation of Capital Income: Another Look at the 1986 Tax Reform Act', **42** *National Tax Journal*, 441-463.
- Gravelle, Jane G. (1981), 'The Social Cost of Non-Neutral Taxation: Estimates from Nonresidential Capital', in Hulten, Charles R (ed.), *Depreciation, Inflation, and the Taxation of Income from Capital*, Washington, Urban Institute.
- Gravelle, Jane G. (1982), *Safe Harbor Leasing under the Economic Recovery Tax Act of 1981 and Investment Efficiency*.
- Gravelle, Jane G. (1995), 'The Corporate Income Tax: Economic Issues and Policy Options', **48** *National Tax Journal*, 267-277.
- Gravelle, Jane G. (ed.) (1991), *Corporate Tax Integration: Issues and Options*, Washington, DC, Congressional Research Service, Library of Congress.
- Gravelle, Jane G. (ed.) (1994), *The Economic Effects of Taxing Capital Income*, Cambridge, MA, MIT Press.

- Gravelle, Jane G. and Eesenwein, Gregg, A. (1983), 'The Measurement and Interpretation of Effective Corporate Tax Rates: A Comment', *Tax Notes*, 867-872.
- Gravelle, Jane G. and Kotlikoff, Laurence J. (1988), 'Does the Harberger Model Greatly Understate the Excess Burden of the Corporate Tax?: Another Model Says Yes'.
- Gravelle, Jane G. and Kotlikoff, Laurence J. (1989), 'The Incidence and Efficiency Costs of Corporate Taxation when Corporate and Noncorporate Firms Produce the Same Good', *97 Journal of Political Economy*, 749-780.
- Gravelle, Jane G. and Kotlikoff, Laurence J. (1993), 'Corporate Tax Incidence and Inefficiency when Corporate and Noncorporate Goods Are Close Substitutes', *31(4) Economic Inquiry*, 501-516.
- Gravelle, Jane G. and Kotlikoff, Laurence J. (1995), 'Corporate Taxation and the Efficiency Gains of the 1986 Tax Reform Act', *6 Economic Theory*, 51-81.
- Green, Richard C. and Talmor, Eli (1985), 'The Structure and Incentive Effects of Corporate Tax Liabilities', *40(4) Journal of Finance*, 1095-1114.
- Green, Robert, A. (1993), 'The Future of Source-Based Taxation of the Income of Multinational Enterprises', *79 Cornell Law Review*, 67-70.
- Grier, Paul and Strebel, Paul (1980), 'The Empirical Relationship between Taxation and Capital Structure', *15 Financial Review*, 45-57.
- Griffith, Thomas, D. (1983), 'Integration of the Corporate and Personal Income Taxes and the ALI Proposal', *23 Santa Clara Law Review*, 715 ff.
- Gropp, Reint, E. (ed.) (1994), *Corporate Taxation and Capital Structure Choice in the U.S. and Germany*, Wisconsin University.
- Gropp, Reint, E. (1995), 'Corporate Taxation and Capital Structure Choice in Germany: A General Equilibrium Model', *52 Finanzarchiv*, 196-121.
- Grubert, Harry and Mutti, John H. (eds) (1987), 'The Impact of the Tax Reform Act of 1986 on Trade and Capital Flows'.
- Grubert, Harry and Mutti, John H. (1991), 'Taxes, Tariffs and Transfer Pricing in Multinational Corporate Decision Making', *73 Review of Economics and Statistics*, 285-293.
- Grubert, Harry and Mutti, John H. (1994), 'International Aspects of Corporate Tax Integration: The Contrasting Role of Debt and Equity Flows', *47(1) National Tax Journal*, 111-133.
- Grubert, Harry, Goodspeed, Timothy J. and Swenson, Deborah (1991), *Explaining the Low Taxable Income of Foreign-controlled Companies in the United States*.
- Guenther, David, A. (1992), 'Taxes and Organizational Form: A Comparison of Corporations and Master Limited Partnerships, UCT', *67 Accounting Review*, 17-45.
- Gulley, O. David and Santerre, Rexford E. (1993), 'The Effect of Tax Exemption on the Market Share of Nonprofit Hospitals', *46(4) National Tax Journal*, 477-486.
- Hadjina, Branko and Sever, Ivo (1995), 'Ucinci Upravljanja Porezom Poduzeca s Posebnim Osvrtom na Mala i Srednja Poduzeca. (Effects of Company Taxation — With Special Regard to SMEs. With English summary.)', *13 Zbornik Radova Ekonomskog Fakulteta Rijeka*, 479-496.
- Hall, Mark A. and Columbo, John D. (1991), 'The Charitable Status of Nonprofit Hospitals: Toward a Donative Theory of Tax Exemption', *66 Washington Law Review*, 307-411.
- Hall, Robert E. (1991), 'Dividends, Capital Gains, and the Corporate Veil: Evidence from Britain, Canada, and the United States: Comment', in Bernheim, B. Douglas and Shoven, John B. (eds), *National Saving and Economic Performance*, Chicago, University of Chicago Press, 71-73.

- Halpem, Paul and Mintz, Jack M. (1992), 'Taxation and Its Impact on Market Structure', in Bird, R.M. and Mintz, J.M. (eds), *Taxation to 2000 and Beyond. Canadian Tax Paper*, Toronto, Canadian Tax Foundation, 214-256.
- Halperin, Daniel I. (1992), 'Commentary, Will Integration Increase Efficiency? The Old and New View of Dividend Policy', **47** *Tax Law Review*, 645 ff.
- Hamill, Susan, Pace (1995), 'The Taxation of Domestic Limited Liability Companies And Limited Partnerships: a Case For Eliminating The Partnership Classification Regulations', **73** *Washington United Law Quarterly*, 565 ff.
- Hamill, Susan, Pace (1996), 'The Limited Liability Company: A Catalyst Exposing the Corporate Integration Question', **95** *Michigan Law Review*, 393 ff.
- Hamilton, Bob, Shah, Anwar and Whalley, John (eds) (1986), *A Dynamic General Equilibrium Model for Corporate Tax Policy Evaluation in Canada*, Canada, Dept. of Finance.
- Hammer, Richard, M. (1975), 'The Taxation of Income from Corporate Shareholders: Review of Present Systems in Canada, France, Germany, Japan and the UK', **28** *National Tax Journal*, 315 ff.
- Hammer, Richard, M. (1979), 'Corporate/Shareholder Tax Integration', **33** *Bulletin for International Fiscal Documentation*, 290-292.
- Han, Kim E., 'Optimal Capital Structure in Miller's Equilibrium', in Bhattacharya, S. and Constandinides, G.M. (eds), *Financial Markets and Incomplete Information*.
- Han, Kim E. (1978), 'A Mean-variance Theory of Optimal Capital Structure and Corporate Debt Capacity', **33** *Journal of Finance*, 45-63.
- Haney, James, R. (1977), 'Integration of the Corporate and Individual Income Taxes', **3** *National Tax Journal*, 345-358.
- Haney, James, R. (1979), 'Integration of Corporate and Individual Income Taxes', **33** *Bulletin for International Fiscal Documentation*, 298-305.
- Hanka, Gordon, *The External Effects of Debt: A Back to Basics Evaluation of the Tax Incentive for Leverage*.
- Hansmann, Henry (1981), 'The Rationale for Exempting Nonprofit Organizations from Corporate Income Taxation', **91** *Yale Law Journal*, 54 ff.
- Harberger, Arnold, C. (1962), 'The Incidence of the Corporation Income Tax', **70** *Journal of Political Economy*, 215-240. Reprinted in Harberger, Arnold C. (1974), *Taxation and Welfare*, 135-62.
- Harberger, Arnold, C. (1966), 'Efficiency Effects of Taxes on Income from Capital', in Krzyzaniak, Marian (ed.), *Effects of the Corporation Tax*, Detroit, Wayne State University Press. Reprinted in Harberg, Arnold C; (ed.) (1974), *Taxation and Welfare* 162-184.
- Harberger, Arnold, C. (1980), 'Vignettes on the World Capital Market', **70** *American Economic Review*, 331 ff.
- Harberger, Arnold, C. (1983), 'The State of the Corporate Income Tax: Who Pays? Should it be Repealed?', in Walker, Charles E. and Bloomfield, Mark A. (eds), *New Directions in Federal Tax Policy for the 1980's*, Cambridge, Ballinger Publishing Company.

- Harberger, Arnold, C. (ed.) (1959), *The Corporation Income Tax: An Empirical Appraisal*, U.S. Congress House, Committee on Ways and Means, Tax Revision Compendium.
- Hardman, Ann Louise (1992), 'Corporate Tax Reform: The Key to International Competitiveness', **25** *Vanderbilt Journal of Transnational Law*, 509 ff.
- Harris, David, G., 'The Impact of US Law Revision on Multinational Corporation Decision Making', **31** *Journal of Accounting Research*, 111-140.
- Harris, David, Morck, Randall, Slemrod, Joel and Yeung, Bernard (1993), 'Incoming Shifting in U.S. Multinational Corporations', 277-302.
- Harris, M. and Raviv, Artur (1991), 'The Theory of Optimal Capital Structure', **48** *Journal of Finance*, 297-356.
- Harris, Peter, A. (1994), 'Passing Corporate Foreign Tax Credits to Shareholders: Lessons from the UK's FID Scheme, Supreme Court of Queensland and of England & Wales', **11** *Australian Tax Forum*, 229-246.
- Harris, Peter, A. (ed.) (1996), *Corporate/Shareholder Income Taxation and Allocating Taxing Rights Between Countries: A Comparison of Imputation Systems*, Amsterdam, IBFD.
- Harris, Richard A., Franks, Julian and Mayer, Colin (1987), *Means of Payment in Takeovers: The Results for the U.K. and U.S.*, National Bureau of Economic Research, Inc., 2456.
- Hart, Kenneth, D. (ed.) (1987), 'Research and Development Impacts of Corporate Income Tax Reform: A Manuscript Report'.
- Hartman, David, G. (1985), 'Tax Policy and Foreign Direct Investment', **26** *Journal of Public Economics*, 107-121.
- Haskins, Matthew, P. (1995), 'The Theory and Politics of Tax Integration', **67** *Tax Notes*, 401 ff.
- Hayn, Carla (1989), 'Tax Attributes as Determinants of Shareholder Gains in Corporate Acquisitions', **23** *Journal of Financial Economics*, 121 ff.
- Head, John G. (1997), 'Company Tax Structure and Company Tax Incidence', **4** *International Tax and Public Finance*, 61-100. "Company Tax Systems: From Theory to Policy" in Head, John G. and Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, Conference Series No. 18 (1997)
- Head, John G. and Krever, Richard (eds) (1997), *Company Tax Systems*, Australian Research Foundation, 18.
- Heaton, Hal (1986), 'The Relative Yields on Taxable and Tax Exempt Debt', **18(4)** *Journal of Money, Credit, and Banking*, 482-494.
- Heaton, Hal (1987), 'On the Bias of the Corporate Tax against High Risk Projects', **22(3)** *Journal of Financial and Quantitative Analysis*, 365-371.
- Hein, Scott E., Koch, Timothy W. and MacDonald, S. Scott (1995), 'The Changing Role of Commercial Banks in the Municipal Securities Market', **27(3)** *Journal of Money, Credit, and Banking*, 894-906.
- Hellerstein, Jerome R. (1957), 'Mergers, Taxes and Realism', **71** *Harvard Law Review*.
- Hellerstein, Jerome R. (1959), 'Judicial Review of Property Tax Assessments', **14** *Tax Law Review*, 327-352.
- Hellerstein, Walter (1980), 'State Income Taxation of Multijurisdictional Corporations: Reflections on Mobil, Exxon, and H.R.', **113** *Michigan Law Review*, 160 ff.

- Hendershott, Patric H. (1991), 'The Long-Run Impact on Federal Tax Revenues and Capital Allocation of a Cut in the Capital Gains Tax Rate', **19(1)** *Public Finance Quarterly*, 3-21.
- Hendershott, Patric H., Toder, H. and Won Yunhi (1991), 'Effects of Capital Gains Taxes on Revenue and Economic Efficiency', **44(1)** *National Tax Journal*, 21-40.
- Hershberg, Susan (1979), 'Consolidated Returns: A Tax Policy Perspective', **27** *Canadian Tax Journal*, 552 ff.
- Hicks, Samuel, Alton, *The Effect of Corporate Tax Incentives on the Horizontal Equity*.
- Higgins, Mark, Marthew (ed.) (1989), *An Empirical Analysis of the Relationship Between Corporate Effective Tax Rates and Book Effective Tax Rates with an Analysis of the Financial Characteristics That Influence Corporate Effective Tax Rates*.
- Higson, C. and Eliot, J. (1994), 'The Incentive to Locate a Multinational Firm: The Effect of Tax Reforms in the United Kingdom', **1** *International Tax and Public Finance*, 81-97.
- Hines, James R., Jr (1994), 'Credit and Deferral as International Investment Incentives', **2** *Journal of Public Economics*, 323-347.
- Hines, James R., Jr (1996), 'Altered States: Taxes and the Location of Foreign Direct Investment in America', **86** *American Economic Review*, 1076-1094.
- Hines, James R., Jr (1997), 'Tax Policy and the Activities of Multinational Corporations', in Auerbach, Alan (ed.), *Fiscal Policy*, MIT Press.
- Hines, James R., Jr and Hubbard, R. Glenn (1990), 'Coming Home to America: Dividend Repatriations by U.S. Multinationals', in Razin and Slemrod (eds), *Taxation in the Global Economy*, Chicago, University of Chicago Press, 161-207.
- Hobbes, Patrick, E. (1995), 'Entity Classification: The One Hundred-year Debate', **44** *Catholic University Law Review*, 437 ff.
- Hodder, James E. and Senbet, Lemma W. (1990), 'International Capital Structure Equilibrium', **45(5)** *Journal of Finance*, 1495-1516.
- Holland, Daniel, M. (1975), 'Some Observations on Full Integration', **28** *National Tax Journal*, 353 ff.
- Hong, Lee Fook (1989), '1989 Budget: Pro business or Pro family? Singapore', **43(6)** *Bulletin for International Fiscal Documentation*, 283-285.
- Hong, Lee Fook (1990), '1990: Celebration Budget for a Maturing Nation: Singapore', **44(6)** *Bulletin for International Fiscal Documentation*, 273-276.
- Hong, Lee Fook (1991), 'Singapore's 1991 Budget: A Successful Nation's Budget', **45(5)** *Bulletin for International Fiscal Documentation*, 211-213.
- Hong, Lee Fook (1992), '1992 Budget: A Carry on Budget with a Few Surprises: Singapore', **46(5)** *Bulletin for International Fiscal Documentation*, 254-256.
- Horst, Thomas, 'A Note on Optimal Raxation of International Investment Income Quarterly', **94** *Journal of Economics*, 793-799.
- Horst, Thomas (1982), 'Some Issues in the Calculation and Uses of Effective Corporate Income Tax Rates', *Tax Notes*, 347-351.
- Howitt, Peter and Sinn, Hans-Werner (1989), 'Gradual Reforms of Capital Income Taxation', **79** *American Economic Review*, 106-124.
- Hreha, Karen, S. and Silhan, Peter, A. (1986), 'An Empirical Analysis of Unitary Apportionment', *Journal of the American Taxation Association*, 7-18.

- Hubbard, Jeff and Michaely, Roni (1997), 'Do Investors Ignore Dividend Taxation? A Reexamination of the Citizens Utilities Case', **32** *Journal of Financial and Quantitative Analysis*, 117-135.
- Hubbard, R. Glenn (1990), *Asymmetric Information, Corporate Finance and Investment*, Chicago.
- Hubbard, R. Glenn (1993), 'Corporate Tax Integration: A View from the Treasury Department', **7(1)** *Journal of Economic Perspectives*, 115-132.
- Hubbard, R. Glenn and Reiss, Peter C. (1989), 'Corporate Payouts and the Tax Price of Corporate Retentions: Evidence from the Undistributed Profits Tax of 1936-1938'.
- Huber, Bernd (1994), 'Dividend Taxes and Investment', **51** *Finanzarchiv*, 457-471.
- Hufbauer, Gary, C. (ed.) (1992), *U.S. Taxation of International Income*.
- Huizinga, Harry (1992), 'The Tax Treatment of R&D; Expenditures of Multinational Enterprises', **47(3)** *Journal of Public Economics*, 343-359.
- Hulten, Charles R. and Robertson, James, W. (1982), *Corporate Tax Policy and Economic Growth: An Analysis of the 1981 and 1982 Tax Acts*, Washington, DC, Urban Institute.
- Institute For Fiscal Studies (1991), *Equity for Companies: A Corporation Tax for the 1990s*, Fourth Report of the IFS Capital Taxes Group, 26.
- International Fiscal Association (1987), 'The Fiscal Residence of Companies: La Residence Fiscale Des Societes: Die Steuerliche Ansässigkeit von Kapitalgesellschaften: La Residencia Fiscal De Las Sociedades', in *Cahiers de Droit Fiscal International*.
- International Fiscal Association (1987), *Tax Problems of the Liquidation of Corporations: Regime de liquidation des societes: Steuerliche Probleme der Liquidation von Körperschaften: Problemas fiscales de la liquidacion de sociedades*.
- International Fiscal Association (1992), 'Tax Consequences of International Acquisitions and Business Combinations - Consequences fiscales des acquisitions et regroupements internationaux d'entreprises', in *Cahiers de Droit Fiscal International*.
- International Fiscal Association (1992), 'Transfer Pricing in the Absence of Comparable Market Prices - Determination des prix de transfert en l'absence de prix de marche comparables', in *Cahiers de Droit Fiscal International*.
- International Fiscal Association (1993), 'Corporate Tax on Distributions (Equalization Tax)', *Proceedings of the 47th Congress of the International Fiscal Association*.
- International Fiscal Association (ed.) (1993), 'Interpretation of Double Taxation Conventions', **78a** in *Cahiers de Droit Fiscal International*.
- Iqbal, Mahmood (1994), 'A Corporate Tax Comparison for Canada, the United States and Mexico', **3(1)** *Canadian Business Economics*, 54-64.
- Isaac, John (1989), 'Corporate Tax Harmonisation', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Isaac, John (1997), 'A Comment on the Viability of the Allowance for Corporate Equity', **18** *Fiscal Studies*, 303-318.
- Isard, Peter (1990), 'Corporate Tax Harmonization and European Monetary Integration', **43(1)** *Kyklos*, 3-24.
- Isenbergh, Joseph (1988), 'Perspectives on the Deferral of United States Taxation of the Earnings of Foreign Corporations', *Taxes*, 1062 ff.

- Iwamoto, Yasushi (1992), 'Effective Tax Rates and Tobin's q ', **48** *Journal of Public Economics*, 225-237.
- Jaffe, Jeffrey F. (1978a), 'Corporate Taxes, Inflation, the Rate of Interest, and the Return to Equity', **13** *Journal of Financial and Quantitative Analysis*, 55-64.
- Jaffe, Jeffrey F. (1978b), 'A Note on Taxation and Investment', **33** *Journal of Finance*, 1439-1445.
- Jaffe, Jeffrey F. (1991), 'Taxes and the Capital Structure of Partnerships, REIT's, and Related Entities', **46** *Journal of Finance*, 401-407.
- Jaffe, Jeffrey F. and Westerfield, Randolph (1984), 'Leverage and the Value of a Firm under a Progressive Income Tax: A Correction and Extension', **8** *Journal of Banking and Finance*, 491-494.
- Janeba, Eckhard (1995), 'Corporate Income Tax Competition, Double Taxation Treaties, and Foreign Direct Investment', **56(2)** *Journal of Public Economics*, 311-325.
- Janeba, Eckhard (ed.), *Corporate Income Tax Competition, Double Taxation Treaties, and Foreign Direct Investment*, Department of Economics, University of Bonn, A-36.1.
- Jassy, B. (1974), 'Treatment of Bootstrap Stock Acquisitions: The Redemption Route vs. Dividend Route', **87** *Harvard Law Review*, 1459 ff.
- Jeffcote, Bernard (ed.) (1993), *The Developing European Corporate Tax System*.
- Jensen, Michael C. (1986), 'Agency Costs of Free Cash Flow, Corporate Finance, and Takeovers', **32** *American Economic Review*, 323 ff.
- Jensen, Michael C. (1988), 'The Takeover Controversy: Analysis and Evidence', in Coffee, John, Lowenstein, Louis and Rose-Ackerman, Susan (eds), *Knights, Raiders and Targets: The Impact of the Hostile Takeover*, Oxford, Oxford University Press.
- Jensen, Michael C. and Meckling, W. (1976), 'Theory of the Firm: Managerial Behavior, Agency Costs and Ownership Structures', **3** *Journal of Financial Economics*, 305-360.
- Jensen, Michael C., Kaplan, Steven, N. and Stiglin, Laura (1989), 'The Effects of LBOs on Tax Revenues of the U.S. Treasury', **42** *Tax Notes*, 727 ff.
- Jensen, Ronald, H. (1991), 'Of Form and Substance: Tax Free Incorporations and Other Transactions Under Section 351', **11** *Virginia Tax Review*, 349 ff.
- Jones, David D. (1979), 'Corporations, Double Taxation and the Theory of Integration', **27** *Canadian Tax Journal*, 405 ff.
- Jones, Robert (1991), 'The Effective Taxation of Australian Corporate Source Income', in Hamilton, Clive (ed.), *The Economic Dynamics of Australian Industry*, Sydney, Allen and Unwin, distributed by Paull, Concord, Mass., 196-215.
- Jones, Shirley, A. (1994), 'The Evolution of the Corporate Minimum Tax', **20** *Journal of Corporate Taxation*, 351 ff.
- Jun, Joosung (1995), *The Impact of International Tax Rules on the Cost of Capital*.
- Kalambokidis, Laura (ed.) (1992), *What Is Being Taxed?: A Test for the Existence of Excess Profit in the Corporate Income Tax Base*, University of Michigan.
- Kale, Jayant R. and Noe, Thomas H. (1990), 'Corporate Hedging under Personal and Corporate Taxation', **11(3)** *Managerial and Decision Economics*, 199-205.
- Kale, Jayant R. and Noe, Thomas H. (1992), 'Taxes, Financial Distress, and Corporate Capital Structure', **32(1)** *Quarterly Review of Economics and Finance*, 71-83.

- Kale, Jayant R., Noe, Thomas H. and Ramirez, Gabriel G. (1991), 'The Effect of Business Risk on Corporate Capital Structure: Theory and Evidence', **46(5)** *Journal of Finance*, 1693-1715.
- Kanda, Hideki and Levmore, Saul (1991), 'Taxes, Agency Costs, and the Price of Incorporation', **77** *Virginia Law Review*, 211-256.
- Kannianen, Vesa and Sodersten, Jan (1994), 'Costs of Monitoring and Corporate Taxation', **55** *Journal of Public Economics*, 307-321.
- Kannianen, Vesa and Sodersten, Jan (1995), 'The Importance of Reporting Conventions for the Theory of Corporate Taxation', **57** *Journal of Public Economics*, 417-430.
- Kaplan, Steven E. (1989), 'Management Buyouts: Evidence on Taxes as a Source of Value', **44** *Journal of Finance*, 611-632.
- Karier, Thomas (1991), 'A Proposal to Restore the Corporate Profit Tax', **49(2)** *Review of Social Economy*, 141-167.
- Kassanen, Eero (1992), *Sensitivity of Dividend Decisions to Corporate Tax Reform: Empirical Test with Aggregate Data of Finnish Firms*, Felsingin Kauppakorkealu, 1235-5674.
- Keen, Michael (1993), 'Corporation Tax, Foreign Direct Investment and the Single Market in European Integration', in Winters, L., Venables, Alan and Anthony J (eds), *Trade and Industry*, Cambridge, Cambridge University Press, 165-198.
- Keen, Michael and Shiantarelli, Fabio (eds) (1991), 'Corporation Tax Asymmetries and Optimal Financial Policy', **43** *Oxford Economic Papers*, 280-291.
- Keller, Robert R. (1985), 'The Tax Effects of a Shareholder's Post-Incorporation Sale of Stock: A Reappraisal', **2** *Tax Law Journal*, 107-111.
- Kiefer, Donald W. (1973), 'The 1973 Tax Package: Corporate Tax Restructuring', **48** *Indiana Business Review*, 1-2.
- Kiefer, Donald W. (1990), 'Lock-In Effect Within a Simple Model of Corporate Stock Trading', **53** *National Tax Journal*.
- Kimbrough, Kent P. (1984), 'The Corporation Income Tax in the Open Economy', **25** *International Economic Review*, 391-407.
- King, Mervyn A. (1971), 'Corporate Taxation and Dividend Behavior: A Comment', *Review of Economic Studies*, 377 ff.
- King, Mervyn A. (1972), 'Corporate Taxation and Dividend Behavior: a Further Comment', **39** *Review of Economic Studies*, 231 ff.
- King, Mervyn A. (1974a), 'Dividend Behavior and the Theory of the Firm', **41** *Economica*, 25-34.
- King, Mervyn A. (1974b), 'Taxation and the Cost of Capital', **41** *Review of Economic Studies*, 21-35.
- King, Mervyn A. (1975), 'Taxation, Corporate Financial Policy, and the Cost of Capital: A Comment', **4** *Journal of Public Economics*, 271 ff.
- King, Mervyn A. (ed.) (1977), *Public Policy and the Corporation*, London, Chapman and Hall.
- King, Mervyn A. (1987), 'The Cash Flow Corporate Income Tax', in Feldstein, M. (ed.), *The Effects of Taxation on Capital Accumulation*, Chicago, University of Chicago Press.
- King, Mervyn A. and Fullerton, David J. (eds) (1984), *The Taxation of Income from Capital: A Comparative Study of the US, UK, Sweden, and West Germany*, Chicago.

- Kingson, Charles I. (1976), 'The Deep Structure of Taxation: Dividend Distributions', **85** *Yale Law Journal*, 861 ff.
- Kingson, Charles I. (1991), 'The Foreign Tax Credit and its Critics', **9** *American Journal of Tax Policy*, 1 ff.
- Klassen, Kenneth, Lang, Mark and Wolfson, Alan (1993), 'Geographic Income Shifting by Multinational Corporations in Response to Tax Rate Changes', *Journal of Accounting Research*, 141-173.
- Klein (1972), 'Income Taxation and Legal Entities', **20** *UCLA Law Review*, 13 ff.
- Klein, William A. (1965), 'The Incidence of the Corporation Income Tax: A Lawyer's View of a Problem in Economics', *Wisconsin Law Review*, 576 ff.
- Klein, William A. and Zolt, Eric M. (1995), 'Business Form, Limited Liability, and Tax Regimes: Lurching Toward a Coherent Outcome', **66** *UCLA Law Review*, 1001-1041.
- Knauer, Nancy J. (1994), 'The Paradox of Corporate Giving: Tax Expenditures, the Nature of the Corporation, and the Social Construction of Charity', **44** *DePaul Law Review*, 1 ff.
- Knoll, Michael S. (1993), 'Taxing Prometheus: How the Corporate Interest Deduction Discourages Innovation and Risk-taking', **38** *Villanova Law Review*, 1461 ff.
- Knoll, Michael S. (1996), 'An Accretion Corporate Income Tax', **49** *Stanford Law Review*, 1 ff.
- Konrad, Kai A. (1991), 'The Decision to Go Public, Accrued Capital Gains and Taxation', **37** *Economics Letters*, 439-445.
- Kopcke, Richard W. and Rosengren, Eric S. (1989), 'Are the Distinctions Between Debt and Equity Disappearing?: An Overview'.
- Kopcke, Richard W. and Rosengren, Eric S. (eds) (1989), 'Regulation of debt and equity', Proceedings of a conference held at Melvin Village, New Hampshire.
- Kornhauser, Marjorie E. (1990), 'Corporate Regulation and the Origins of the Corporate Income Tax', **66** *Industrial Law Journal*, 53 ff.
- Kose John and Senbet, Lemma W. (1989), *Limited Liability, Tax Deductibility of Corporate Debt, and Public Policy*, Salomon Brothers Center for the Study of Financial Institutions, 544.
- Kose, John (1987), 'Risk-Shifting Incentives and Signaling Through Corporate Capital Structure', **42** *Journal of Finance*, 623 ff.
- Kose, John and Williams, Joseph (1985), 'Dividends, Dilution and Taxes: A Signalling Equilibrium', **40** *Journal of Finance*, 1053-1070.
- Kose, John, Teresa, A. and Ronen, Joshua (1996), 'Corporate Taxes, Choice among Accounting Alternatives, and Information Content of Earnings', **11** *Journal of Accounting, Auditing and Finance*, 163-183.
- Kose, John, Senbet, Lemma W. and Sundaram, Anant (1994), 'Corporate Limited Liability and the Design of Corporate Taxation'.
- Krause-Junk, Gerold (1988), 'Überlegungen zu einem künftigen Europäischen Körperschaftsteuersystem', **34** *Konjunkturpolitik*, 268-290.
- Krueger, LaVern Eldon (ed.) (1974), *The Value Added Tax Compared to the Corporate Income Tax: Effects on Capital Formation*, Colorado, Coen Lecture, University Of Colorado Law School.
- Krzyzaniak, Marian (ed.) (1966), *Effects of the Corporation Income Tax*, Wayne State University.

- Krzyzaniak, Marian and Musgrave, Richard A. (eds) (1963), *The Shifting of the Corporation Income Tax*, Baltimore, MD, John Hopkins University Press.
- Kurtz, Jerome (1992), 'The Limited Liability Company and the Future of Business Taxation: A Comment on Professor Berger's Plan', *47 Tax Law Review*, 815 ff.
- Kwall, Jeffrey L. (1990), 'The Uncertain Case Against the Double Taxation of Corporate Income', *68 Law Review*, 613 ff.
- Kwall, Jeffrey L. (1997), 'Taxing Private Enterprise in the New Millenium', *51 Tax Lawyer*, 229 ff.
- Kweit, Catherine and Rubin, Marilyn M. (1982), 'Impact of the Economic Recovery Tax Act on State and Local Revenues: A Case Study of New York City Corporate Tax Revenues', *35(3) National Tax Journal*, 295-306.
- Lakonishok, Josef and Baruch, Lev (1987), 'Stock Splits and Stock Dividends: Why, Who, and When', *42 Journal of Finance*, 913 ff.
- Lall, Vinay D. (1983), *Fiscal Incentives and Corporate Tax Saving*, New Dehli, National Institute of Public Finance and Policy.
- Lall, Vinay D. (ed.) (1984), *Economic Effects of the Corporate Profits Tax*, New Dehli, National Institute of Public Finance and Policy.
- Lamoureux, Christopher G. and Poon, Percy (1987), 'The Market Reaction to Stock Splits', *42 Journal of Finance*, 1347 ff.
- Lander, Joel Martin (1989), *Optimal Taxation Policies Which Affect Capital Structure*, Law and Economics Workshop, UCLA Economics Dept..
- Lander, Joel Martin (ed.) (1990), *Essays on the Corporate Tax Policy Effects on Investments and Financing Choices*, UCLA.
- Langbein, Stanley I. (1986), 'The Unitary Method and the Myth of Arm's Length', *30 Tax Notes*, 625 ff.
- Lapidoth, Arye (1990), 'The 1990 Israeli Tax Reform: Israel', *44(12) Bulletin for International Fiscal Documentation*, 609-610.
- Laramie, Anthony J., *The Incidence of the Corporate Profits Tax Revisited: A Post Keynesian Approach*, Bard College, Jerome Levy Economics Institute, 109.
- Laumas, G.S. (1971), 'The Effectiveness of Corporate Tax Increases as an Anti inflationary Policy', *30(4) American Journal of Economics and Sociology*, 397-402.
- Leauby, Bruce Alan (ed.) (1990), *Determinants of Corporate Tax Avoidance Strategy: an Empirical Analysis*, Drexel University.
- LeClere, Marc J. (1993), 'Commonality among Alternative Measures of Corporate Effective Tax Rates', in Stern, Jerrold J. (ed.), *Advances in Taxation. Volume 4*, Greenwich, CT, JAI Press, 175-195.
- Lee, Dwight R. (ed.) (1986), *Taxation and the Deficit Economy: Fiscal Policy and Capital Formation in the United States*, - San Francisco, Pacific Research Institute for Public Policy, 554 p.
- Lee, John W. (1988), 'Entity Classification and Integration: Publicly Traded Partnerships, Personal Service Corporations, and the Tax Legislative Process', *8 Virginia. Tax Review*, 57 ff.
- Leechor, Chad and Mintz, Jack M. (1993), 'On the Taxation of Multinational Corporate Investment When the Deferral Method is Used by the Capital Exporting Country', *51(1) Journal of Public Economics*, 75-96.
- Lehn, Kenneth and Poulsen, Annette B. (1987), *Sources of Value in Leveraged Buyouts*.

- Lenhardt, Ingrid Lynn (1996), 'Limited Liability Companies: The Corporate and Tax Advantages of a Limited Liability Company: A German Perspective', **64** *University of Cincinnati Law Review*, 551 ff.
- Lent, George E. (1948), *The Impact of the Undistributed Profits Tax*, Columbia University Press, 1936-1937.
- Levinsohn, James and Slemrod, Joel (1993), 'Taxes, Tariffs, and the Global Corporation', **97** *Journal of Public Economics*, 116 ff.
- Levis, Mario (1986), 'The 1984 Budget: The Impact on Corporate Tax Payments', **0(0)** *National Westminster Bank Quarterly Review*, 28-42.
- Levmore, Saul (1982), 'Identifying Section 306 Stock: The Sleeping Beauty of Revenue Ruling 66-332', **2** *Virginia Tax Review*, 59-78.
- Levmore, Saul (1987), 'The Positive Role of Tax Law in Corporate and Capital Markets', **12** *Journal of Corporation Law*, 483-502.
- Levmore, Saul (1988), 'Recharacterizations and the Nature of Theory in Corporate Tax Law', **136** *University of Pennsylvania Journal Law Review*, 1019-1065.
- Levmore, Saul (1992), 'Partnerships, Limited Liability Companies, and Taxes: A Comment on the Survival of Organizational Forms', **70** *Washington University Law Quarterly (Symposium Comment)*, 489-495.
- Lewellen, Wilbur G. and Mauer, David C. (1988), *Tax Options and Corporate Capital Structures*, Graduate School of Business, University of Wisconsin-Madison Wisconsin, 1-88-4.
- Lintner, John V. (1956), 'The Distribution of Incomes of Corporations among Dividends, Retained Earnings, and Taxes', **46** *American Economic Review*, 97-113.
- Litzenberger, Robert H. and Ramaswamy, K. (1979), 'The Effect of Personal Taxes and Dividends on Capital Asset Prices: Theory and Empirical Evidence', **7** *Journal of Financial Economics*, 163-195.
- Litzenberger, Robert H. and Ramaswamy, K. (1982), 'The Effects of Dividends on Common Stock Prices: Tax Effects or Information Effects', **37** *Journal of Finance*, 429-443.
- Litzenberger, Robert H. and Van Horne, James C. (1978), 'Elimination of the Double Taxation of Dividends and Corporate Financial Policy', **33** *Journal of Finance*, 737 ff.
- Livingston, John (1993), 'Corporate Tax Integration in the United States: A Review of the Treasury's Integration Study', **58** *Modern Law Review*, 717 ff.
- Long, Michael S. and Malitz, Ileen B. (1985), 'Investment Patterns and Financial Leverage', in Friedman, Benjamin (ed.), *Financing Corporate Capital Formation*, Chicago, University of Chicago Press.
- Lowenstein, Louis K. (1985), 'Management Buyouts', **85** *Columbia Law Review*, 730 ff.
- Ludwig, Matthias (ed.) (1993), *A Proposal for a Reform of the U.S. Corporate Income Tax System on the Basis of the Experiences with the Tax System of the Federal Republic of Germany*, American Graduate School of International Management.
- Luscombe, Mark A. (1995), 'The Transformation of Entity Classification', **73** *Taxes*, 562 ff.
- Lustig, Eric A. (1988), 'The Emerging Role of the Federal Tax Law in Regulating Hostile Corporate Takeover Defenses: The New Section 5881 Excise Tax on Greenmail', **40** *University of Florida Law Review*, 825-827.

- Lynch, Howell Jackson, Jr (ed.) (1991), *Effective Corporate Income Tax Rates and Their Relationship to Corporate Attributes: A Multidefinitonal, Multiperiod View*, Texas, A&M University.
- Lyon, Andrew B.R. (ed.) (1986), *How Do Stock Prices Change When Corporate Tax Laws Change?: An Empirical Analysis of the Effect of Tax Laws on the Value of the Firm*, Princeton University.
- Lyon, Andrew B.R. (1990), 'Investment Incentives under the Alternative Minimum Tax', **43** *National Tax Journal*, 451-465.
- Lyon, Andrew B.R. (1992), 'Tax Neutrality under Parallel Tax Systems', **20** *Public Finance Quarterly*, 338-358.
- Lyon, Andrew B.R. (ed.) (1997), *Cracking the Code: Making Sense of the Corporate Alternative Minimum Tax*, Washington, DC, Brookings Institution.
- Lyon, Andrew B.R. and Silverstein, Gerald (1995), 'The Alternative Minimum Tax and the Behavior of Multinational Corporations', in Feldstein, M., Hines, J.R.Jr and Hubbard, R.G. (eds), *The Effects of Taxation on Multinational Corporations*, Chicago: University of Chicago Press, 153-177.
- MacKie Mason, Jeffrey K. (1990), 'Do Taxes Affect Corporate Financing Decisions?', **45** *Journal of Finance*, 1471 ff.
- MacKie Mason, Jeffrey K. and Gordon, Roger H. (1997), 'How Much Do Taxes Discourage Incorporation?', **52** *Journal of Finance*, 2 ff.
- Majd, Saman and Myers, Stewart C. (1987), 'Tax Asymmetries and Corporate Tax Reform', in Feldstein, M. (ed.), *The Effects of Taxation on Capital Accumulation*, Chicago, University of Chicago Press.
- Maksimovic, Vojislav and Zechner, Josef (1991), 'Debt, Agency Costs, and Industry Equilibrium', **46(5)** *Journal of Finance*, 1619-1643.
- Malcomson, James M. (1981), 'Corporate Tax Policy and the Service Life of Capital Equipment', **48(2)** *Review of Economic Studies*, 311-316.
- Mansfield, Edwin (1986), 'The R&D; Tax Credit and Other Technology Policy Issues', **76** *American Economic Review. Papers and Proceedings*, 191-197.
- Mansoorian, Arman (1995), 'Budget Deficits, Corporate Income Taxes, and the Current Account', **27** *Journal of Money, Credit, and Banking*, 378-388.
- Marovelli, Forrest D. and Moser, Beth (eds) (1990), *Effective Corporate Tax Rates: 1980-84*, Tax Analysts.
- Marsh, Paul (1982), 'The Choice Between Equity and Debt: An Empirical Study', **37** *Journal of Finance*, 121 ff.
- Martin, Cathie Jo (1989), 'Business Influence and State Power: The Case of U.S. Corporate Tax Policy', **17** *Politics and Society*.
- Martin, Cathie Jo (1993), 'Growth Strategies and Corporate Taxation: Politics as Cause and Effect', in Post, James E. (ed.), *Research in Corporate Social Performance and Policy. A Research Annual*, Greenwich, Conn. And London, JAI Press, 57-76.
- Martin, Cathie Jo (ed.) (1991), *Shifting the Burden: the Struggle over Growth and Corporate Taxation. American Politics and Political Economy Series Chicago and London*, Chicago, University of Chicago Press.
- Masulis, Ronald W. and Trueman, B. (1988), 'Corporate Investment and Dividend Decisions under Differential Personal Taxation', **23** *Journal of Financial and Quantitative Analysis*, 369-385.

- Maule, James Edward (1982), 'The Effect of Federal Income Tax Integration on State Tax Systems', *Tax Notes*, 99 ff.
- Mavraganis, George (1993), 'Corporate Income Tax Harmonization in the Nineties: European Community', **47(4)** *Bulletin for International Fiscal Documentation*, 220-225.
- Mayer, Colin (1986), 'Corporation Tax, Finance and the Cost of Capital', **153** *Review of Economic Studies*, 93 ff.
- McClure, Charles E., Jr (1975), 'The Case for Integrating the Income Taxes', **28** *National Tax Journal*, 257-258.
- McCutcheon, Maeve (1995), 'The Tax Incentives Applying to US Corporate Investment in Ireland', **26(2)** *Economic and Social Review*, 149-171.
- McFetridge, Donald G. (1992), 'Taxation and Its Impact on Market Structure: Comment', in Bird, R.M. and Mintz, J.M. (eds), *Taxation to 2000 and Beyond. Canadian Tax Paper*, Toronto, Canadian Tax Foundation, 263-268.
- McGee, Robert W. (1975), 'Investment Credit for Progress Expenditures Using Phase-In Rule', *Taxation for Accountants*, 250-251.
- McGee, Robert W. (1976a), 'Tax Impact of Debt v. Equity Financing', *Taxes*, 110-116.
- McGee, Robert W. (1976b), 'How to Handle Corporate Obligations that Are Issued at a Discount or Premium', *Monthly Digest of Tax Articles*, 64-69.
- McGee, Robert W. (1976c), 'The New Imputed Interest Rules: How They Work', *The Practical Accountant*, 63-67.
- McGee, Robert W. (1976d), 'How to Handle Corporate Obligations That Are Issued at a Discount or Premium', *Taxation for Accountants*, 48-50. Reprinted in *The Monthly Digest of Tax Articles*, 1976, 64-69.
- McGee, Robert W. (1977), 'Planning a Tax-Free Corporate Reorganization: Selecting the One Best Suite to a Client's Needs', *Taxation for Lawyers*, 36-41.
- McGee, Robert W. (1983), 'Deferred Taxation', *Bibliography, National Association of Accountants*.
- McGee, Robert W. (1984a), *The History of the Income Tax in the United States*, Occasional Paper, Deakin University, Australia, No. 69.
- McGee, Robert W. (1984b), 'Loophole of the Month', *CPA Digest*, 4 ff.
- McGee, Robert W. (1984c), 'Software Taxation: A New NAA Research Study', *Management Accounting*, 7071-7077.
- McGee, Robert W. (1984d), 'The Growth of the Deferred Tax Account', *Management Accounting*, 18 ff.
- McGee, Robert W. (1985a), *A Summary of Deferred Income Tax Studies Conducted in the United States and Canada*, Occasional Paper, Deakin University, Australia, No. 74.
- McGee, Robert W. (1985b), *Accounting for Software*, Dow Jones Irwin, 168 p.
- McGee, Robert W. (1985c), 'Developing Computer Technology With the Research Credit', *The Practical Lawyer*, 13-24.
- McGee, Robert W. (1985d), 'The 1985 Tax Simplification Act', **1** *Business Planning*, 14-17.
- McGee, Robert W. (1985e), 'Keeping Track of Fringe Benefits ... When To Tax and When Not To Tax', **1** *Controllers Quarterly*, 24-27.
- McGee, Robert W. (1985f), 'New IRS Regs on Company Cars Raise Taxes ... And Tempers', **1** *Controllers Quarterly*, 25-27.

- McGee, Robert W. (1985g), 'Computer Software and the Investment Tax Credit', *5 Computer Law Journal*, 347-362. Reprinted in *Accounting and Tax Aspects of Computer Software Manufacturing*, Praeger Publishing Company, 1987. Reprinted in *The Monthly Digest of Tax Articles*, 1985, 6-21.
- McGee, Robert W. (1985h), 'Computer Software and the Research Credit', *5 Computer Law Journal*, 363-378. Reprinted in *The Monthly Digest of Tax Articles*, 1985, 6-21; *Accounting and Tax Aspects of Computer Software Manufacturing*, Praeger Publishing Company, 1987.
- McGee, Robert W. (1985i), 'Financial and Tax Accounting for Computer Software', *7 Western New England Law Review*, 651-704. Reprinted in *Accounting for Data Processing Department Costs*, Greenwood Press, 1988.
- McGee, Robert W. (1985j), *A Guide To VEBA's and Funded Welfare Benefite Plans*, New Jersey, Prentice Hall, 32 p.
- McGee, Robert W. (1985k), *Employee Stock Ownership Plans: A guide te ESOPs Under The Latest Rules*, New Jersey, Prentice Hall, 44 p.
- McGee, Robert W. (1986a), *Capital Gains and Losses, Alternative Minimum Tax, Accounting Provisions, Prentice-Hall's Explanation of the Tax Reform Act of 1986*, New Jersey, Prentice Hall, 500 p.
- McGee, Robert W. (1986b), *How Tax Reform Would Affect Profit-Sharing*, New Jersey, Prentice Hall, 23 p.
- McGee, Robert W. (1986c), *The Corporate Alternative Minimum Tax*, National Association of Accountants.
- McGee, Robert W. (1986d), *Tax-Wise Executive Comensation Strategies*, New Jersey, Prentice Hall, 44 p.
- McGee, Robert W. (1986e), *International Revenue Service Special Enrollment Examination Questions and Answers*, New Jersey, Prentice Hall, 59 p.
- McGee, Robert W. (1986f), *How the New Tax Law Affects Business*, - National Association of Accountants.
- McGee, Robert W. (1987), *Accounting and Tax Aspects of Computer Software Manufacturing*, Praeger Publishing Company, 162 p.
- McGee, Robert W. (1996a), *Essays on Accounting, Taxation and Public Finance*, Dumont Institute for Public Policy Research. <http://ww.hili.com~dumontin>
- McGee, Robert W. (1996b), *Taxation, Ethics and Public Policy*, Dumont Institute for Public Policy Research. <http://ww.hili.com~dumontin>
- McIntyre, Michael J. (1986), 'Toward a Fairer and Less Complicated Foreign Tax Credit System', *Tax Notes*, 1269 ff.
- McIntyre, Michael J. (1989), *The International Income Tax Rules of the United States*. 1995
- McIntyre, Michael J. (1996), 'Separate Basket Limitations in Theory and in Practice', *Tax Notes*.
- McIntyre, Robert S. and Folen, Robert (1984), *Corporate Income Taxes in the Reagan Years*, Washington DC, Citizens for Tax Justice.
- McIntyre, Robert S. and Wilhelm, David (eds) (1986), 'Money for Nothing: The Failure of Corporate Tax Incentives 1981-84'.
- McKenzie, Kenneth J. (1994), 'The Implications of Risk and Irreversibility for the Measurement of Marginal Effective Tax Rates on Capital', *27(3) Canadian Journal of Economics*, 604-619.

- McKenzie, Kenneth J. and Mintz, Jack M. (1992), 'Tax Effects on the Cost of Capital', in Shoven, John B. and Whalley, John (eds), *Canada-U.S. Tax Comparisons. A National Bureau of Economic Research Project Report*, Chicago, University of Chicago Press, 189-216.
- McLure, Charles E., Jr (1975a), 'The Case for Integrating the Income Taxes', **28** *National Tax Journal*, 255 ff.
- McLure, Charles E., Jr (1975b), 'Integration of the Personal and Corporate Income Taxes: The Missing Element in Recent Tax Reform Proposals', **88** *Harvard Law Review*, 532 ff.
- McLure, Charles E., Jr (1976), 'Integration of the Income Taxes: Why and How', **2** *Journal of Corporate Taxation*, 458 ff.
- McLure, Charles E., Jr (1977), 'Integrating the Income Taxes: How to Do it Right', *Tax Notes*, 3 ff.
- McLure, Charles E., Jr (1978), 'A Status Report on Tax Integration in the United States', **31** *National Tax Journal*, 313 ff.
- McLure, Charles E., Jr (1980), 'International Aspects of Dividend Relief', **7** *Journal of Corporate Taxation*, 137 ff.
- McLure, Charles E., Jr (1980), 'The State Corporate Income Tax: Lambs in Wolves' Clothing', in Aaron, Henry, J. And Boskins, Michael J. (eds), *The Economics of Taxation*, Washington, Brookings Institution, 345 ff.
- McLure, Charles E., Jr (1981), 'The Elusive Incidence of the Corporate Income Tax: The State Case', **9** *Public Finance Quarterly*, 4 ff.
- McLure, Charles E., Jr (1984), 'Corporate Income Tax: Restoration, Integration, or Elimination?', in Moore, J. (ed.), *To Promote Prosperity: U.S. Domestic Policy in the Mid-1980s*, 303-318.
- McLure, Charles E., Jr (1989), 'European Integration and Taxation of Corporate Income at Source: Lessons from the U.S.', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey., *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- McLure, Charles E., Jr (ed.) (1979), *Must Corporate Income be Taxed Twice?*, Washington, Brookings Institution.
- McLure, Charles E., Jr (ed.) (1984), *The State Corporation Income Tax : Issues in Worldwide Unitary Combination*, Stanford, Hoover Institute Press, Stanford University.
- McLure, Charles E., Jr (ed.) (1986), 'Economic Perspectives on State Taxation of Multijurisdictional Corporations'.
- McLure, Charles E., Jr and Mieszkowski, Peter (1983), 'Tax Exporting and the Commerce Clause', in McLure, Charles E., Jr and Mieszkowski, Peter (eds), *Fiscal Federalism and the Taxation of Natural Resources*, 169 ff.
- McLure, Charles E., Jr and Surrey, Stanley S. (1977), 'Integration of Income Taxes - Issues for Debate', **55** *Harvard Business Review*, 169 ff.
- McLure, Charles E., Jr, Mutti, Jack, Thuronyi, Victor and Zodrow, George R. (eds) (1990), *The Taxation of Income From Business and Capital in Colombia*, Chapel Hill, Duke University.
- McNulty, John K. (1983), 'Integrating the Corporate Income Tax?', **31** *American Journal of Comparative Law*, 661-666.

- McNulty, John K. (1990), 'Reform of the Individual Income Tax by Integration of the Corporate Income Tax', **46** *Tax Notes*, 1445 ff.
- McNulty, John K. (1992), 'Commentary, Preserving the Virtues of Subchapter S in an Integrated World', **47** *Tax Law Review*, 681 ff.
- McNulty, John K. (1994), 'Corporate Income Tax Reform in the United States: Proposals for Integration of the Corporate and Individual Income Taxes, and International Aspects', **12** *International Tax & Business Lawyer*, 161 ff.
- Meade, James E. (ed.) (1978), *The Taxation of Corporate Reorganizations: How Are We Doing So Far?*, London, Allen and Unwin.
- Meier, Donald L. (1991), 'Europe in 1992: A U.S. Tax Perspective, Sara Lee Corporation', **45** *Bulletin for International Fiscal Documentation*, 328-331.
- Merski, Paul G. (ed.) (1990), *The Corporate Tax Burden*, Washington, DC, Brookings Institution.
- Michaely, Roni (1991), 'Ex-dividend Day Stock Price Behavior: The Case of the 1986 Tax Reform Act', **46** *Journal of Finance*, 845-859.
- Michaely, Roni and Murgia, Maurizio (1995), 'The Effect of Tax Heterogeneity on Prices and Volume around the Ex-dividend Day: Evidence from the Milan Stock Exchange', **8** *Review of Financial Studies*, 369-399.
- Michaely, Roni and Murgia, Maurizio (1997), 'Fiscalità e Mercato Azionario: Come Interpretare lo Stacco dei Dividendi dei Titoli Italiani? (Dividends and Taxes in the Italian Stock Market. Evidence from the Ex-Dividend Day Behavior)', **13** *Politica Economica*, 117-152.
- Mieszkowski, Peter M., 'Integration of the Corporate and Personal Income Taxes: The Bogus Issue of Shifting', **31** *Finanzarchiv*, 286-297.
- Mieszkowski, Peter M. (1969), 'Tax Incidence Theory: the Effects of Taxes on the Distribution of Income', **7** *Journal of Economic Literature*, 1103 ff.
- Mieszkowski, Peter M. and Zodrow, George R. (1985), 'The Incidence of a Partial State Corporate Income Tax', **38** *National Tax Journal*, 4 ff.
- Miller, Merton H. (1977), 'Debt and Taxes', **32** *Journal of Finance*, 261-275.
- Miller, Merton H. (1982), *The Corporation Income Tax and Corporate Financial Policies*, New Jersey, Prentice Hall.
- Miller, Merton H. (1986), 'Behavioral Rationality in Finance: The Case of Dividends', **59** *Journal of Business*, 451-468.
- Miller, Merton H. (1988), 'The Modigliani-Miller Propositions After Thirty Years', **2** *Journal of Economic Perspectives*, 99-120.
- Miller, Merton H. and Modigliani, Franco (1961), 'Dividend Policy, Growth and the Valuation of Shares', **34** *Journal of Business*, 41 ff.
- Miller, Merton H. and Rock, Kevin (1985), 'Dividend Policy Under Asymmetric Information', **40** *Journal of Finance*, 103 ff.
- Miller, Merton H. and Scholes, Myron S. (1979), 'Dividends and Taxes', **6** *Journal of Financial Economics*, 1118-1141.
- Miller, Merton H. and Scholes, Myron S. (1982), 'Dividends and Taxes: Some Empirical Evidence', **90** *Journal of Political Economy*, 1118-1141.
- Minarik, Joseph J. (1984), 'The Effects of Taxation on the Selling of Corporate Stock and the Realization of Capital Gains: Comment', **99** *Quarterly Journal of Economics*, 93 ff.

- Mintz, Jack M. (1976), 'Is there a Future for Capital Income Taxation?', **24** *Canadian Tax Journal*, 1469-1503.
- Mintz, Jack M. (1987a), *Alternative Views of the Corporate Tax: A Reassessment of the Carter Report Twenty Years Later*, Department of Economics, Queen's University, Queen's Institute for Economic Research, 56.
- Mintz, Jack M. (1987b), *An Empirical Estimate of Corporate Tax Refundability and Effective Tax Rates*, Department of Economics, Carleton University, Carleton Industrial Organization Research Unit, 87-02.
- Mintz, Jack M. (1988), 'An Empirical Estimate of Corporate Tax Refundability and Effective Tax Rates', **103(1)** *Quarterly Journal of Economics*, 225-231.
- Mintz, Jack M. (1990), 'Corporate Tax Holidays and Investment', **4(1)** *World Bank Economic Review*, 81-102.
- Mintz, Jack M. (1991), 'Economic Implications of Non-Refundability of Tax Losses', in X (ed.), *4 Policy Options for the Treatment of Tax Losses*, Toronto, Clarkson Gordon Foundation, 1-43.
- Mintz, Jack M. (1995), 'The Corporation Tax: A Survey', **16** *Fiscal Studies*, 23-68.
- Mintz, Jack M. and Tsiopoulos, Thomas (1992), 'Contrasting Corporate Tax Policies: Canada and Taiwan', **40** *Canadian Tax Journal*, 902 ff.
- Mintz, Jack M. and Tsiopoulos, Thomas (1994), 'The Effectiveness of Corporate Tax Incentives for Foreign Investment in the Presence of Tax Crediting', **55(2)** *Journal of Public Economics*, 233-255.
- Moden, Karl, Markus (ed.) (1993), 'Tax Incentives of Corporate Mergers and Foreign Direct Investments', Ph.D. Thesis.
- Moden, Karl, Markus (ed.) (1993), *Tax Incentives of Corporate Mergers and Foreign Direct Investments, Ph.D. Dissertation*, University of Pennsylvania.
- Modigliani, Franco (1982), 'Debt, Dividend Policy, Taxes, Inflation, and Market Valuation', **37** *Journal of Finance*, 255-273.
- Modigliani, Franco and Miller, Merton H. (1961), 'Dividend Policy, Growth, and the Valuation of Shares', **34** *Journal of Business*, 411 ff.
- Modigliani, Franco and Miller, Merton H. (1963), 'Corporate Income Taxes and the Cost of Capital: A Correction', **53** *American Economic Review*, 433 ff.
- Morgan, Eleanor J. (1987), 'The UK Corporate Tax Reform and Business Investment Decisions', **8(2)** *Managerial and Decision Economics*, 149-159.
- Morgan, I.G. (1982), 'Dividends and Capital Asset Prices', **37** *Journal of Finance*, 1071 ff.
- Mundstock, G. (1988), 'Taxation of Intercorporate Dividends Under an Unintegrated Regime', **44** *Tax Law Review*, 1 ff.
- Musgrave, Peggy B. (1974), 'International Tax Base Division and the Multinational Corporation', **27** *Journal of Public Finance*, 394 ff.
- Musgrave, Peggy B. (1987), 'Interjurisdictional Coordination of Capital Income', in Clossen, S. (ed.), *Tax Coordination In The European Community*, London, Kluwer Law and Taxation.
- Mutén, Leif (1997), 'Dual Income Tax: The Scandinavian Experience', in Head, G. and Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 271-285.
- Mutti, John H. (1981), 'Tax Incentives and Repatriation Decisions of US Multinational Corporations', **34** *National Tax Journal*, 241-248.

- Mutti, John H. and Grubert, Harry (eds) (1984), *Corporate and Personal Taxation of Capital Income in an Open Economy*, Washington, DC, Office of Tax Analysis, U.S. Treasury Dept..
- Mutti, John H. and Grubert, Harry (1985), 'The Taxation of Capital Income in an Open Economy: The Importance of Resident-Nonresident Tax Treatment', **27** *Journal of Public Economics*, 291-309.
- Myers, Stewart C. (1984), 'The Capital Structure Puzzle', **39** *Journal of Finance*, 575-592.
- Myers, Stewart C. (1993), 'Still Searching for Optimal Capital Structure', **6** *Journal of Applied Corporate Finance*, 4-14.
- Nadeau, Serge and Strauss, Robert P. (1991), 'Tax Policies and the Real and Financial Decisions of the Firm: The Effects of the Tax Reform Act of 1986', **19** *Public Finance Quarterly*, 251-292.
- Nadeau, Serge J. (1988), 'A Model to Measure the Effects of Taxes on the Real and Financial Decisions of the Firm', **41** *National Tax Journal*, 467-481.
- Nadeau, Serge J. and Strauss, Robert P. (1993), 'Taxation, Equity, and Growth: Exploring the Trade-off Between Shareholder Dividend Tax Relief and Higher Corporate Income Taxes', **6** *National Tax Journal*, 161-172.
- Nadeau, Serge J. and Strauss, Robert P. (1993), 'Taxation, Equity, and Growth: Exploring the Trade-Off Between Shareholder Dividend Tax Relief and Higher Corporate Income Taxes, U Victoria; Carnegie Mellon U', **46** *National Tax Journal*, 161-175.
- Nadeau, Serge J. and Strauss, Robert P. (1997), 'Observations on US Corporate Tax Policy and the 1992 US Treasury Report on Integration', in Head, G. and Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 85-114.
- Narayanan, Suresh (1989), 'Forward Shifting of the Corporate Tax in the Presence of Competing Imports: A Note', **44(2)** *Public Finance*, 320-326.
- Neville, Norman (1985), 'The Economics of Tax Ploision and Corporate Tax Integration', **2** *Australian Tax Forum*, 71-77.
- Newberry, Kaye J. (ed.) (1994), *Foreign Tax Credit Limitations and Public Issuances by U.S. Multinationals: New Evidence of Tax Clienteles*, Thesis, Arizona State University.
- Normadin, Charles P. (1989), 'A Legal Perspective (Discussion)', in Peters, Richard T. and Scott, Robert E. (eds), *Are the Distinctions Between Debt and Equity Disappearing? Proceedings of a conference held at Melvin Village*, New Hampshire Federal Reserve Bank of Boston.
- Norr, M. (1982), *The Taxation of Corporations and Shareholders*.
- Norregaard, John and Owens, Jeffrey (1992), 'Taxing Profits in a Global Economy: International', **46(5)** *Bulletin for International Fiscal Documentation*, 223-228.
- Note (1995), 'Losing Control: Toward a New Understanding of the Taxation of Post-Incorporation Stock Sales', **108** *Harvard Law Review*, 1661 ff.
- Ofer, Aharon, R. and Siegel, Daniel R. (1987), 'Corporate Financial Policy, Information, and Market Expectations: an Empirical Investigation of Dividends', **42** *Journal of Finance*, 889 ff.
- Officer, Robert R. (1990), *The Australian Imputation System for Company Tax and Its Likely Effect on Shareholders, Financing and Investment Australian Tax Forum*.
- Officer, Robert R. (1994), 'The Cost of Capital of a Company under an Imputation Tax System', 1-17.

- Olin, John M. (ed.) (1990), *Taxation and the Cost of Capital: The 'Old' View, the 'New' View, and Another View*.
- Omer, Thomas C. and Ziebart, David A. (1993), 'The Effect of the Alternative Minimum Tax on Corporate Tax Burdens', **33(2)** *Quarterly Review of Economics and Finance*, 123-139.
- Omer, Thomas C., Molloy, Karen H. and Ziebart, David A. (1991), 'Measurement of Corporate Tax Rates Using Financial Statement Information', *Journal of the American Taxation Association*, 57-72.
- Ono, Yoshiyasu and Shibata, Akihisa (1992), 'Spill Over Effects of Supply Side Changes in a Two Country Economy with Capital Accumulation', **33(12)** *Journal of International Economics*, 127-146.
- Osterberg, William P. (1989), 'Tobin's q, Investment, and the Endogenous Adjustment of Financial Structure', **40(3)** *Journal of Public Economics*, 293-318.
- Parai, Amar K. (1988), 'The Incidence of Corporate Income Tax under Variable Returns to Scale', **43(3)** *Public Finance*, 414-424.
- Parai, Amar K. (1991), 'The Incidence of Corporate Income Tax under Variable Returns to Scale: Reply', **46** *Public Finance*, 337-338.
- Parai, Amar K. and Choudhary, Munir A.S. (1992), 'Imperfect Labor Mobility and Corporate Tax Incidence', **6(3)** *International Economic Journal*, 75-82.
- Pastor, Santos (1991), 'Comment (on Aretz, Taxation and Incorporation)', in Weigel, Wolfgang (ed.), *Economic Analysis of Law - A Collection of Applications*, Vienna, Österreichischer Wirtschaftsverlag, 133-134.
- Pearson, Mark (1989), 'Corporate Tax Harmonisation in the European Community', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Pedersen, Bente Moll (1994), 'Denmark: Joint Taxation: A Unique Way of Reducing Corporate Tax', **48(11)** *Bulletin for International Fiscal Documentation*, 574-578.
- Peel, Fred W. (1985), 'A Proposal for Eliminating Double Taxation of Corporate Dividends', **39** *Tax Law Journal*, 29 ff.
- Pender, Howard (1997), 'Company Tax in Australia', in Head, G. and Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 195-206.
- Pereira, Alfredo M. (ed.) (1989), *Corporate Tax Integration in the United States: A Dynamic General Equilibrium Analysis*, San Diego, of California.
- Pereira, Alfredo M. (1993), 'A Dynamic General Equilibrium Analysis of Corporate Tax Integration', **15(1)** *Journal of Policy Modeling*, 63-89.
- Peroni, Robert J. (1997), 'Back to the Future: A Path to Progressive Reform of the U.S. International Income Tax Rules', **51** *University of Miami Law Review*, 975 ff.
- Petersen, Dorothy Ann (ed.) (1993), *D Average Tax Rates Matter for Corporate Investment?*, Northwestern University Press.
- Peterson, George E. (1985), 'Direct Evidence on the Marginal Rate of Taxation on Dividend Income', **14** *Journal of Financial Economics*, 272-280.
- Petit, R.R. (1977), 'Taxes, Transaction Costs and the Clientele Effects of Dividends', *Journal of Financial Economics*, 419-436.
- Picciotti, Sol (ed.) (1992), *International Business Taxation: A Study in the Internationalization of Business Regulation*.

- Plasmans, J. and Vanneste, J. (1991), 'The Incidence of Corporate Taxation in Belgium on Employment and Investment', **0** *Cahiers Economiques de Bruxelles*, 3-25.
- Platt, Joseph S. (1947), 'Integration and Correlation - The Treasury Proposal', **3** *Tax Law Review*, 59 ff.
- Plesko, George A. (1994), 'Corporate Taxation and the Financial Characteristics of Firms', **22** *Public Finance Quarterly*, 311 ff.
- Plumb, W.T. (1971), 'The Federal Income Tax Significance of Corporate Debt: A Critical Analysis and A Proposal', **26** *Tax Law Review*, 359 ff.
- Polito, Anthony P. (1989), 'Note, A Proposal for an Integrated Income Tax', **12** *Harvard Journal of Law and Public Policy*, 1009 ff.
- Pomp, Richard D. (1993), 'The Disclosure of State Corporate Income Tax Data: Turning the Clock Back t the Future', **22** *Capital University Law Review*, 373 ff.
- Porteba, James M. (1987), 'How Burdensome ae Capital Gains Taxes?: Evidence from the United States', **33** *Journal of Public Economics*, 157 ff.
- Porteba, James M. (1987), 'Tax Policy and Corporate Saving', **2** *Brookings Papers on Economic Activity*, 455-515.
- Porteba, James M. (1991), 'Dividends, Capital Gains, and the Corporate Veil: Evidence from Britain, Canada, and the United States', in Bernheim, B. Douglas and Shoven, John B. (eds) *National Saving and Economic Performance*, Chicago, University of Chicago Press, 49-71.
- Porteba, James M. (1992), 'Why Didn't the Tax Reform Act of 1986 Raise Corporate Taxes?', in X (ed.), *Tax Policy and the Economy*, Cambridge and London, MIT Press, Cambridge, Mass. National Bureau of Economic Research, 43-58.
- Porteba, James M. and Summers, Lawrence H. (1983), 'Dividends, Taxes, Corporate Investment, and "Q"', **22** *Journal of Public Economics*, 135-167.
- Porteba, James M. and Summers, Lawrence H. (1984), 'New Evidence that Taxes Affect the Valuation of Dividends', **39** *Journal of Finance*, 1397-1415.
- Porteba, James M. and Summers, Lawrence H. (1985), 'The Economic Effects of Dividend Taxes', in Altman Edward and Subrahmanyam Marti (eds), *Recent Advances in Corporate Finance*, Homewood: Richard D. Irwin, 227-284.
- Posin, Daniel Q. (1985), 'Taxing Corporate Reorganizations: Purging Penelope's Web', **133** *University of Pennsylvania Law Review*, 1381-1382.
- Pozdena, Randall Johnston (1987), 'Tax Policy and Corporate Capital Structure', **4** *Economic Review*.
- Quirnbach, Herman C., Swenson, Charles W. and Vines, Cynthia Carol (1996), 'An Experimental Examination of General Equilibrium Tax Incidence', **61** *Journal of Public Economics*, 337-358.
- Rajagopal, Dagmar (ed.) (1987), *The Corporate Income Tax and the User Cost of Capital a New Method to Test for Short-run Forward Shifting of the Tax*, Ph.D. Thesis, Toronto, University of Toronto Faculty of Law.
- Rands, William J. (1995), 'Passthrough Entities and Their Unprincipled Differences Under Federal Tax Law', **49** *SMU Law Review*, 15 ff.
- Rangazas, Peter and Dewan, Abdullah (1987), 'Taxes and the Corporate Sector Debt Ratio: Some Time Series Evidence', **69** *Review of Economics and Statistics*, 357 ff.
- Rapanos Vassilis T. (1991), 'The Incidence of Corporate Income Tax under Variable Returns to Scale: Comment', **46** *Public Finance*, 335-336.

- Razin, Assaf and Sadka, Efraim (1990), 'Integration of International Capital Markets: The Size of Government and Tax Coordination', in Razin and Slemrod, Joel (eds), *Taxation in the Global Economy*, Chicago: University of Chicago Press.
- Reamonn, Sean (ed.) (1970), *The Philosophy of the Corporate Tax*, Dublin.
- Reaume, David M. (1976), 'Short Run Corporate Tax Shifting by Profit Maximizing Oligopolists', **4(1)** *Public Finance Quarterly*, 33-44.
- Repetti, James R. (1990), 'Long-Term Capital Gains, the Long-Term Investment Perspective, and Corporate Productivity', **49** *Tax Notes*, 85 ff.
- Repetti, James R. (1992), 'Corporate Governance and Stockholder Abdication: Missing Factors in Tax Policy Analysis', **67** *Notre Dame Law Review*, 983-984.
- Repetti, James R. (1997), 'Accounting and Taxation: the Misuse of Tax Incentives to Align Management-Shareholder Interests', **19** *Cardozo Law Review*, 697 ff.
- Ribstein, Larry E. (1988), 'An Applied Theory of Limited Partnership', **37** *Emory Law Journal*, 852-854.
- Ribstein, Larry E. (1992), 'The Deregulation of Limited Liability and the Death of Partnership', **70** *Washington United Law Quarterly*, 471 ff.
- Rice, Eric M. (ed.) (1990), *Eric M. Skirting the Law: Essays on Corporate Tax Evasion and Avoidance*, Ph.D. Thesis, Harvard University Press.
- Ritter, Wolfgang (1989), 'Harmonisation of Taxes as a Prerequisite for a Single European Market', in Gammie, Malcolm, Robinson, Bill and Fitchew, Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Robichek, Alexander and Myers, Eugene A. (1966), 'Stewart Problems in the Theory of Optimal Capital Structure', **1** *Journal of Financial and Quantitative Analysis*, 1-35.
- Rocap and Waimon (1989), 'Passthrough Rules for Financial Intermediaries: Different Routes to a Single Tax', **67** *Taxes*, 1025 ff.
- Rodios, Nikos D. (1986), 'E Kampyle tou Laffer e Peri tes Phthinousas Apodoseos tes Phorologias (The Laffer Curve or On the Diminishing Return of Taxation)', **53** *Ephemeris ton Hellenon Nomikon*, 216-218.
- Rogers, Diane, Lim (ed.) (1996), 'The Incidence of the Corporate Income Tax', *Congressional Office Paper*.
- Roin, Julie, A. (1988), 'United They Stand, Divided They Fall: Public Choice Theory and the Tax Code', **74** *Cornell Law Review*, 62 ff.
- Roin, Julie, A. (1995), 'Rethinking Tax Treaties in a Strategic World with Disparate Tax Systems', **81** *Virginia. Law Review*, 1753 ff.
- Ronen, Joshua and Aharoni, A. (1989), 'The Choice among Accounting Alternatives and Management Compensation: Effects of Corporate Tax', **64(1)** *Accounting Review*, 69-86.
- Rooijen, Martin J. (1977), 'Interrelationship of Corporate Tax and Income Tax of Shareholders', **31** *Bulletin for International Fiscal Documentation*, 64-68.
- Rose-Ackerman, Susan (1982), 'Unfair Competition and Corporate Income Taxation', **34** *Stanford Law Review*, 1017-1039. Reprinted In Rose Ackerman (ed.), *The Economics of Nonprofit Institutions*, pp. 394-414.
- Rousslang, Donald J. (1987), 'The Effects of Recent Corporate Tax Changes on U.S. International Trade', **40(4)** *National Tax Journal*, 603-615.
- Rozycki, John J. (1997), 'A Tax Motivation for Smoothing Dividends', **37** *Quarterly Review of Economics and Finance*, 563-578.

- Rudnick, Rebecca S. (1988), 'Who Should Pay the Corporate Tax in a Flat Tax World?', **39** *Case Western Reserve Law Review*, 965 ff.
- Rudnick, Rebecca S. (1989), 'Corporate Tax Integration: Liquidity of Investment', **42** *Tax Notes*, 1107 ff.
- Sadowitz, March (ed.) (1992), *Corporate Tax Policy: a Factor in Environmental Decision Making*, Thesis, Albany, State University of New York Press.
- Sahni, Balbir Singh and Mathew, T. (eds) (1976), *The Shifting and Incidence of the Corporation Income Tax*, Rotterdam University Press.
- Salinger, Michael A. and Summers, Lawrence H. (eds) (1981), *Tax Reform and Corporate Investment: a Micro-econometric Simulation*, National Bureau of Economic Research, 757.
- Sandberg, Milton (1938), 'The Income Tax Subsidy to "Reorganizations"', **38** *Columbia Law Review*, 98 ff.
- Sanden, B. Kenneth (1975), 'The Taxation of Income from Corporate Shareholding: Introductory Remarks', **28** *National Tax Journal*, 255 ff.
- Sansing, Richard C. (1993), 'Information Acquisition in a Tax Compliance Game', *Accounting Review*, 874-884.
- Sarma, J.V.M. (1990), '1990-91 Budget and the New Corporate Tax Proposals: An Evaluation: India', **44(7)** *Bulletin for International Fiscal Documentation*, 347-349.
- Sasseville, Jacques (ed.) (1995), 'Article 10 of the OECD Model Tax Convention and the Different Approaches to Integration in International Fiscal Association. International taxation of dividends reconsidered in light of corporate tax integration', Proceedings of a seminar organised jointly with the EOCD in Toronto in 1994 during the 48th Congress of the International Fiscal Association.
- Sato, Mitsuo and Bird, Richard M. (1975), 'International Aspects of the Taxation of Corporations and Shareholders', **22** *International Monetary Fund Staff Papers*, 384-455.
- Scarborough, Robert H. (1993), 'Risk, Diversification and the Design of Loss Limitations Under a Realization-Based Income Tax', **48** *Tax Law Review*, 677 ff.
- Schadewald, Michael S. (1992), 'Discussion of Expertise in Corporate Tax Planning: The Issue Identification Phase', **30(0)** *Journal of Accounting Research*, 29-36.
- Schaffer, Daniel C. (1979), 'The Income Tax on Intercorporate Dividends', **33** *Tax Lawyer*, 161 ff.
- Schenk, Deborah H. (1992), 'Complete Integration in a Partial Integration World', **47** *Tax Law Review*, 697 ff.
- Schipper, Katherine and Smith, Abbie (1988), *Corporate Income Tax Effects of Management Buyouts*.
- Schler, Michael L. (1992), 'Taxing Corporate Income Once (or Hopefully Not at All): A Practitioner's Comparison of the Treasury and ALI Integration Models', **47** *Tax Law Review*, 509 ff.
- Scholes, Myron S. and Wolfson, Mark, Alan (1980), 'Employee Stock Ownership Plans and Corporate Restructuring: Myths and Realities', in Samets, Arnold W. and Bicksler, James L. (eds), *The Battle for Corporate Control: Shareholder Rights, Stakeholder Interest, and Managerial Responsibilities*.
- Scholes, Myron S. and Wolfson, Mark, Alan (1990), 'The Effects of Change in Tax Laws on Corporate Reorganization Activity', **63** *Journal of Business*, 141-164.

- Scholes, Myron S. and Wolfson, Mark Alan (1990), 'The Effects of Changes in Tax Laws on Corporate Reorganization Activity', **63(S)** *Journal of Business*, 141-164.
- Scholes, Myron S. and Wolfson, Mark, Alan (1991), 'The Role of Tax Rules in the Recent Restructuring of U.S. Corporations, in D. Bradford', **5** *Tax Policy and the Economy*, 1-25.
- Scholes, Myron S. and Wolfson, Mark, Alan (eds) (1992), *Taxes and Business Strategy: A Planning Approach*, Englewood Cliffs, NJ, Prentice-Hall.
- Scholes, Myron S., Wilson, Peter G. and Wolfson, Mark Alan (1992), 'Firms' Responses to Anticipated Reductions in Tax Rates', **30** *Journal of Accounting Research*, 161-185.
- Scholz, John Karl (1988), *The Effect of the Relative Tax Treatment of Dividends and Capital Gains on Corporate Valuation and Behavior, Ph.D. Dissertation*, Stanford University.
- Schulman, Graig T., Thomas, Deborah W., Sellers, Keith F. and Kennedy, Duane (1996), 'Effects of Tax Integration and Capital Gains Tax on Corporate Leverage', **49** *National Tax Journal*, 31-54.
- Schultz, Michael L. (1990), 'Section 382 and the Pursuit of Neutrality in the Treatment of Net Operating Loss Carryovers', **39** *University of Kansas Law Review*, 84 ff.
- Schwidetzky, Walter D. (1995), 'A Comparison of Partnership Income Taxation in the United States and Germany: A Study in Differences', **10** *American University Journal of International Law and Policy*, 1331 ff.
- Seidl, Christian (1989), 'Betriebssteuer und Neutralität (On the Neutrality of a Business Tax)', **66/4** *Steuer und Wirtschaft*, 350-357.
- Sellers, Keith F., Thomas, Deborah W. and Schulman, Craig T. (eds) (1994), *Effects of Tax Policy on Corporate Financing Decisions: Integration of the Corporate and Personal Income Tax*, Washington, DC, Tax Foundation and Ernst & Young.
- Senate Finance Committee Staff (ed.) (1983), *The Reform and Simplification of the Income Taxation of Corporations*, Washington, DC, United States G.P.O.. Preliminary Report of the Staff of the Senate Finance Committee, 'Corporate Tax Study', issued September 27, 1983, by Commerce Clearing House, Chicago no. 45 (Oct. 6, 1983)
- Shaikh, Abdul Quader J. (1971), *The Corporate Income Tax and the Growth of the Corporate Sector: a Case Study of India, Ph.D. Thesis*, University of Massachusetts.
- Shakow, David J. (1990), 'Wither, C!', **45** *Tax Law Review*, 177 ff.
- Shapiro, Robert J. (1997), 'Building a Conceptual Baseline for Corporate Tax Reform', **50** *National Tax Journal*, 507-517.
- Sharpe, Donald (1996), 'Unfair Business Competition and the Tax on Income Destined for Charity: Forty Six Years Later', **3** *Florida Tax and Law Review*, 367 ff.
- Shaviro, Daniel N. (1992), 'An Efficiency Analysis of Realization and Recognition Rules Under the Federal Income Tax', **48** *Tax Law Review*, 53 ff.
- Shaviro, Daniel N. (1995), 'Risk-Based Rules and the Taxation of Capital Income', **50** *Tax Law Review*, 643-724.
- Shay, Steven E. (1996), 'Revisiting U.S. Anti-Deferral Rules', **74** *Taxes*, 1042 ff.
- Sheffrin, Steven M. (1982), 'What Have We Done to the Corporate Tax System?', **25(2)** *Challenge*, 46-52.
- Shefrin, Hersch M. and Statman, Meir (1984), 'Explaining Investor Preference for Cash Dividends', **13** *Journal of Financial Economics*, 253 ff.

- Sheppard, Lee A. (1985), 'Corporate Tax Integration, the Proper Way to Eliminate the Corporate Tax', *27 Tax Notes*, 637 ff.
- Shevlin, Terry (1990), 'Estimating Corporate Marginal Tax Rates', *Journal of the American Taxation Association*.
- Shim, Ki-Ryon (1976), *The Shifting of the Corporation Income Tax in Japanese Manufacturing*, Ph.D. Thesis, University of Cincinnati.
- Shnaider, Eliahu (1987), 'The Use of Fuzzy Set Theory for Forecasting Corporate Tax Revenue', M.S. Thesis.
- Shome, Parthasarathi (1982), 'Corporate Tax Shifting: Empirical Evidence from ASEAN', *4 Papers in Asian Studies*.
- Shome, Parthasarathi (1985), 'Is the Corporate Tax Shifted? Empirical Evidence from ASEAN', *13(1) Public Finance Quarterly*, 21-46.
- Shoven, John B. (1976), 'The Incidence and Efficiency Effects of Taxes on Income from Capital', *84 Journal of Political Economy*, 1261 ff.
- Shoven, John B. (1986), *New Developments in Corporate Finance and Tax Avoidance: Some Evidence*, National Bureau of Economic Research, 2091.
- Shoven, John B. (1987), 'The Tax Consequences of Share Repurchases and Other Non-Dividend Cash Payments to Equity Owners', in Summers, Lawrence H. (ed.), *Tax Policy and the Economy*, Cambridge, MIT Press, 29-54.
- Shoven, John B. (ed.), 'Using the Corporate Cash Flow Tax to Integrate Corporate and Personal Taxes', Proceedings of the 83rd Annual Conference of the National Tax Association, 19-26.
- Shoven, John B. (ed.) (1990), *The Japanese Tax Reform and the Effective Rate of Tax on Japanese Corporate Investments*, Stanford University, Center for Economic Policy Research, 147.
- Shoven, John B. and Waldfogel, Joel (eds) (1990), 'Introduction and Summary', in Shoven, John B. and Waldfogel, Joel (eds), *In Debt, Taxes, and Corporate Restructuring*, Washington, Brookings Institution, 1-19.
- Shoven, John B. and Whalley, John (1972), 'A General Equilibrium Calculation of the Effects of Differential Taxation of Income from Capital in the U.S.', *1 Journal of Public Economics*, 281 ff.
- Shoven, John B. and Whalley, John (eds) (1992), *Canada-U.S. Tax Comparisons, A National Bureau of Economic Research Project Report*, Chicago, University of Chicago Press.
- Shuldiner, Reed H. (1992), 'Corporate Integration: Do the Uncertainties Outweigh the Benefits?', *47 Tax Law Review*, 653 ff.
- Shum, Pauline M. (1996), 'Taxes and Corporate Debt Policy in Canada: An Empirical Investigation', *29 Canadian Journal of Economics*, 556-572.
- Siegel, Stanley (1995), 'The Effects of Tax Laws on the Choice of Organizational Form and Structure: A Comparison of Integrated and Nonintegrated Tax Systems', *29 International Lawyer*, 1-6.
- Siegfried, John J. (1972), *The Relationship Between Economic Structure and the Effect of Political Influence: Empirical Evidence from The Federal Corporation Income Tax Program*, Ph.D. Dissertation, Madison, Wisconsin University.
- Siegfried, John J. (1974), 'Effective Average U.S. Corporation Income Tax Rates', *27 National Tax Journal*, 245-259.

- Siegfried, John J. and Weiss, Leonard W. (1974), 'Advertising, Profits, and Corporate Taxes Revisited Review of Economics and Statistics', **56** *National Tax Journal*, 195-200.
- Simeone, Gary John (1994), *U.S. Corporate Tax Integration - Analysis of the Alternatives*, M.S. Thesis, San Francisco, State University.
- Simmons, Daniel L. (1983), 'Net Operating Losses and Section 382: Searching for a Limitation on Loss Carryovers', **63** *Tulane Law Review*, 1045 ff.
- Simon, Herbert A. (1972), 'Antitrust and the "Size" Problem: The "Graduated" Corporate Income Tax as an Anti-Bigness Device', **6** *Antitrust Law and Economics Review*, 53 ff.
- Simons, Henry C. (1938), *Personal Income Taxation*.
- Sinn, Hans-Werner (1990), *Taxation and the Birth of Foreign Subsidiaries*, National Bureau of Economics, 3519.
- Sinn, Hans-Werner (1991a), 'The Vanishing Harberger Triangle', **45** *Journal of Public Economics*, 271-300.
- Sinn, Hans-Werner (1991b), 'Taxation and the Cost of Capital: The Old View, the "New" View and Another View', **5** *Tax Policy and the Economy*, 25-54.
- Sinn, Hans-Werner (1991c), 'Share Repurchases, the "New" View, and the Cost of Capital', **36** *Economic Letters*, 187-190.
- Sinn, Hans-Werner (1993), 'Taxation and the Birth of Foreign Subsidiaries', in Herberg, H. and Long, N.V. (eds), *Trade Welfare, and Economic Policies: Essays in Honor of Murray C Kemp*, Ann Arbor: University of Michigan Press, 325-352.
- Slawson (1967), 'Taxing as Ordinary Income the Appreciation of Publicly Held Stock', **76** *Yale Law Journal*, 623 ff.
- Slemrod, Joel (1990), 'The Impact of the Tax Reform Act of 1986 on Foreign Direct Investment To and From the United States', in Slemrod, J. (ed.), *Do Taxes Matter?*, Cambridge, MA, MIT Press.
- Slemrod, Joel (1990), 'Tax Effects on Foreign Direct Investment in the United States: Evidence from a Cross-Country Comparison', in Razin and Slemrod (eds), *Taxation in the Global Economy*, Chicago, University of Chicago Press.
- Slitor, Richard E. (1963), 'The Enigma of Corporate Tax Incidence', **18** *Public Finance*.
- Slitor, Richard E. (1966), 'Corporate Tax Incidence: Economic Adjustments to Differentials Under a Two-Tied Tax Structure', in Krzyzaniak, M. (ed.), *Effects of Corporation Income Tax*, Papers Presented at the Symposium on Business Taxation, 136-206.
- Sloan, Frank A. Et al. (1988), 'Cost of Capital to the Hospital Sector', **7(1)** *Journal of Health Economics*, 25-45.
- Smirlock, Michael Randolph and Beatty, Saman Majd (eds) (1986), *Taxes and Mergers: A Survey*, Salomon Brothers Center for the Study of Financial Institutions, New York, University Graduate School of Business Administration.
- Smith, Abbie (1990), 'The Effects of Leveraged Buyouts', **25(2)** *Business Economics*, 19-25.
- Smith, Andrew M.C. (1991), 'Corporate and International Tax Reforms in 1991 Budget: New Zealand', **45(11)** *Bulletin for International Fiscal Documentation*, 530-537.
- Smith, Andrew M.C. (1993), 'Comprehensive Dividend Imputation, Neutrality and Double Taxation of Corporate Profits: New Zealand', **47** *Bulletin for International Fiscal Documentation*, 568-580.

- Smith, Andrew M.C. (1994), 'Dividend Imputation and International Equity Investment: Unilateral Extension of Imputation to Non-Resident Investors', **11** *Australian Tax Forum*, 247-269.
- Smith, Dan Throop (1977), 'Relief From Double Taxation of Dividend Income', **55** *Harvard Business Review*, 87 ff.
- Smith, David Duane (ed.) (1979), *The Relationship Between Market Structure and the Effective Corporate Income Tax Rate*, Ph.D. Thesis, University of Michigan.
- Smith, Peter Jefferson (1989), 'Proposals to Date, and Aims for 1992', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Snoe, Joseph A. (1993), 'The Entity Tax and Corporate Integration: An Agency Cost Analysis and A Call for a Deferred Distributions Tax', *University of Miami Law Review*.
- Snow, Sandra L. (ed.) (1976), *A Comparative Model of Corporate Income Tax Shifting Utilizing Cross Sectional Data*, Ph.D. Thesis, University of Missouri, Columbia.
- Sommerfeld, Ray M. and Jones, Sally M. (ed.) (1991), *Federal Taxes and Management Decisions*, Homewood, IL, Richard D. Irwin.
- Sommerfeld, Ray M. and Jones, Sally M. (1995), *Federal Taxes and Management Decisions*, Chicago, Ill., Richard D. Irwin, Inc..
- Sorensen, Peter Birch (1994), 'Some Old and New Issues in the Theory of Corporate Income Taxation', **51** *Finanzarchiv*, 425-456.
- Sorensen, Peter Birch (1995a), 'Changing Views of the Corporate Income Tax', **48** *National Tax Journal*, 279-294.
- Sorensen, Peter Birch (1995b), 'Comment on Alan J. Auerbach, Kevin Hassett and Jan Sodersten: Taxation and Corporate Investment: The Impact of the 1991 Swedish Tax Reform', **2** *Swedish Economic Policy Review*, 385-390.
- Spooner, Gillian M. (1986), 'Effective Tax Rates from Financial Statements', **39** *National Tax Journal*, 293-306.
- Spooner, Gillian M. and Sunley, Emil M. (eds) (1988), 'The Corporate Tax Burden in the United States'.
- Stapleton, R.C. (1972), 'Taxes, the Cost of Capital and the Theory of Investment', **82** *The Economic Journal*, 1273-1292.
- Steenekamp, T.J. (1996), 'Some Aspects of Corporate Taxation in South Africa: The Katz Commission', **64** *South African Journal of Economics*, 1-19.
- Stephan, Paul B. III (1990), 'Disaggregation and Subchapter C: Rethinking Corporate Tax Reform', **76** *Virginia Law Review*, 655-711.
- Steuerle, C. Eugene (1989), 'A Simplified Integrated Tax', **44** *Tax Notes*, 335 ff.
- Stewart, J.C. (1989), 'Transfer Pricing: Some Empirical Evidence from Ireland', **16(3)** *Journal of Economic Studies*, 40-56.
- Stiglitz, Joseph E. (1973), 'Taxation, Corporate Financial Policy, and the Cost of Capital', **2** *Journal of Public Economics*, 1-33.
- Stiglitz, Joseph E. (1976), 'The Corporation Tax', **5** *Journal of Public Economics*, 303 ff.
- Strecker, (1965), 'When Will the Corporate Form Save Taxes', **18** *Vanderbilt Law Review*, 1695 ff.

- Sugin, Linda (1997), 'Theories of the Corporation and the Tax Treatment of Corporate Philanthropy', **41** *New York Law School Law Review*, 835 ff.
- Summers, Lawrence H. (1980), *Tax Policy and Corporate Investment*, National Bureau of Economic Research, 605.
- Summers, Lawrence H. (1981), 'Taxation and Corporate Investment: A Q-Theory Approach', **1** *Brookings Papers on Economic Activity*, 105 ff.
- Sunley, Emil M. (1992), 'Corporate Integration: An Economic Perspective', **47** *Tax Law Review*, 621 ff.
- Surrey, Stanley S. (1975), 'Reflections on "Integration" of Corporation and Individual Income Taxes', **28** *National Tax Journal*, 335-340.
- Suwanmala, Charas (1989), 'Crisis and Response: Treasury Cash Balance Crisis in Thailand 1980-1982', **9(3)** *Public Budgeting and Finance*, 27-36.
- Swaine, David (1989), 'The Longer-term Implications for European Tax Systems', in Gammie, Malcolm, Robinson, Bill and Fitchew Geoffrey, *Beyond 1992: A European Tax System: Proceedings of the Fourth Institute for Fiscal Studies Residential Conference*, Oxford.
- Swan, Peter L. (1984), 'Capital Gains, Cash Flow Taxes, and Corporate Tax Reform', **1(3)** *Australian Tax Forum*, 292-311.
- Swayze, James P. (ed.) (1992), *The Effect of Corporate Income Tax Integration on the Demand for Risky Stock*, Ph.D. Thesis, University of Houston, College of Business Administration.
- Swenson, Deborah (1993), 'Explaining the Low Taxable Income of Foreign-Controlled Companies in the United States', in Giovannini, A., Hubbard, R.G. and Slemrod, J. (eds), *Studies in International Taxation*, Chicago, University of Chicago Press.
- Taggart, Robert A. (1980), 'Taxes and Corporate Capital Structure in an Incomplete Market', **35** *Journal of Finance*, 645-659.
- Taggart, Robert A. (1985), 'Secular Patterns in the Financing of U.S. Corporations', in Friedman, Benjamin (ed.), *Corporate Capital Structures in the United States: An Introduction and Overview*, Chicago, University of Chicago Press.
- Tajika, Eiji and Yui, Yuji (1988), 'Cost of Capital and Effective Corporate Tax Rate the Case of Post War Japan (In Japanese)', **39(2)** *Economic Review (Keizai Kenkyu)*, 118-128.
- Takirambudde, Peter Nanyenya (1994), 'Botswana: Double Corporate Tax: Untangling the Undergrowth of Company and Shareholder Tax Rules', **48(2)** *Bulletin for International Fiscal Documentation*, 82-88.
- Tax Executives Institute (ed.) (1993), *The Structure and Size of the Corporate Tax Department: An Empirical Analysis*, Washington.
- Taylor, Scott A. (1990), 'Corporate Integration in the Federal Income Tax: Lessons From the Past and A Proposal for the Future', **10** *Virginia Tax Review*, 237 ff.
- Taylor, Willard B. (1977), 'Report on the Integration of Corporate and Individual Income Taxes', **31** *Tax Lawyer*, 37 ff.
- Teixeira, Gloria (ed.) (1997), *Taxing Corporate Profits in the EU: A Comparison of the Portuguese, British and Dutch Systems*, London, Kluwer Law International.
- Terborgh, George Willard (ed.) (1959), 'Effect of the Corporate Income Tax on Investment Machinery and Allied Products Institute', **37**.
- Tetreault, David T. and Lindsay, Robert F. (1995), 'The Taxation of Corporate Reorganizations: How are we Doing so Far?', **43** *Canadian Tax Journal*, 1441-1464.

- The Valabh Committee (ed.) (1988), *International Tax Reform: Full Imputation, an Independent Report to the New Zealand Government*, Wellington.
- The Valabh Committee (ed.) (1991), *The Taxation of Distributions from Companies, an Independent Report to the New Zealand Government*, Wellington.
- Thomas, Ann F. (1997), 'Square Wheels: U.S. Passthrough Taxation of Privately Held Enterprises in a Comparative Law Context', **17** *New York Law School Journal of International and Comp. Law*, 429-471.
- Thompson, Samuel C., Jr (1975), 'Tax Policy Implications of Contributions of Appreciated and Depreciated Property to Partnerships, Subchapter C Corporations and Subchapter S Corporations in Exchange for Ownership Interests', **31** *Tax Law Review*, 51 ff.
- Thompson, Samuel C. Jr (ed.) (1993), *Reform of the Taxation of Mergers, Acquisitions, and LBOs*, Durham, NC, Carolina Academic Press.
- Thuronyi, Victor (1983), 'The Taxation of Corporate Income - A Proposal for Reform', **2** *American Journal of Tax Policy*, 109 ff.
- Tillinghast, David R. (1990), 'International Tax Simplification', **8** *American Journal of Tax Policy*, 204-205.
- Treubert, Patrice and Pavelko, Amy (1991), *Internal Revenue Service, 'The Alternative Minimum Tax: An Analysis of Its Effect on Corporations in 1987'*.
- Trezevant, Robert (1981), 'How did Firms Adjust their Tax-Deductible Activities in Response to the Economic Recovery Tax Act of 1981?', **67** *National Tax Journal*, 253-271.
- Trezevant, Robert (1992), 'Debt Financing and Tax Status: Test of the Substitution Effect and the Tax Exhaustion Hypothesis Using Firm's Responses to the Economic Recovery Act of 1981', **47** *The Journal of Finance*, 1557-1568.
- U.S. Department of the Treasury (1992), 'A Recommendation for Integration of the Individual and Corporate Tax Systems', **14** *Daily Tax Rep. (BNA)*, 7 ff.
- U.S. Department of the Treasury (1992), *Report on Integration of the Individual and Corporate Tax Systems: Taxing Business Income Once*.
- United States General Accounting Office (ed.), *Tax Policy Implications of Replacing the Corporate Income Tax with a Consumption Tax*.
- Unni, Sanjay (1994), 'An Intertemporal Analysis of Optimal Capital Structure under Corporate and Personal Taxation', Ph.D. Dissertation.
- Van Den Dempel, A. (1970), *Corporation Tax and Individual Income Tax in the European Communities*.
- Van Raad, Kees (1995), 'In a World where Classical and Integration Systems Co-exist, Article 10 OECD Model should not Disregard the Underlying Corporation Income Tax in International Fiscal Association', *Proceedings of a seminar organised jointly with the EOCD in Toronto in 1994 during the 48th Congress of the International Fiscal Association*.
- Van Rooijen, Martin J. (1977), 'Interrelationship of Corporate Tax and Income Tax of Shareholders', **31(2)** *Bulletin for International Fiscal Documentation*, 64-68.
- Vanistendael, Frans and Gammie, Malcolm (ed.) (1992), *The Ruding Committee Report on European Corporate Tax Harmonisation*, Conference held by the Institute for Fiscal Studies.

- Vanthienen, Lambert and Vermaelen, Theo (1987), 'The Effect of Personal Taxes on Common Stock Prices: The Case of a Belgian Tax Reform', **11** *Journal of Banking and Finance*, 243 ff.
- Vasquez, Nilda D. (ed.) (1981), *The Corporate Income Tax: its Distributive Implications on Individual Shareholders*, University of the Philippines, School of Economics, 8102.
- Vazquez Vega, Pablo (1996), '¿Discriminación positiva? La reforma del impuesto de sociedades en el País Vasco (Positive Discrimination? Corporate Tax Reform in Euskadi)', *Revista de la Camara de Comercio, Industria y Navegación*.
- Vickrey, William, 'The Corporate Income Tax and How to Get Rid of It', in Eden, Lorraine (ed.).
- Village, George Paul (ed.) (1989), *The Effect of Safe Harbor Leasing on Investment and Capital Allocation*, Ph.D. Thesis, Notre Dame Press.
- Vines, Cynthia Carol (ed.) (1991), *The Effects of Regulation on Corporate Tax Shifting: an Analysis of the Property and Casualty Insurance Industry*, Ph.D. Thesis, University of Southern Carolina.
- Virolainen, Kimmo (1991), 'Corporate Tax Exhaustion and Financial Policy: Evidence on Finnish Data', **4(2)** *Finnish Economic Papers*, 130-141.
- Vogel, Klaus (1990), *World-wide vs. Source Taxation of Income - A Review and Reevaluation of Arguments*.
- Vogel, Klaus (1995), 'Introductory Notes in International Fiscal Association. International Taxation of Dividends Reconsidered in Light of Corporate Tax Integration', *Proceedings of a seminar organised jointly with the EOOD in Toronto in 1994 during the 48th Congress of the International Fiscal Association*.
- Von Martens, Christel (1992), 'Beskatning av Kapitalinkomster och av Foretagsinkomst ur Kommunal Synvinkel (with English summary) (The Effect of the New Capital and Corporate Tax Reform on Local Government Finances)', **45(3)** *Ekonomiska Samfundets Tidskrift*, 131-137.
- von Zur Muehlen, Peter (ed.), *Some Partial Equilibrium Effects of Tax Reform on Corporate Policy*, Federal Reserve Board, Washington, Division of Research and Statistics Special Studies, 97.
- Waggoner, Michael J. (1977), 'Eliminating the Capital Gains Preference. Part II: The Problem of Corporate Taxation', **19** *University of Colorado Law Review*, 18 ff.
- Wang, Leonard F.S. (1993), 'Sector Specific Unemployment and Corporate Income Tax Incidence: A Geometric Exposition', **37(1)** *American Economist*, 64-67.
- Wang, Leonard F.S. and Conant, John L. (1988), 'Corporate Tax Evasion and Output Decisions of the Uncertain Monopolist', **41** *National Tax Journal*, 579-581.
- Wang, Shiing-wu (1991), 'The Relation between Firm Size and Effective Tax Rates: A Test of Firms' Political Success', **66** *Accounting Review*, 158-169.
- Wang, Shiing-wu (1994), 'The Relationship between Financial Reporting Practices and the 1986 Alternative Minimum Tax', **69** *Accounting Review*, 495-506.
- Warda, Jacek P. and Zollo, Trancredi (eds) (1987), *The Competitiveness of Canada's Corporate Tax Structure*, Ottawa, Canada Conference Board.
- Warren (1981), 'The Relationship Between the Corporate and Individual Federal Income Taxes After the Economic Recovery Tax Act of 1981', **27** *Proc. National Tax Ass'n*.

- Warren (1989), 'Recent Corporate Restructuring and the Corporate Tax System', **42** *Tax Notes*, 715 ff.
- Warren, Alvin C. (1975), 'Fairness and A Consumption-Type or Cash Flow Personal Income Tax', **88** *Harvard Law Review*, 931 ff.
- Warren, Alvin C. (1994), 'Alternatives for International Corporate Tax Reform', **49** *Tax Law Review*, 601 ff.
- Warren, Alvin C. Jr (1974), 'The Corporate Interest Deduction: A Policy Evaluation', **83** *Yale Law Journal*, 1585 ff.
- Warren, Alvin C. Jr (1981), 'The Relation and Integration of Individual and Corporate Income Taxes', **94** *Harvard Law Review*, 719 ff.
- Warren, Alvin C. Jr (1985), 'Corporate Integration Proposals and ACRS', **22** *San Diego Law Review*, 325 ff.
- Warren, Alvin C. Jr (1987), 'Taxing Corporate Income in the U.S. Twenty Years After The Carter Commission: Integration or Disintegration?', **4** *Australian Tax Forum*, 465-489.
- Weisfelder, Christine J. (ed.) (1991), *Linkages Between Tax Systems: An Analysis of the Corporate Tax Consequences of Transferring Royalties, Interest, and Dividends between Germany, Japan and the United States*, Ph.D. Thesis, University of Michigan.
- Weiss, Randall D. (1979), 'Effective Corporation Income Tax Rates', **32** *National Tax Journal*.
- Werner, Ingrid M. (1994), 'Capital Income Taxation and International Portfolio Choice', **53** *Journal of Public Economics*, 205-222.
- Wetzler, James W. (1993), 'Federal Tax Policy and the States: Corporate Integration', **46** *National Tax Journal*, 393-397.
- Whalley, John (1984), 'Regression or Progression: the Taxing Question of Incidence', **17** *Canadian Journal of Economics*, 654-682.
- Wheeler, J. (1988), 'An Academic Look at Transfer Pricing in a Global Economy', *Tax Notes*, 87-96.
- Wickham, Dale W. and Kerester, Charles J. (1992), 'New Directions Needed for Solution of the International Transfer Pricing Puzzle: Internationally Agreed Rules or Tax Warfare?', **56** *Tax Notes*, 339 ff.
- Wilkie, Patrick J. and Limberg, Stephen T. (1993), 'Measuring Explicit Tax (Dis)Advantage for Corporate Taxpayers: An Alternative to Average Effective Tax Rates', *Journal of the American Taxation Association*, 46-71.
- Wilkie, Patrick J., Young, James C. and Nutter, Sarah E., *Corporate Business Activity Before and After the Tax Reform Act of 1986*.
- Willard, Kristen L. (1994), 'Do Taxes Level the Playing Field? How U.S. Tax Policy Affects the Investment Decisions of Foreign Affiliates in the United States', **29(4)** *Columbia Journal of World Business*, 20-28.
- Williams, David (1995), 'An Optimum Form of Article 10 of the OECD Model in International Fiscal Association. International Taxation of Dividends Reconsidered in Light of Corporate Tax Integration', *Proceedings of a seminar organised jointly with the EOCD in Toronto in 1994 during the 48th Congress of the International Fiscal Association*.

- Wilson, G. Peter (1993), 'The Role of Taxes in Location and Sourcing Decisions', in Giovannini, A., Hubbard, R.G. and Slemrod, J. (eds), *Studies in International Taxation*, Chicago, University of Chicago Press.
- Winsen, Joseph K. (1992), 'The Interaction Between Fringe Benefits Tax, Salary and Franked Dividends', **Sept** *Australian Tax Review*, 149-154.
- Wiseman, Jack (1974), *Theoretical and Empirical Aspects of Corporate Taxation*.
- Wolfman, Bernard (1979), 'Integration of the Corporate and Individual Income Taxes in the United States', **33** *Bulletin for International Fiscal Documentation*, 305-309.
- Wolfson, Mark, Alan, 'The Effects of Ownership and Control on Taxes and Financial Reporting Policy', **22** *Economic Notes*, 318-322.
- Woodside, Kenneth (1982), 'The Symbolic Politics of the Corporate Income Taxation: Canada and Britain, 1945-1980', in Stone, Alan and Harpham Edward (eds), *The Political Economy of Public Policy*, Sage, Beverly Hills.
- Woodworth, Jay N. (1990), 'Different Economic Systems: Vast New Opportunities for Business Economists: NABE Presidential Address', **25(1)** *Business Economics*, 10-17.
- Wozny, James (1991), 'The Taxation of Corporate Source Income in Jamaica', in Bahl, Roy (ed.), *The Jamaican Tax Reform*, Cambridge, MA, Lincoln Institute of Land Policy, 265-323.
- Wu, Chunchi (1996), 'Taxes and Dividend Policy', **5** *International Review of Economics and Finance*, 291-305.
- Wu, Chunchi and Hsu, Junming (1996), 'The Impact of the 1986 Tax Reform on Ex-Dividend Day Volume and Price Behavior', **49** *National Tax Journal*, 177 ff.
- Yin, George K. (1990), 'A Different Approach to the Taxation of Corporate Distributions: Theory and Implementation of a Uniform Corporate-Level Distributions Tax', **78** *Georgetown Law Journal*, 1837 ff.
- Yin, George K. (1992a), 'Achieving Corporate Integration Through Double Taxation', **56** *Tax Notes*, 1365-1368.
- Yin, George K. (1992b), 'Corporate Tax Integration and the Search for the Pragmatic Ideal', **47** *Tax Law Review*, 449-468.
- Yin, George K. (1997), 'The Taxation of Private Business Enterprises: Some Policy Questions Stimulated by the "Check-the-Box" Regulations', **51** *SMU Law Review*, 125 ff.
- York, Harold L. (1993), 'An Applied General Equilibrium Model of International Tax Competition among the Group of Seven Countries', **15(56)** *Journal of Policy Modeling*, 653-672.
- Young, K. H., 'The Effects of Taxes and Rates of Return on Foreign Direct Investment in the U.S.', **41** *National Tax Journal*, 109-121.
- Zarin Nejadan, Milad (1992), 'Fiscalite, q de Tobin et Investissement Prive en Suisse', **58(2)** *Recherches Economiques de Louvain*, 213-235.
- Zelenak, Lawrence (1984), 'Serving Two Masters: Commercial Hues and Tax Exempt Organizations', **8** *U.P.S. Law Review*, 1 ff.
- Zelinsky, Edward A. (1990), 'Greenmail, Golden Parachutes and the Internal Revenue Code: A Tax Policy Critique of Sections 280G, 4999 and 5881', **35** *Villanova Law Review*, 131 ff.
- Zelinsky, Edward A. (1993), 'The Tax Policy Case for Denying Deductibility To Excessive Executive Compensation: Disguised Dividends, Reasonable Compensation, and the Protection of the Corporate Income Tax Base', **58** *Tax Notes*, 1123 ff.

- Zodrow, George R. (1991), 'On the "Traditional" and "New" Views of Dividend Taxation', **44** *National Tax Journal*, 497-509.
- Zodrow, George R. (1997), 'A Corporate Cash Flow Tax as an Income Tax Integration Mechanism', in Head, G. and Krever, Richard (eds), *Company Tax Systems*, Australian Research Foundation, 321-340.
- Zolt, Eric M. (1988), 'Corporate Taxation After The Tax Reform Act of 1986: A State of Disequilibrium', **66** *North Carolina Law Review*, 839 ff.