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others were primarily liturgical in character. Volume of the United States Tax Court Reports containing case abstracts and opinions of the court regarding cases between July 1, 2013 December 31, 2013. Cases in each volume are listed in the prefatory table. The United States Tax Court is a federal trial court of record established by Congress under Article I of the U.S. Constitution, section 8 providing (in part) that Congress has the power to "constitute Tribunals inferior to the Supreme Court. "The Tax Court specializes in adjudicating disputes over federal income tax, generally prior to the time at which formal tax assessments are made by the Internal Revenue Service. Though taxpayers may choose to litigate tax matters in a variety of legal settings, outside of bankruptcy, the Tax Court is the only forum in which taxpayers may do so without having first paid the disputed tax in full. Parties who contest the imposition of a tax may also bring an action in any United States District Court, or in the United States Court of Federal Claims; however these venues require that the tax be paid first, and that the party then file a lawsuit to recover the contested amount paid (the "full payment rule")." Contents 8 Findings of Fact 8 Background 8 John Hancock's History9 Investment Process and Review10 Leasing10 LILO and SILO Transactions 10 Basic Structure 15 History 17 Due Diligence 18 The Hoosier Transaction 19 The LILO Test Transactions 20 OBB LILO20 Lease and Sublease23 End of Sublease Term25 SNCB 2 and SNCB 5 Lot 1 LILO Transactions25 Lease and Sublease28 End of Sublease Term 28 The SILO Test Transactions 29 TIWAG29 Lease and Sublease33 End of

Sublease Term<sup>35</sup> Two Dortmund Transactions<sup>35</sup> Lease and Sublease<sup>38</sup> End of Sublease<sup>39</sup> SNCB SILO<sup>39</sup> Grant and Subgrant<sup>42</sup> End of Subgrant Term 43 Tax Returns, Notices of Deficiency, and Trial 43 Procedural History<sup>48</sup> Trial 53 Opinion 53 Burden of Proof<sup>53</sup> Principal Place of Business<sup>54</sup> Leveraged Lease Transactions<sup>54</sup> Frank Lyon<sup>58</sup> LILO and SILO Litigation 77 The Test Transactions 78 Economic Substance<sup>79</sup> Objective Inquiry<sup>88</sup> Subjective Inquiry<sup>89</sup> Substance Over Form<sup>91</sup> OBB and SNCB LILO Transactions<sup>110</sup> SILO Test Transactions 145 Interest Deductions 147 Original Issue Discount 149 Transaction Expenses 149 Conclusion NOTE: NO FURTHER DISCOUNTS FOR ALREADY REDUCED SALE ITEMS.

Keywords: tax court reports, reports of the united states tax court, u.s. tax court reports, united states tax court reports, united states tax court, u.s. tax court, tax court This text introduces Canada's PIPEDA legislation and its application in the workplace, health care, criminal justice, and the marketplace. Noteworthy developments include the latest decisions of the courts and the Privacy Commissioner of Canada, an increasing concern about data breaches, limitations placed on the Privacy Commissioner by the Supreme Court of Canada, further developments in respect of North American cross-border privacy protection, and forecasted legislative amendments. The essential guide to the AAUP's best practices and policies for higher education, now in its centennial edition. For the past century, the American Association of University Professors (AAUP) has developed standards for sound academic practice while working for the

acceptance of these standards by the higher education community. The Association has long been viewed as the authoritative voice of the academic profession in this regard. The AAUP's Policy Documents and Reports (widely known as the Redbook because of the color of its cover) presents in convenient format a wide range of policies, in some instances formulated in cooperation with other educational organizations. The current edition, the eleventh, includes basic statements on academic freedom, tenure, and due process; academic governance; professional ethics; research and teaching; online and distance education; intellectual property; discrimination; collective bargaining; accreditation; and students' rights and freedoms. The new edition has been thoroughly updated and reorganized thematically. Brief historical introductions have been added to each section, along with an introductory essay on incorporating AAUP principles into faculty handbooks. Among the eighteen new reports included in this edition are statements on academic freedom and outside speakers, campus sexual assault, the inclusion of faculty on contingent appointments in academic governance, and salary-setting practices that unfairly disadvantage women faculty. Reprint of the original, first published in 1869. The enactment of the Japanese Imperial Government Disclosure Act (P.L.106-657) and the issuance of Executive Order 13110 (Jan. 11, 1999) aimed at making U.S. government records related to Japanese war crimes and war criminals in World War II more accessible. Records surveys implementing these requirements disclosed that there were relatively few remaining security-classified relevant

documents waiting for disclosure. On the other hand, better identification of relevant documents and improved access to these records was a primary goal of the White House. The Interagency Working Group (IWG) staff took up the admonition from the National Security Advisor that “Agencies should bring to light hitherto unknown relevant unclassified or declassified records encountered in the course of the search for relevant classified records.” In selecting documents, the IWG Staff focused on several subjects and topics that have longstanding interest and concerns for researchers: Japanese research and experiments in biological warfare (BW) Japanese instigation of biological warfare attacks in World War II Japanese biological warfare experiments on living humans and animals Japanese atrocities against prisoners of war Japanese atrocities against civilian populations Allied decisions to hold Japanese responsible for war crimes Allied decisions to hold war crimes trials Allied decision to consider Emperor Hirohito as a person responsible for war crimes Allied decisions to investigate specific Japanese scientists and military personnel for BW crimes American POWs held at Mukden POW Camp Hoten and any evidence of BW experiments on them Some subjects of current interest, such as “comfort women,” were specifically searched for, but with little success. This collection will continue to expand as new documents are discovered. The Model Rules of Professional Conduct provides an up-to-date resource for information on legal ethics. Federal, state and local courts in all jurisdictions look to the Rules for guidance in solving lawyer malpractice

cases, disciplinary actions, disqualification issues, sanctions questions and much more. In this volume, black-letter Rules of Professional Conduct are followed by numbered Comments that explain each Rule's purpose and provide suggestions for its practical application. The Rules will help you identify proper conduct in a variety of given situations, review those instances where discretionary action is possible, and define the nature of the relationship between you and your clients, colleagues and the courts. Fourteen years since its establishment, the work of the African Commission on Human and Peoples' Rights has not received the attention that should have been paid to its important contributions towards the promotion and protection of human rights in Africa. The aim of this publication is to provide not only the basic documents, but also the less well known material related to the jurisprudence emanating from the consideration of communications. This volume therefore includes, amongst other material, the twelve activity reports adopted by the Commission, resolutions, and final communiqués from the sessions. This is the first attempt to reproduce comprehensively the many documents of the Commission adopted since its inception in 1987. It will be an essential reference for academics, students, and practitioners. The publication is produced in collaboration with the African Society for International and Comparative Law, the Centre for Human Rights at the University of Pretoria and Interights in London. The most significant achievement of 20th century is, probably, the importance ascribed to the idea of human rights. And perhaps the most significant endeavour of the



world community in the second half of this century is its attempt to codify these ethical demands in declarations, covenants and similar instruments expected to have universal validity. Yet besides the unscrupulous violence, torture and social injustice, which continue to prevail in our world, we also see gaining more and more ground tendencies to promote demands and practices which constitute unnoticed obstacles to the protection of human rights. Is it not the so-called "herd immunity", as a way to fight against a pandemic, a violation of the right to life? What are our shortcomings? The present volume is an attempt to bring into focus one of these shortcomings: the lack of clear knowledge of what human rights are.

*A Source Book for Mediæval History* is a scholarly piece by Oliver J. Thatcher. It covers all major historical events and leaders from the Germania of Tacitus in the 1st century to the decrees of the Hanseatic League in the 13th century.

*R Markdown: The Definitive Guide* is the first official book authored by the core R Markdown developers that provides a comprehensive and accurate reference to the R Markdown ecosystem. With R Markdown, you can easily create reproducible data analysis reports, presentations, dashboards, interactive applications, books, dissertations, websites, and journal articles, while enjoying the simplicity of Markdown and the great power of R and other languages. In this book, you will learn Basics: Syntax of Markdown and R code chunks, how to generate figures and tables, and how to use other computing languages Built-in output formats of R Markdown: PDF/HTML/Word/RTF/Markdown documents and ioslides/Slidy/Beamer/PowerPoint

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