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singapore s success story is essentially a people story singaporeans have good reason to celebrate the nation s golden jubilee with pride in the short space of five decades the country has moved from third world to first and its real gdp has grown by 40 times for this phenomenal progress credit must go to its people the republic s primary resource against all odds and amidst dire predictions singaporeans proved that a united and resourceful community could build a nation from scratch this book is dedicated to one segment of these singaporeans the chinese community in particular this collection of essays focuses on the chinese speaking members of the community whose many contributions are less familiar to those brought up on a strict diet of the english language a wide ranging and authoritative history of sogat which provides a valuable insight into the paper and printing industries during a period of great change and an examination of crucial moments in recent uk industrial relations history 1859 accompanied by volume of maps with title engravings of plans profiles and maps illustrating the standard models from which are built the important structures on the new york state canals 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 term35 two dortmund transactions35 lease and sublease38 end of sublease39 sncb silo39 grant and subgrant42 end of subgrant term 43 tax returns notices of deficiency and trial 43 procedural history48 trial 53 opinion 53 burden of proof53 principal place of business54 leveraged lease transactions54 frank lyon58 lilo and silo litigation 77 the test transactions 78 economic substance79 objective inquiry88 subjective inquiry89 substance over form91 obb and sncb lilo transactions110 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 volumes include statutory record originally published in 1954 this is the first full length account of the history of the working men s college in st pancras london one hundred and fifty years on from its foundation in 1854 it is the oldest adult educational institute in the country self governing and self financing it is a rich part of london s social history the college stands out as a distinctive monument of the voluntary social service founded by the victorians unchanged in all its essentials yet adapting itself to the demands of each generation of students and finding voluntary and unpaid teachers to continue its tradition

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The Lancet

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