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ISSN 1547-3996, Online ISSN: 1933-9348
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- S** **The Battle Continues: Bank One /JPMorgan & Swap Market Valuation under Section 475: Seventh Circuit Rules Against the Taxpayer—and Rebukes the Tax Court**
pp. 5-9(5)
Author: Conlon, Stevie D.

- S** **new Commodities Vehicles: How Markets responded to Rev. Rul. 2006-1**
pp. 10-12(3)
Author: Gordon, Robert

- S** **Providing Financing to Charitable Hospitals Means NOT Taking Control**
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Author: Deane, L. Nicholas

- S** **Minority Banks Continue To Be Less Profitable, GAO Study Finds**
pp. 19-21(3)
Author: Kay, Joan Teresa

- S** **Bumping—A Sure Way to Ruin Your Day**
pp. 22-25(4)
Author: Holland, Michael J.

- S** **Insurance Company Anti-Money Laundering Compliance A to Z: A Complete Guide to Designing, Implementing, and Enforcing an Insurance Company AML Program**
pp. 26-38(13)
Author: Ensminger, John J.

Click on an **Article Title** for additional details including Abstract, References, and access to the full text (next page, please):

S The Battle Continues: Bank One /JPMorgan & Swap Market Valuation under Section 475: Seventh Circuit Rules Against the Taxpayer—and Rebukes the Tax Court

Author: Conlon, Stevie D.

Source: Journal of Taxation and Regulation of Financial Institutions, Volume 20, Number 3, January/February 2007, pp. 5-9(5)

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Judge Manion concluded that the Tax Court had failed to evaluate the IRS method under the proper standard—the clear reflection of income standard of Section 446.

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You'll be taken to the "Advanced Search" screen (next page ...)

This close-up screenshot focuses on the search interface. It shows a "Browse" section with a "Search" input field and a "GO" button. Below the search field are three radio button options: "Electronic content" (selected), "Fax/Ariel content", and "Journal or book title". The "Advanced search" link is highlighted with a mouse cursor, and the "Search history" link is also visible. Below the search section are sections for "Shopping cart", "Tools" (with links for Print, Subscription options, Linking options, Alerting options, and Bookmarking options), and a "Sign in" section. At the bottom, there is a "Text size" section with four "A" icons of increasing size.

Enter a keyword or term in the Search For box. If you're not sure whether the term is part of the article title, the first radio button will execute your search throughout the entire "meta data" (titles, keywords and abstracts) finding articles that include your term even if it isn't part of the title.

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Important: To limit your search to just TFI, be sure to enter **Journal of Taxation and Regulation of Financial Institutions** and click the middle radio button for **Exact Title**.

Then click to begin searching.
 It may take a minute or two to gather all the results.

You'll know a search is being performed when the little dotted circles in the upper right corner of your screen are rotating like so ...



After a brief pause, you'll get a list of articles that include your keyword...

(See next page for Search Results...)

Search Results

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- S** **The Battle Continues: Bank One /JPMorgan & Swap Market Valuation under Section 475: Seventh Circuit Rules Against the Taxpayer—and Rebukes the Tax Court**
 Author: Conlon, Stevie D.
 Source: Journal of Taxation and Regulation of Financial Institutions, Volume 20, Number 3, January/February 2007, pp. 5-9(5)
 Publisher: Civic Research Institute
- S** **Bank's S Election Ineffective Because It Had More Than One Class of Stock**
 Source: Journal of Taxation and Regulation of Financial Institutions, Volume 20, Number 2, November/December 2006, pp. 39-40(2)
 Publisher: Civic Research Institute
- S** **In Bank One Appeal, Seventh Circuit Finds Deference to Service's Method Warranted Given Peculiar Record and Circumstances**
 Source: Journal of Taxation and Regulation of Financial Institutions, Volume 20, Number 2, November/December 2006, pp. 41-44(4)
 Publisher: Civic Research Institute
- S N** **The Case for Book-Tax Conformity for Mark-to-Market Valuations**
 Authors: Munro, Alan B.; Keinan, Yoram
 Source: Journal of Taxation and Regulation of Financial Institutions, Volume 16, Number 6, July/August 2003, pp. 5-17(13)
 Publisher: Civic Research Institute
- S N** **Bank One: A Mark-to-Market Roadmap**
 Author: Rosenthal, Steven M.
 Source: Journal of Taxation and Regulation of Financial Institutions, Volume 16, Number 6, July/August 2003, pp. 18-21(4)
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This technique allows you to gather a number of articles from past issues of *Journal of Taxation and Regulation of Financial Institutions* on a single subject.

Notice that some articles are included that do not contain "Bank One" in the title. These articles were selected because the search term is included in the abstract or keyword list.

Let's click on one of the articles that does not include the term "Bank One" in the title: **[The Case for Book-Tax Conformity for Mark-to-Market Valuations](#)**

The results are on the next page ...

S N The Case for Book-Tax Conformity for Mark-to-Market Valuations

Authors: Munro, Alan B.; Keinan, Yoram

Source: Journal of Taxation and Regulation of Financial Institutions, Volume 16, Number 6, July/August 2003, pp. 5-17(13)

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Abstract:

Bank One seems like a revolutionary decision attempting to set forth a standard for valuation of interest rate swaps (and presumably, other derivatives) for purposes of Section 475 but, on closer examination, the case affirms a common practice among most participants in the derivatives industry.

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A search for “Bank One” through TFI Online’s full “meta data” fields identified the key words in the abstract.

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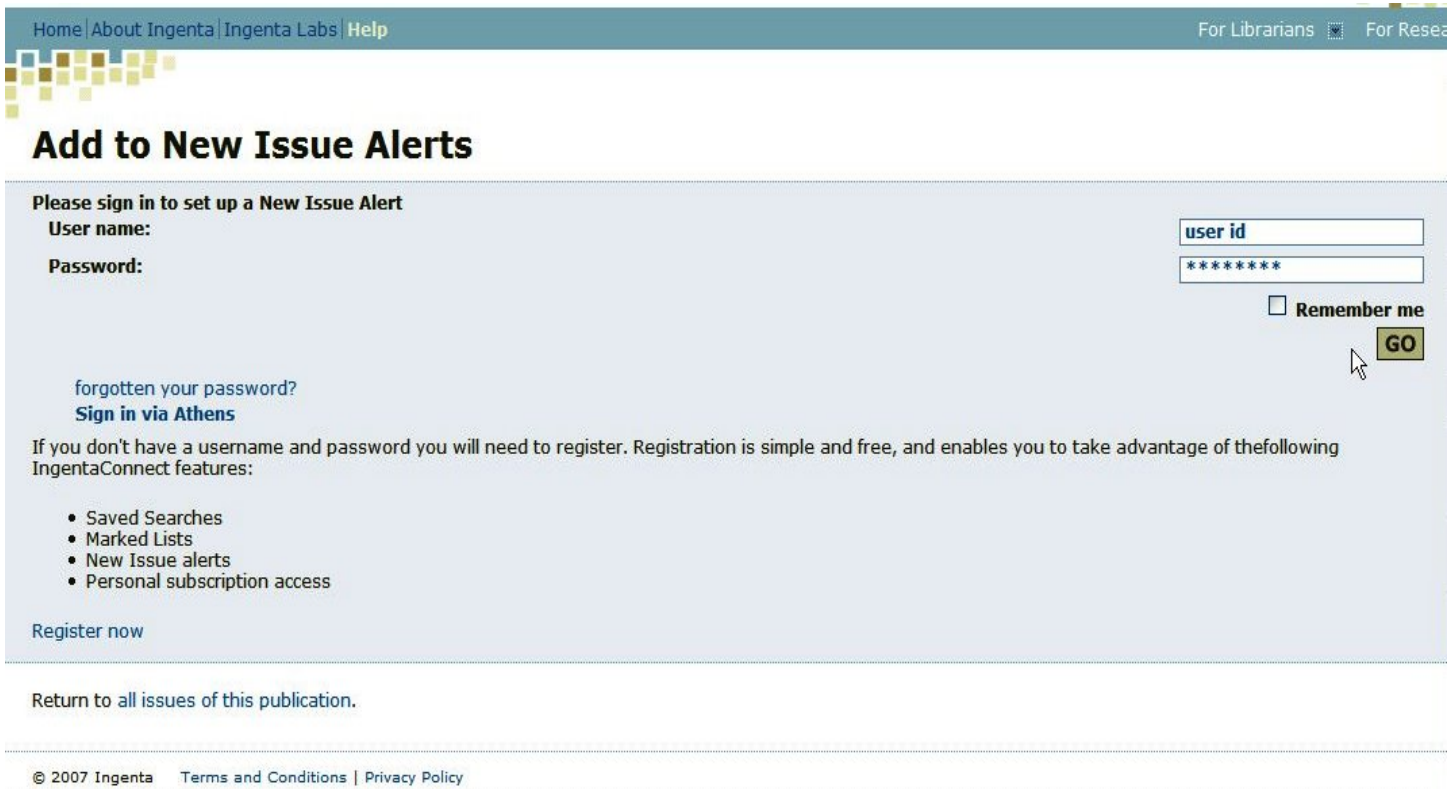
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

Active reference linking from the reference section of each article allows you to follow through lines of research. For example,

  **Why Do Issuers Privately Place Municipal Bonds?**

Authors: Robbins, Mark D.; Simonsen, Bill
Source: *Municipal Finance Journal*, Volume 27, Number 3, October 2006, pp. 1-17(17)
Publisher: Civic Research Institute

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Abstract:

This article addresses the private placement of municipal bonds and describes the characteristics that distinguish them from bonds marketed to the general public. It establishes a theoretical "rational expectations hypothesis" that issuers select this sale type to exploit their putative advantages, particularly with regard to the ease of issuance and lack of disclosure requirements. This hypothesis creates an anticipation that riskier, smaller, and poorer credit quality issues are, on average, more likely to be privately placed than other issues all else being equal. The findings are generally consistent with that hypothesis. The final section of the article reports on the authors' interviews with issuers who chose private placements. The majority of these issuers based their choice on professional advice. Other justifications, such as the anticipation of lower issuance costs or payment flexibility were reported relatively rarely.

References: 7 references open in new window

There are [7 references](#) in this article. Click on the live link and ...

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Authors: Robbins, Mark D.; Simonsen, Bill

Source: [Municipal Finance Journal](#), Volume 27, Number 3, October 2006, pp. 1-17(17)

Publisher: Civic Research Institute

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Information asymmetry, monitoring, and the placement structure of corporate debt

Authors: Krishnaswami S.; Spindt P.A.; Subramaniam V.¹

Source: [Journal of Financial Economics](#), Volume 51, Number 3, March 1999, pp. 407-434(28)

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Abstract:

We empirically examine the impact of flotation costs, agency conflicts, regulation, and information asymmetries on a firm's mix between public and private debt. Results indicate that firms with larger issue sizes exploit the scale economies in flotation costs of public debt. Firms with higher contracting costs due to moral hazard have higher proportions of private debt. There is only limited support for the adverse selection hypothesis. We find little evidence that firms with favorable private information about future profitability choose more private debt. However, those firms with favorable information about future profitability that also operate under greater information asymmetry rely more on private debt.

Keywords: [JEL classification codes] G30; [JEL classification codes] G32; Debt financing; Monitoring; Moral hazard; Adverse selection; Capital structure

Language: English

Document Type: Research article

DOI: 10.1016/S0304-405X(98)00059-2

Affiliations: 1: A.B. Freeman School of Business, Tulane University, New Orleans, LA, USA

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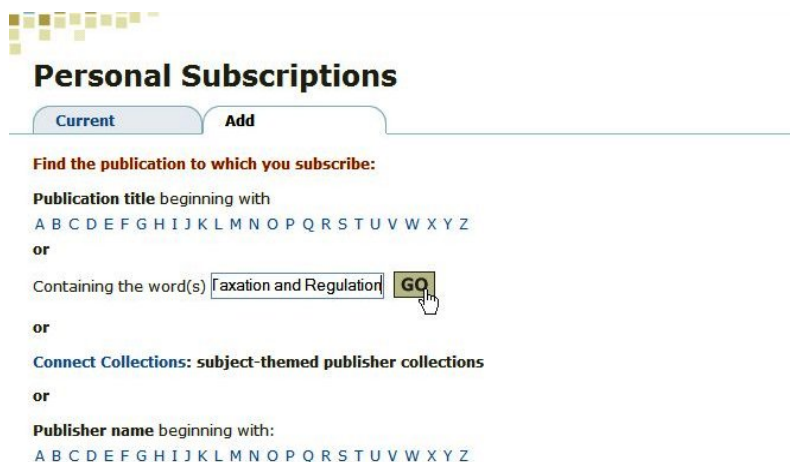
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- If articles are to be received via fax or Ariel, a default fax number or the IP number of your Ariel machine (optional).

Authentication:

Access to IngentaConnect can be set up in two ways. You may choose one or both methods of authentication.

- IP address/range (users accessing from computers within an IP range defined by the site administrator) - You may need to consult your network administrator for this information.
- User name and password.

Step 1 – Institutional and administrator contact details

Step 2 – Authentication

Step 3 – Article delivery information

Step 4 – Admin sign in

Step 5 – Confirmation of Registration

The confirmation screen will provide you with your Ingenta customer ID number. Please provide this number whenever you contact Ingenta as this will allow us to bring up your registration details immediately. After reading about the benefits of IngentaConnect Premium, you can click 'continue'. You can now click on the link 'set up subscriptions' to set up your institutional subscriptions.

At a later date, to request access to additional titles just sign in with your Administrator username and password and select the link for 'subscriptions' on the right navigation. You can then view the titles to which you currently have access to, or set up new ones.