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2. FUNDAMENTAL PRINCIPLES OF TAXATION â€“ 29 Chapter 2 Fundamental principles of taxation This

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illustrate complex points. Particularly helpful are the explanations of complex areas of law and the work of international bodies such as the UN and OECD in tax planning.

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Comments 22 2. Application of Tax Treaties 27 2.1. Vienna Convention on the Law of Treaties 27 2.2. How  
International Treaties Come into Force 31 v

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package of international tax law changes that included exemption could, on the whole, pay for itself or even raise revenue, depending on the other items in the package, this ... principles that are routinely used elsewhere in public economics. To begin in demonstrating the need for a new approach, consider the

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of international taxation agreements, which seek, among other things, to set out detailed allocation rules for different categories of income. While international tax agreements deal foremost with ... of income source and residence principles. This, together with mismatches in definition, accounting and income recognition rules,

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the structural implications of the U.S. international tax laws. Thus, in terms of the first metric of importance, the International Taxation course is likely to be very important to the practice of many of our graduates. And, as to the second metric, U.S. international taxation is an unquestionably difficult area of the law to master on your own.

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LECTURE 2: PRINCIPLES OF INTERNATIONAL TAX LAW Treaties The definition of a treaty is an agreement between two sovereign nations, which serves as a ... International tax law = only permits enforcement by a country of its tax laws within its legislative jurisdiction.

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International parent-country taxation obviously does not apply to local owners of productive assets, and it may also not apply or apply less to potential foreign owners from third countries.

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Basic International Taxation Roy Rohatgi KLUWER LAW INTERNATIONAL LONDON / THE HAGUE / NEW YORK. TABLE OF CONTENTS Preface xiii ... PRINCIPLES OF INTERNATIONAL TAX LAW 11 1. International Tax Law 11 1.1. Definition 11 1.2. Juridical Double Taxation 12 1.3. Connecting Factor Conflicts 13

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UNDERSTANDING CORPORATE TAXATION Leandra Lederman Professor of Law George Mason University School of Law ... taxation under Subchapter C, businesses may be organized as partnerships, or as other entities, such as limited liability companies (LLCs). A limited

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â€“Personal=Residence=Place of incorporation â€“Taxation on net basis, receipts less deductions

â€“Source=series of international conventions, partly economic, partly legal â€“Usually taxed on gross basis, withholding tax ... Some International Tax Concepts

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the international tax system is about perceived inadequate taxation of a highly porous tax base, even with the conjoined operation of the residence and source principles.

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By ... century ago, when the basic principles were put in place, foreign direct investment was largely a

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