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Judicial Interpretation of Tax Treaties Carlo Garbarino, 2016-10-28 *Judicial Interpretation of Tax Treaties* is a detailed analytical guide to the interpretation of tax treaties at the national level. The book focuses on how domestic courts interpret and apply the OECD Commentary to OECD Model Tax Convention on Income and on Capital. Adopting a global perspective, the book gives a systematic presentation of the main interpretive proposals put forward by the OECD Commentary and analyses selected cases decided in domestic tax systems in order to assess whether and how such solutions are adopted through national judicial process and indeed which of these are of most practical value. The book operates on two levels: firstly it sets out a clear and comprehensive framework of tax treaty law which will be an important tool for any tax practitioner. Secondly the book provides crucial guidance on issues of tax treaty law as applied at domestic level such as investment or business income dispute resolution and administrative cooperation.

Virtues and Fallacies of VAT: An Evaluation after 50 Years Robert F. van Brederode, 2021-08-09 Value added tax (VAT) is a mainstay of revenue systems in more than 160 countries. Because consumption is a more stable revenue base than other tax bases, VAT is less distorting and hence more likely to encourage investment, savings, optimum labor supply decisions, and growth. VAT is not without criticism, however, and faces its own specific technical and policy challenges. This book, the first to thoroughly evaluate VAT from a global policy perspective after over 50 years of experience with its intricacies, offers authoritative perspectives on VAT's full spectrum from its signal successes to the subtle ways its application can undermine revenue performance and economic neutrality. The contributors, leading tax practitioners and academics, examine the key policy issues and topics that are crucially relevant for measuring the success of the tax in the first part of the book, including revenue generation and revenue efficiency, single rate versus multiple rates, susceptibility to fraud, exemptions and exceptions, compliance cost for businesses, policy and compliance gaps in revenue collection, adjustment rules caused by the transactional nature of the tax, transfer pricing issues, treatment of vouchers, permanent establishments and holding companies, payment of refunds, cross border digital transactions, and supplies for free or below cost price. The second part offers six country reports on New Zealand, Japan, China, Colombia, Ethiopia, and India to demonstrate the different ways in which VAT operates in a variety of national economies. Whether a government is contemplating the imposition of a general consumption tax for the first time or new rules for applying an existing one, it is important for policymakers to keep central the aim to design a tax that realizes optimal efficiency and causes minimal distortions. This invaluable book serves as an expert guide to VAT policy development in this area. It will be welcomed not only by concerned government officials but also by tax professionals, both lawyers and accountants and academics in tax law.

Dollars, Polity and Law George M. Hall, 2014-07-25 Revamping the Political Economy after the Impending Collapse. No country can borrow indefinitely without fatal consequences. But that is just what the United States is doing, adding nearly a trillion dollars annually to its already massive debt as overseen by a Congress with

an approval rating in the 10 to 14 percent range In the process the mind set that spawned the sub prime mortgage now renders the entire economy sub prime This book explains why and how resolution might obtain after the collapse The essence is termed polity economics given that the bifurcated concepts of capitalism and socialism have lost their utility yet persist as incompatible political touchstones This perspective includes some twenty explicit elements all addressed at length Yet by itself it too will also eventually fail For it is also essential to restate the Constitution so that it becomes efficaciously aligned with the evolved culture and ethic of the United States especially to instill stability within the fiscal operations that have come to dominate the country The ABC s of that admittedly profound document simply do not address the D through Z s that have devolved over more than two centuries Excerpts On fiscal carrying capacity Isn t the United States simply too big to fail History laughs Every empire and nation has been laid waste when it continuously reached for more than it could grasp which leads to the primary argument in this book Every economy has a substantive need for just so much money and fungible assets a carrying capacity so to speak When that capacity is exceeded money becomes a commodity in its own right Given propensities to accumulate money and inflate values over a bread and butter baseline the economy degenerates in three successive tiers The first tier harbors the inevitable dis tensions of economics such as periodic business cycles and recessions Yet money remains a tool not the essence But if recessions are avoided money begins to compete with the substantive aspects of an economy This is the second tier where leveraged val ues inherently devolve unstable followed eventually by a depression Yet even de pres sion can be staved off by massive bailouts and unsustainable debt This is the third tier Money takes pri or ity over substance until that is the economy collapses On political versus supposed economic rights There may be free speech there is no free lunch Monthly Catalog of United States Government Publications ,1996 *Monthly Catalogue, United States Public Documents* ,1985 Research Handbook on Public Financial Management Komla Dzignbede,W. B. Hildreth,2023-08-14 This scholarly Research Handbook captures key observations and analyses within the field of public financial management It offers much needed insights into possible future research ventures while presenting contemporary summaries of past studies in this ever evolving field *Professional Journal of the United States Army* ,2017-11 **Mergent Company Archives Manual** ,2005 Africa's Mineral Fortune Saleem H. Ali,Kathryn Sturman,Nina Collins,2018-08-20 For too long Africa s mineral fortune has been lamented as a resource curse that has led to conflict rather than development for much of the continent Yet times are changing and the opportunities to bring technical expertise on modern mining alongside appropriate governance mechanisms for social development are becoming more accessible in Africa This book synthesizes perspectives from multiple disciplines to address Africa s development goals in relation to its mineral resources The authors cover ways of addressing a range of policy challenges environmental concerns and public health impacts and also consider the role of globalization within the extractive industries Academic research is coupled with key field vignettes from practitioners exemplifying case studies throughout The book summarizes the challenges of natural

resource governance suggesting ways in which mining can be more effectively managed in Africa By providing an analytical framework it highlights the essential intersection between natural and social sciences central to efficient and effective harnessing of the potential for minerals and mining to be a contributor to positive development in Africa It will be of interest to policy makers industry professionals and researchers in the extractive industries as well as to the broader development community

Yearbook of International Organizations 2014-2015 (Volume 4) Union Of International Associations, Union of International Associations, 2014-09-17 The Yearbook of International Organizations provides the most extensive coverage of non profit international organizations currently available Detailed profiles of international non governmental and intergovernmental organizations IGO collected and documented by the Union of International Associations can be found here In addition to the history aims and activities of international organizations with their events publications and contact details the volumes of the Yearbook include networks between associations biographies of key people involved and extensive statistical data Providing both an international organizations and research bibliography Volume 4 cites over 46 000 publications and information resources supplied by international organizations and provides nearly 18 000 research citations under 40 subject headings This volume also includes a research bibliography on international organizations and transnational associations

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