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term In her very thorough analysis of the application of beneficial ownership the author touches on such aspects as the following historical development of the beneficial ownership requirement as used in tax treaties and in the OECD Model Tax Convention on Income and on Capital rules of double taxation conventions application of the OECD s Action Plan on Base Erosion and Profit Shifting BEPS the problem of so called white income use of the substance over form principle attribution of income rules and the role of agents nominees and conduit companies Specific analysis of the use and interpretation of beneficial ownership in a domestic law and treaty context in numerous jurisdictions with particular emphasis on the United Kingdom Australia the United States and Germany is a major feature of the presentation As a thorough guide to determining whether a person claiming tax treaty benefits is the true owner and which parties are excluded from treaty benefits and to what extent this book will be of immeasurable value to lawyers tax authorities policymakers and other professionals working with taxable international transactions of any kind

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Table of Contents Federal Taxation 2015 Study Guide

1. Understanding the eBook Federal Taxation 2015 Study Guide
 - The Rise of Digital Reading Federal Taxation 2015 Study Guide
 - Advantages of eBooks Over Traditional Books
2. Identifying Federal Taxation 2015 Study Guide
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Federal Taxation 2015 Study Guide
 - User-Friendly Interface
4. Exploring eBook Recommendations from Federal Taxation 2015 Study Guide
 - Personalized Recommendations
 - Federal Taxation 2015 Study Guide User Reviews and Ratings
 - Federal Taxation 2015 Study Guide and Bestseller Lists
5. Accessing Federal Taxation 2015 Study Guide Free and Paid eBooks
 - Federal Taxation 2015 Study Guide Public Domain eBooks
 - Federal Taxation 2015 Study Guide eBook Subscription Services
 - Federal Taxation 2015 Study Guide Budget-Friendly Options
6. Navigating Federal Taxation 2015 Study Guide eBook Formats

- ePub, PDF, MOBI, and More
- Federal Taxation 2015 Study Guide Compatibility with Devices
- Federal Taxation 2015 Study Guide Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Federal Taxation 2015 Study Guide
 - Highlighting and Note-Taking Federal Taxation 2015 Study Guide
 - Interactive Elements Federal Taxation 2015 Study Guide
- 8. Staying Engaged with Federal Taxation 2015 Study Guide
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Federal Taxation 2015 Study Guide
- 9. Balancing eBooks and Physical Books Federal Taxation 2015 Study Guide
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Federal Taxation 2015 Study Guide
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Federal Taxation 2015 Study Guide
 - Setting Reading Goals Federal Taxation 2015 Study Guide
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Federal Taxation 2015 Study Guide
 - Fact-Checking eBook Content of Federal Taxation 2015 Study Guide
 - Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
- 14. Embracing eBook Trends
 - Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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