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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 **The Federal Reporter** ,1914 Includes cases argued and determined in the District Courts of the United States and Mar May 1880 Oct Nov 1912 the Circuit Courts of the United States Sept Dec 1891 Sept Nov 1924 the Circuit Courts of Appeals of the United States Aug Oct 1911 Jan Feb 1914 the Commerce Court of the United States Sept Oct 1919 Sept Nov 1924 the Court of Appeals of the District of Columbia *Conference Publications Guide* ,1974 **Moody's Industrial Manual** ,1930 Subject Catalog ,1982 Library of Congress,1982

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