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Full Title: Klaus Vogel on Double Taxation Conventions, Third Edition, A Commentary to the OECD, UN and U.S. Model Conventions for the Avoidance of Double Taxation of Income and Capital, With Particular Reference to German Treaty Practice A Commentary to the OECD, UN and U.S. Model Conventions for the Avoidance of Double Taxation of Income and Capital, With Particular Reference to German Treaty Practice. Double taxation conventions (DTCs) raise a plethora of interpretational questions for the practitioner and student of tax law. This book provides the answers. An encyclopedic treatise on DTCs, Klaus Vogel on

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Double Taxation Conventions is a guide to all legal issues DTCs raise and includes information on worldwide case law and commentators' views. The OECD Model Convention serves as the organisational basis for this work. Each chapter focuses on one article of the Convention and provides: the wording of the article and that of the respective articles of the UN and US Models, the official Commentary by OECD, and an extensive discussion by the authors of the legal problems involved. In addition, Klaus Vogel on Double Taxation Conventions offers an account of all German tax treaties, how

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they differ from the model provisions, and the potential practical impact of such differences. The first two editions have been used by lawyers, tax advisers, and scholars all over the world. Courts in Canada, Germany, South Africa, and the Netherlands have cited them as authority. This revised edition includes the most recent OECD Model revisions and all recent case law and relevant literature. The authors have rethought many of the problems discussed, further improved their argument, and amended their views where they have been convinced by opponents.

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A Commentary to the OECD, UN and U.S. Model Conventions for the Avoidance of Double Taxation of Income and Capital, With Particular Reference to German Treaty Practice. Double taxation conventions (DTCs) raise a plethora of interpretational questions for the practitioner and student of

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tax law. This book provides the answers. An encyclopedic treatise on DTCs, Klaus Vogel on Double Taxation Conventions is a guide to all legal issues DTCs raise and includes information on worldwide case law and commentators' views. The OECD Model Convention serves as the organisational basis for this work. Each chapter focuses on one article of the Convention and provides: the wording of the article and that of the respective articles of the UN and US Models, the official Commentary by OECD, and an extensive discussion by the authors of the legal problems involved. In addition, Klaus

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Vogel on Double Taxation Conventions offers an account of all German tax treaties, how they differ from the model provisions, and the potential practical impact of such differences. The first two editions have been used by lawyers, tax advisers, and scholars all over the world. Courts in Canada, Germany, South Africa, and the Netherlands have cited them as authority. This revised edition includes the most recent OECD Model revisions and all recent case law and relevant literature. The authors have rethought many of the problems discussed, further improved their argument, and amended

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their views where they have been convinced by opponents.

Following the structure of the main commentary, this supplement supplies the reader with both the OECD's amendments and

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with cases, rulings and literature published since the first edition. Further, it provides a preliminary analysis. Thus, this book (if desired in conjunction with the main commentary) keeps the reader current on international double taxation convention law as of March 1994.

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