

International tax as international law - an analysis of the international tax regime

Cambridge University Press - International Tax as International Law: An Analysis Of The International Tax Regime (Cambridge Tax Law Series): Avi

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The Emergence of a New International Tax Regime: The OECD's Package on Base Erosion and Profit Shifting (BEPS)

That is bad news for the United States. In particular, global challenges to national fiscal sovereignty are discussed.

Justice in International Tax Law

He is currently a member of the Steering Group of the OECD International Network for Tax Research and Chair of the ABA Tax Section VAT Committee. Introduction The Tax Cuts and Jobs Act TCJA radically changed the international tax system.

Competition, Tax Arbitrage and the International Tax by Reuven S. Avi

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Cambridge tax law series
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The applicable tax rate for the BEAT is 5 percent in 2018, 10 percent for 2019-2025, and 12. Beyond the specifics of the proposed rules are three important dynamics.

Justice in International Tax Law

Interests are aligned, in this limited sense, facilitating cooperation. If not, inconsistencies loom, and BEPS outcomes may be undone or warped beyond recognition to the displeasure of tax administrations, companies, or both at the WTO or under bilateral investment treaties.

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This provision and the Base Erosion and Anti-Abuse Tax BEAT discussed below were the two major provisions that were created to help combat tax avoidance and generate revenue to offset the cost of the move to a territorial tax system. Finally, this paper concludes by seeking alternatives to enhance global tax governance through the coordination of a bilateral tax treaty network and a global tax network in international finance. The BEPS Package, though formally approved by all OECD and G20 members, is not a legally binding treaty.

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He became an Assistant Professor of Law at Harvard Law School in 1994 and moved to the University of Michigan in 2000. Copyright by The American Society of International Law The purpose of ASIL Insights is to provide concise, objective, and timely background for recent developments of interest to the international community.



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