

DOUBLE TAXATION

Convention and protocol signed at Paris April 27, 1932

Senate advice and consent to ratification June 15, 1932

Ratified by the President of the United States July 25, 1932

Ratified by France April 8, 1935

Ratifications exchanged at Paris April 9, 1935

Proclaimed by the President of the United States April 16, 1935

Entered into force January 1, 1936

*Terminated January 1, 1945, by convention of July 25, 1939*¹

49 Stat. 3145; Treaty Series 885

CONVENTION

The PRESIDENT of the UNITED STATES of AMERICA and the PRESIDENT of the FRENCH REPUBLIC being desirous of regulating certain questions relative to double taxation, have decided to conclude a Convention on that subject, and for that purpose they have appointed as their respective Plenipotentiaries:

The PRESIDENT OF THE UNITED STATES OF AMERICA,

Mr. Walter E. EDGE, Ambassador Extraordinary and Plenipotentiary of the United States of America to France.

The PRESIDENT OF THE FRENCH REPUBLIC,

M. André TARDIEU, Member of the House of Representatives, President of the Council of Ministers, Minister for Foreign Affairs, Officer of the Legion of Honour,

who, having communicated to one another their full powers found in good and due form, have agreed upon the following articles:

ARTICLE I

Enterprises of one of the contracting States are not subject to taxation by the other contracting State in respect of their industrial and commercial profits except in respect of such profits allocable to their permanent establishments in the latter State.

No account shall be taken, in determining the tax in one of the contracting States, of the purchase of merchandise effected therein by an enterprise of the

¹ TS 988, *post*, p. 1046.