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documents that uncover the ordinary meaning of treaty terms tax treaty case law and court decisions and fiscal tax and legal scholarship surrounding the concept of residence for taxation purposes The analysis includes a comprehensive description of tiebreaker rules various perspectives on place of effective management and policy considerations as to the further development of the treatment of entities under double tax conventions Given the inordinate importance of the definition of resident the differences in interpretation to which the current definition gives rise and the economic developments that call for an evaluation of the provision this thorough examination of the treaty rules on residence of entities will be welcomed by tax lawyers corporate counsel and policymakers and academics concerned with tax law The author s guidance on the concept of residence for tax purposes and his original proposals for reform will prove of great practical value for tax practitioners

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