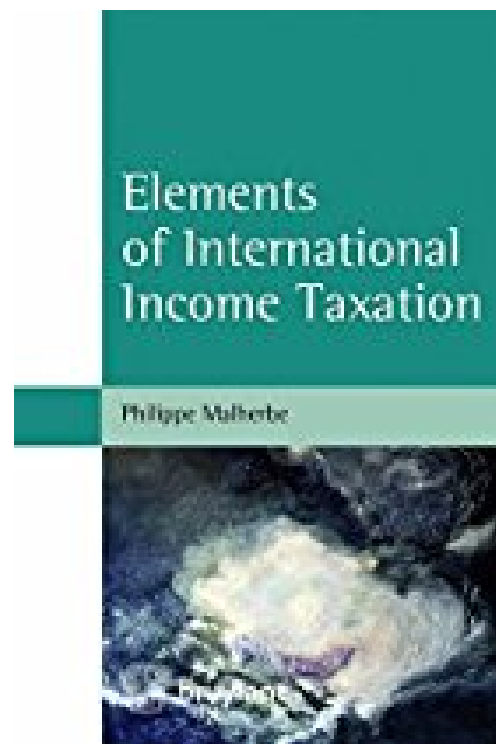




Elements of international income taxation



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194 pages

Présentation de l'éditeur

Income taxation is the fuel and vector of the economic policy of many states. This concise book, destined to students, practitioners and policy makers, explains the issues of taxation of transnational income in a world of sovereign states: how to prevent unjust and inefficient double taxation of the same income, by allocating the tax base between source and residence state and properly allowing in the latter for the tax levied in the former? How to prevent abuse by taxpayers or states, furthering tax evasion or avoidance and causing other but equally significant injustices and inefficiencies? Solutions developed over a century of practice are analyzed. That field of the legal art & science is still young and the paradigm for ideal taxation in the global village of the XXIst century is yet to be invented.

An appendix includes the juxtalinear texts of the OECD and UN Model Conventions. Biographie de l'auteur Philippe Malherbe is both a practitioner and an academic, as professor at Université catholique de Louvain, visiting professor at Université de Paris-Est Créteil and avocat in Brussels (partner in the Liedekerke law firm). He holds a law and an economics degree from the Université catholique de Louvain and a LL.M. from the University of California, Berkeley.

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