

LA904: Issues in the Taxation of International Business

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@article{Akehurst, Michael_1972, address={United Kingdom}, title={Jurisdiction in International Law}, volume={46}, url={http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/byrint46&id=175&collection=journals&index=journals/byrint}, journal={British Year Book of International Law}, publisher={Oxford University Press}, author={Akehurst, Michael}, year={1972}, pages={145-257} }

@article{Anderson_2003, address={Netherlands}, title={Taxation of UK Branches of Non-UK Companies}, volume={43}, number={11}, journal={European Taxation}, publisher={International Bureau of Fiscal Documentation}, author={Anderson, Lisa}, year={2003}, pages={427-429} }

@article{Arnold_1985a, address={London}, title={The Taxation of Controlled Foreign Corporations: Defining and Designating Tax Havens II}, volume={6}, journal={British Tax Review}, publisher={Sweet and Maxwell}, author={Arnold, B. J.}, year={1985}, pages={362-376} }

@article{Arnold_1985b, address={London}, title={The Taxation of Controlled Foreign Corporations: Defining and Designating Tax Havens}, volume={5}, journal={British tax review}, publisher={Sweet and Maxwell}, author={Arnold, Brian J.}, year={1985}, pages={286-305} }

@book{Arnold, Brian J._McIntyre, Michael J._2002, address={The Hague}, edition={2nd ed}, title={International tax primer}, publisher={Kluwer Law International}, author={Arnold, Brian J. and McIntyre, Michael J.}, year={2002} }

@book{Arnold_McIntyre_2002a, address={The Hague}, edition={2nd ed}, title={International tax primer}, publisher={Kluwer Law International}, author={Arnold, Brian J. and McIntyre, Michael J.}, year={2002} }

@book{Arnold_McIntyre_2002b, address={The Hague}, edition={2nd ed}, title={International tax primer}, publisher={Kluwer Law International}, author={Arnold, Brian J. and McIntyre, Michael J.}, year={2002} }

@book{Arnold_McIntyre_2002c, address={The Hague}, edition={2nd ed}, title={International tax primer}, publisher={Kluwer Law International}, author={Arnold, Brian J. and McIntyre, Michael J.}, year={2002} }

@article{Arthur Pleisier_2001, address={Netherlands}, title={The Agency Permanent Establishment: The Current Definition – Part One}, volume={29},

url={<http://0-www.kluwerlawonline.com.pugwash.lib.warwick.ac.uk/document.php?id=333272>} , number={5} , journal={Intertax} , publisher={Kluwer Law International} , author={Arthur Pleisier} , year={2001} , pages={167-183} }

@article{Ault_Sasseville_2009, address={Amsterdam} , title={The New Arbitration Provision} , volume={63} , number={5} , journal={Bulletin for international taxation} , publisher={IBFD} , author={Ault, H. and Sasseville, J.} , year={2009} }

@article{Avery Jones_1984, title={The Interpretation of Tax Treaties with Particular Reference to Article 3(2) of the OECD Model- II} , volume={2} , url={<https://contentstore.cla.co.uk/secure/link?id=11e2e180-8243-e611-80bd-0cc47a6bdd>} , journal={British Tax Review} , author={Avery Jones, J. F.} , year={1984} , pages={90-108} }

@article{Avery-Jones_1984, address={London} , title={The Interpretation of Tax Treaties with particular reference to Article 3(2) of the OECD Model} , url={<https://contentstore.cla.co.uk/secure/link?id=10e2e180-8243-e611-80bd-0cc47a6bdd>} , number={1} , journal={British Tax Review} , publisher={Sweet and Maxwell} , author={Avery-Jones, J.} , year={1984} , pages={14-54} }

@article{Avi-Yonah, Reuven S._1995, address={United States} , title={Rise and Fall of Arm's Length: A Study in the Evolution of U.S. International Taxation, The} , volume={15} , url={<http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/vrgtr15&id=99&collection=journals&index=journals/vrgtr>} , journal={Virginia Tax Review} , publisher={Virginia Tax Review Association} , author={Avi-Yonah, Reuven S.} , year={1995} , pages={89-159} }

@book{Baker_2001, address={London} , title={Double taxation conventions: a manual on the OECD model tax convention on income and on capital} , publisher={Sweet & Maxwell} , author={Baker, Philip} , year={2001} }

@article{Bartlett_1991, address={London} , title={The Making of Double Taxation Agreements} , url={<https://contentstore.cla.co.uk/secure/link?id=b658c807-8343-e611-80bd-0cc47a6bdd>} , journal={British tax review} , publisher={Sweet & Maxwell} , author={Bartlett, R. T.} , year={1991} , pages={76-85} }

@book{Bond_Institute for Fiscal Studies (Great Britain)_2000, address={London} , title={Corporate tax harmonisation in Europe: a guide to the debate} , publisher={Institute for Fiscal Studies} , author={Bond, Stephen and Institute for Fiscal Studies (Great Britain)} , year={2000} }

@book{Bovenberg_1992, address={Dordrecht} , title={Harmonization of company taxation in the European Community: some comments on the Ruding Committee Report} , volume={European fiscal studies} , publisher={Kluwer} , author={Bovenberg, Ary Lans} , year={1992} }

@article{Bowett_1983, address={United Kingdom} , title={Jurisdiction: Changing Patterns of Authority over Activities and Resources} , volume={53} , url={<https://contentstore.cla.co.uk/secure/link?id=e9c5e83b-8543-e611-80bd-0cc47a6bdd>} , number={1} , journal={British Yearbook of International Law} , publisher={Oxford}

University Press}, author={Bowett, D. W.}, year={1983}, pages={1-26} }

@article{Brian J. Arnold._1995, address={Publishers' fax no: 020 7449 1144}, title={The Canadian general anti-avoidance rule}, url={http://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5C0BDD80E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI0DA758A0E74D11DAB6EDAFABAD7D114%26src%3Dtoc%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D26&crumb-action=append&context=32}, journal={British Tax Review}, publisher={Sweet & Maxwell}, author={Brian J. Arnold.}, year={1995}, pages={541-556} }

@book{Brokelind_2007, address={Amsterdam}, title={Towards a homogeneous EC direct tax law: an assessment of the member states' responses to the ECJ's case law}, publisher={IBFD}, author={Brokelind, Cécile}, year={2007} }

@article{B.Zagaris, address={Amsterdam}, title={The 1994 caricom double taxation agreement: A new model for regional integration and fiscal co-operation}, journal={Bulletin for international taxation}, publisher={International Bureau of Fiscal Documentation}, author={B.Zagaris}, pages={409-412} }

@article{C. Gaston Perera_1993, address={United Kingdom}, title={Double tax treaties in the Eastern Caribbean}, url={http://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5C1B6DE1E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9FF1EC60E72111DA9D198AF4F85CA028%26src%3Dtoc%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D30&crumb-action=append&context=31}, number={5}, journal={British Tax Review}, publisher={Sweet & Maxwell Ltd.}, author={C. Gaston Perera}, year={1993}, pages={395-400} }

@misc{Commission of the European Communities_23AD, title={COM(2001)582: Towards an Internal Market without tax obstacles A strategy for providing companies with a consolidated corporate tax base for their EU-wide activities}, url={http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2001:0582:FIN:EN:PDF}, author={Commission of the European Communities}, year={23AD} }

@misc{Commission of The European Communities_26AD, title={European Commission's adoption of COM (2007) 71 final}, url={http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0071:FIN:EN:PDF}, author={Commission of The European Communities}, year={26AD} }

@book{Commission of the European Communities_1992a, address={Luxembourg}, title={Report of the Committee of Independent Experts on Company Taxation}, publisher={Office for Official Publications of the European Communities}, author={Commission of the European Communities}, year={1992} }

@book{Commission of the European Communities_1992b, address={Luxembourg}, title={Report of the Committee of Independent Experts on Company Taxation}, publisher={Office for Official Publications of the European Communities}, author={Commission of the European Communities}, year={1992} }

@misc{Commission of the European Communities._1992, title={Conclusions and

recommendations of the Committee of Independent Experts on Company Taxation}, url={http://aei.pitt.edu/1332/1/ruding_tax_report.pdf}, publisher={Sales and subscriptions, UNIPUB}, author={Commission of the European Communities.}, year={1992} }

@book{Cooper_Australian Tax Research Foundation_1997, address={Amsterdam}, title={Tax avoidance and the rule of law}, publisher={IBFD Publications BV in association with the Australian Tax Research Foundation}, author={Cooper, Graeme S. and Australian Tax Research Foundation}, year={1997} }

@misc{Council of the European Union_20AD, address={Luxembourg}, title={Council Directive 90/435/EEC of 23 July 1990 on the common system of taxation applicable in the case of parent companies and subsidiaries of different Member States}, url={http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L._1990.225.01.0006.01.ENG}, number={OJ L 225}, journal={Official Journal European Union}, publisher={European Commission * Office for Official Publications of the European Union}, author={Council of the European Union}, year={20AD}, pages={6-9} }

@misc{Council of the European Union_25AD, address={Luxembourg}, title={Council Directive 2009/133/EC of 19 October 2009 on the common system of taxation applicable to mergers, divisions, partial divisions, transfers of assets and exchanges of shares concerning companies of different Member States and to the transfer of the registered office of an SE or SCE between Member States}, url={http://eur-lex.europa.eu/legal-content/EN/NOT/?uri=uriserv:OJ.L._2009.310.01.0034.01.ENG}, number={OJ L 310}, journal={Official Journal European Union}, publisher={European Commission * Office for Official Publications of the European Union}, author={Council of the European Union}, year={25AD}, pages={34-46} }

@misc{Council of the European Union_26AD, address={Luxembourg}, title={Council Directive 2003/49/EC of 3 June 2003 on a common system of taxation applicable to interest and royalty payments made between associated companies of different Member States}, url={http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L._2003.157.01.0049.01.ENG}, number={OJ L 157}, journal={Official Journal European Union}, publisher={European Commission * Office for Official Publications of the European Union}, author={Council of the European Union}, year={26AD}, pages={49-54} }

@misc{Council of the European Union_29AD, address={Luxembourg}, title={Council Directive 2011/96/EU of 30 November 2011 on the common system of taxation applicable in the case of parent companies and subsidiaries of different Member States}, url={http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L._2011.345.01.0008.01.ENG}, number={OJ L 345}, journal={Official Journal European Union}, publisher={European Commission * Office for Official Publications of the European Union}, author={Council of the European Union}, year={29AD}, pages={8-16} }

@misc{Council of the European Union_1990, address={Luxembourg}, title={Council Directive 90/434/EEC of 23 July 1990 on the common system of taxation applicable to mergers, divisions, transfers of assets and exchanges of shares concerning companies of different Member States}, url={http://eur-lex.europa.eu/legal-content/EN/NOT/?uri=uriserv:OJ.L._1990.225.01.0001.01.ENG}, number={OJ L 225}, journal={Official Journal European Union},

publisher={European Commission * Office for Official Publications of the European Union},
author={Council of the European Union}, year={1990} }

@article{D.A. Ward et al._1985, address={London}, title={The business purpose test and the abuse of rights}, volume={2},
url={https://contentstore.cla.co.uk/secure/link?id=12990c55-e043-e611-80bd-0cc47a6bdd
eb}, journal={British tax review}, publisher={Sweet and Maxwell}, author={D.A. Ward et
al.}, year={1985}, pages={68-123} }

@article{Dagan, Tsilly_1998, address={United States}, title={National Interests in the International Tax Game}, volume={18},
url={http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/vr
gtr18&id=373&collection=journals&index=journals/vrgtr}, journal={Virginia Tax Review},
publisher={Virginia Tax Review Association}, author={Dagan, Tsilly}, year={1998},
pages={363-416} }

@article{Dagan, Tsilly_1999, address={United States}, title={Tax Treaties Myth, The},
volume={32},
url={http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/ny
uilm32&id=949&collection=journals&index=journals/nyuilm}, journal={New York
University Journal of International Law and Politics}, publisher={New York University
School of Law}, author={Dagan, Tsilly}, year={1999}, pages={939-996} }

@article{Daniel Sandler_1994, address={United Kingdom}, title={Slicing the shadow -
the continuing debate over unitary taxation and worldwide combined reporting},
volume={6},
url={https://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5C15EFA1E7
1211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3
DI9FED0A60E72111DA9D198AF4F85CA028%26src%3Dtoc%26access-method%3Dtoc%2
6crumb-action%3Dappend%26context%3D6&crumb-action=append&context=7},
journal={British Tax Review}, publisher={Sweet & Maxwell Ltd.}, author={Daniel
Sandler}, year={1994}, pages={572-597} }

@article{Deane, K.D._1984, address={United Kingdom}, title={Law, Morality and Tax
Evasion}, volume={13},
url={http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/co
mlwr13&id=11&collection=journals&index=journals/comlwr}, journal={Anglo-American
Law Review}, publisher={Sage Publications Ltd.}, author={Deane, K.D.}, year={1984},
pages={1-15} }

@book{Devereux, M. P._1996, address={Oxford}, title={The economics of tax policy},
publisher={Oxford University Press}, author={Devereux, M. P.}, year={1996} }

@book{Devereux_Pearson_Institute for Fiscal Studies (Great Britain)_1989,
address={London}, title={Corporate tax harmonisation and economic efficiency},
volume={IFS report series}, publisher={Institute for Fiscal Studies}, author={Devereux,
M. P. and Pearson, Mark and Institute for Fiscal Studies (Great Britain)}, year={1989} }

@book{Easson_1993, address={London}, title={Taxation in the European Community},
volume={European Community law series}, publisher={Athlone}, author={Easson, A. J.},
year={1993} }

@article{Easson_2000, address={Amsterdam}, title={Do we still need tax treaties?}, volume={54}, url={https://arlr.iii.com/nonret~S0&atitle=Do+we+still+need+tax+treaties?&title=Bulletin+for+international+taxation&aufirst=Alex&auinit=&aulast=Easson&issn=00074624&eissn=&coden=&volume=54&issue=12&spage=619&epage=625&quarter=&ssn=&date=2000&sid=&reqtype3}, number={12}, journal={Bulletin for international taxation}, publisher={International Bureau of Fiscal Documentation}, author={Easson, Alex}, year={2000}, pages={619-625} }

@misc{European Commission_11AD, title={COM (2011) 714 final: Proposal for a Council Directive on a common system of taxation applicable to interest and royalty payments made between associated companies of different Member States (recast)}, url={http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0714:FIN:EN:PDF}, author={European Commission}, year={11AD} }

@misc{European Commission_2006, title={COM(2006)823 final: Communication from the Commission to the Council, the European Parliament and the European Economic and Social Committee - Co-ordinating Member States' direct tax systems in the Internal Market}, url={http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52006DC0823}, author={European Commission}, year={2006}, month={Dec} }

@misc{European Commission, title={Towards an Internal Market without Tax Obstacles – A strategy for providing companies with a consolidated corporate tax base for their EU-wide activities}, url={http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2001:0582:FIN:EN:PDF}, author={European Commission} }

@misc{European commission, title={Transfer Pricing and the Arbitration Convention}, url={http://ec.europa.eu/taxation_customs/taxation/company_tax/transfer_pricing/arbitration_convention/index_en.htm}, author={European commission} }

@misc{European commission, title={Joint Transfer Pricing Forum}, url={http://ec.europa.eu/taxation_customs/taxation/company_tax/transfer_pricing/forum/index_en.htm}, author={European commission} }

@book{Farmer_Lyal_1994, address={Oxford}, title={EC tax law}, volume={Oxford European Community law series}, publisher={Clarendon Press}, author={Farmer, Paul and Lyal, Richard}, year={1994} }

@article{Freiburg_1988, title={Ripples from the bottom of the harbour: some social ramifications of taxation fraud}, volume={12}, journal={Criminal Law Journal}, author={Freiburg, A.}, year={1988}, pages={136-192} }

@book{Gassner_Lang_Lechner_1997a, address={London}, title={Tax treaties and EC law}, volume={Series on international taxation}, publisher={Kluwer Law}, author={Gassner, Wolfgang and Lang, Michael and Lechner, Eduard}, year={1997} }

@book{Gassner_Lang_Lechner_1997b, address={London}, title={Tax treaties and EC law}, volume={Series on international taxation}, publisher={Kluwer Law}, author={Gassner, Wolfgang and Lang, Michael and Lechner, Eduard}, year={1997} }

@article{George Cooper_1985, address={United States}, title={The Taming of the Shrewd: Identifying and Controlling Income Tax Avoidance}, volume={85}, url={http://0-www.jstor.org.pugwash.lib.warwick.ac.uk/stable/1122332}, number={4}, journal={Columbia Law Review}, publisher={Columbia Law Review Association, Inc.}, author={George Cooper}, year={1985}, pages={657-729} }

@article{Giuseppe Persico_2000, address={Netherlands}, title={Agency Permanent Establishment under Article 5 of the OECD Model Convention}, volume={28}, url={http://0-www.kluwerlawonline.com.pugwash.lib.warwick.ac.uk/document.php?id=262072}, number={2}, journal={Intertax}, publisher={Kluwer Law International}, author={Giuseppe Persico}, year={2000}, pages={66-81} }

@article{Gouthière_2011, address={Amsterdam}, title={Key Practical Issues in Eliminating the Double Taxation of Business Income}, volume={65}, number={4/5}, journal={Bulletin for international taxation}, publisher={IBFD: International Bureau of Fiscal Documentation}, author={Gouthière, B.}, year={2011} }

@misc{Graham Aaronson, title={A Study to consider whether a general anti-avoidance rule should be introduced into the UK Tax System}, url={http://webarchive.nationalarchives.gov.uk/20130129110402/http://www.hm-treasury.gov.uk/d/gaar_final_report_111111.pdf}, author={Graham Aaronson} }

@book{Gray_1983a, address={London}, title={International accounting and transnational decisions}, publisher={Butterworth}, author={Gray, S. J.}, year={1983} }

@book{Gray_1983b, address={London}, title={International accounting and transnational decisions}, publisher={Butterworth}, author={Gray, S. J.}, year={1983} }

@book{Great Britain_1998, address={London}, title={Taxation and competition policy in the single market: with evidence : 28th report, session 1997-98}, volume={[HL] [1997-98]}, publisher={Stationery Office}, author={Great Britain}, year={1998} }

@book{Hague Academy of International Law., title={Recueil Des Cours, Collected Courses (Vol 111): The Doctrine of Jurisdiction in International Law}, volume={111}, url={http://www.nijhoffonline.nl/book?id=er111_er111_001-162}, publisher={Kluwer Law International}, author={Hague Academy of International Law.} }

@book{Hague Academy of International Law., title={Recueil Des Cours, 1984 (Vol 186) The Doctrine of International Jurisdiction Revisited after Twenty Years}, volume={186}, url={http://www.nijhoffonline.nl/book?id=er186_er186_009-116}, publisher={Kluwer Law International}, author={Hague Academy of International Law.} }

@article{Hamaekers_1992, address={Amsterdam}, title={The Arm's Length Principle and the Role of Comparables}, volume={46}, url={https://arlir.iii.com/nonret~S0&#atitle=The+Arm's+Length+Principle+and+the+Role+of+Comparables&#title=Bulletin+for+international+fiscal+documentation&#;aufirst=H.M.A.L.&#auinit=&#aulast=Hamaekers&#issn=&#eissn=&#co den=&#volume=46&#issue=12&#spage=602&#epage=605&#quarter=&#ssn=&#date=1992&#sid=&#reqtype3}, number={12},

journal={Bulletin for international fiscal documentation}, publisher={IBFD}, author={Hamaekers, H.M.A.L.}, year={1992}, pages={602-605} }

@article{Heather Self_1995, address={[London]}, title={OECD Transfer Guidelines: Part II}, url={https://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=15C09E1B0E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9FE59050E72111DA9D198AF4F85CA028%26src%3Dtoce%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D14&crumb-action=append&context=15}, number={4}, journal={British tax review}, publisher={[Sweet and Maxwell]}, author={Heather Self}, year={1995}, pages={358-362} }

@article{Helen Rogers_Lynne Oats_2013, address={[London]}, title={The use of advance pricing agreements in transfer pricing management}, url={https://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=1FAAB7EE181D011E2B140B87BA827003F&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI2A12B58182EF11E290C285126984B05B%26src%3Dtoce%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D7&crumb-action=append&context=8}, number={1}, journal={British tax review}, publisher={[Sweet and Maxwell]}, author={Helen Rogers and Lynne Oats}, year={2013}, pages={76-94} }

@article{van Herksen_1996, address={Amsterdam}, title={Limitation on Benefits and the Competent Authority Determination}, volume={50}, number={1}, journal={Bulletin for international fiscal documentation}, publisher={International Bureau of Fiscal Documentation}, author={van Herksen, Monique}, year={1996}, pages={19-28} }

@book{Holmes, Kevin_2007, address={Amsterdam}, title={International tax policy and double tax treaties: an introduction to principles and application}, publisher={IBFD}, author={Holmes, Kevin}, year={2007} }

@book{Holmes_2007a, address={Amsterdam}, title={International tax policy and double tax treaties: an introduction to principles and application}, publisher={IBFD}, author={Holmes, Kevin}, year={2007} }

@book{Holmes_2007b, address={Amsterdam}, title={International tax policy and double tax treaties: an introduction to principles and application}, publisher={IBFD}, author={Holmes, Kevin}, year={2007} }

@book{Holmes_2007c, address={Amsterdam}, title={International tax policy and double tax treaties: an introduction to principles and application}, publisher={IBFD}, author={Holmes, Kevin}, year={2007} }

@book{Holmes_2007d, address={Amsterdam}, title={International tax policy and double tax treaties: an introduction to principles and application}, publisher={IBFD}, author={Holmes, Kevin}, year={2007} }

@book{Holmes_2007e, address={Amsterdam}, title={International tax policy and double tax treaties: an introduction to principles and application}, publisher={IBFD}, author={Holmes, Kevin}, year={2007} }

@article{Iain P.A. Stitt_1993, address={United Kingdom}, title={Corporate taxation in

the E.C.},

url={

@book{James, S. R._Nobes, Christopher_2010, address={Birmingham}, edition={10th ed., 2010/2011}, title={The economics of taxation: principles, policy and practice}, publisher={Fiscal}, author={James, S. R. and Nobes, Christopher}, year={2010} }

@article{Jamie Elliott_1995, address={[London]}, title={Developments in transfer pricing}, url={

@article{Jessica J-M Hagen_1987, address={United States}, title={Constitutional Limits on State Tax Jurisdiction}, volume={87}, url={<http://0-www.jstor.org.pugwash.lib.warwick.ac.uk/stable/1122589>}, number={6}, journal={Columbia Law Review}, publisher={Columbia Law Review Association, Inc.}, author={Jessica J-M Hagen}, year={1987}, pages={1238-1257} }

@article{Jezzi_2010, address={Amsterdam}, title={The Concept of Beneficial Ownership in the Indofood and Prevost Car decisions}, volume={64}, number={5}, journal={Bulletin for international taxation}, publisher={IBFD}, author={Jezzi, PL}, year={2010} }

@article{John Tiley_1987a, address={United Kingdom}, title={Judicial anti-avoidance doctrines: the US alternatives - Part 1}, url={

@article{John Tiley_1987b, address={United Kingdom}, title={Judicial anti-avoidance doctrines: the US alternatives - Part 2}, url={

number={6}, journal={British Tax Review}, publisher={Sweet & Maxwell Ltd.}, author={John Tiley}, year={1987}, pages={220-244} }

@article{Judith Freedman._2004, address={Publishers' fax no: 020 7449 1144}, title={Defining taxpayer responsibility: in support of a general anti avoidance principle.}, url={http://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5B9EC3D0E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9F8C73D0E72111DA9D198AF4F85CA028%26src%3Dtoce%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D40&crumb-action=append&context=46}, journal={British Tax Review}, publisher={Sweet & Maxwell}, author={Judith Freedman.}, year={2004}, pages={332-357} }

@article{Kandev, address={Amsterdam}, title={Treaty Shopping in Canada: The Door is (still) open}, volume={62}, number={10}, journal={Bulletin for international taxation}, publisher={IBFD: International Bureau of Fiscal Documentation}, author={Kandev, Michael N.}, pages={463-470} }

@book{Kay, J. A._King, Mervyn A._1990, address={Oxford}, edition={5th ed}, title={The British tax system}, publisher={Oxford University Press}, author={Kay, J. A. and King, Mervyn A.}, year={1990} }

@book{Kiekebeld_Foundation for European Fiscal Studies_2004, address={[The Netherlands]}, title={Harmful tax competition in the European Union: code of conduct, countermeasures and EU law}, volume={EFS (Series)}, publisher={Kluwer}, author={Kiekebeld, Ben J. and Foundation for European Fiscal Studies}, year={2004} }

@book{Kiesling, Herbert J._1992, address={Ann Arbor}, title={Taxation and public goods: a welfare-economic critique of tax policy analysis}, publisher={University of Michigan Press}, author={Kiesling, Herbert J.}, year={1992} }

@article{Kornikova, Anna A._2008, address={United States}, title={Solving the Problem of Tax-Treaty Shopping through the Use of Limitation on Benefits Provisions}, volume={8}, url={http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/rjnglbs8&id=259&collection=journals&index=journals/rjnglbs}, journal={Richmond Journal of Global Law and Business}, publisher={University of Richmond * School of Law}, author={Kornikova, Anna A.}, year={2008}, pages={249-286} }

@article{Lall_1979, address={United Kingdom}, title={Transfer pricing and developing countries: Some problems of investigation}, volume={7}, url={http://0-doi.org.pugwash.lib.warwick.ac.uk/10.1016/0305-750X(79)90008-1}, DOI={10.1016/0305-750X(79)90008-1}, number={1}, journal={World Development}, publisher={Pergamon Press}, author={Lall, Sanjaya}, year={1979}, pages={59-71} }

@book{Lang_2001, address={Hague}, title={Tax treaty interpretation}, volume={Eucotax series on European taxation}, publisher={Kluwer Law International}, author={Lang, Michael}, year={2001} }

@book{Lang_Court of Justice of the European Communities_2002, address={Wien}, title={Direct taxation: recent ECJ developments}, volume={Schriftenreihe zum internationalen Steuerrecht}, publisher={Linde Verlag}, author={Lang, Michael and Court

of Justice of the European Communities}, year={2002} }

@book{Lang_Schuch_Staringer_Eucotax_2006, address={The Hague}, title={ECJ- -recent developments in direct taxation}, volume={Eucotax series on European taxation}, publisher={Kluwer Law International}, author={Lang, Michael and Schuch, Josef and Staringer, Claus and Eucotax}, year={2006} }

@book{Lee, address={Bloomsbury Publishing, 2014}, edition={32nd ed}, title={Revenue law}, author={Lee, Natalie} }

@book{Lee, address={Bloomsbury Publishing, 2014}, edition={32nd ed}, title={Revenue law}, author={Lee, Natalie} }

@book{Lier_1993, address={Deventer}, title={Tax and legal aspects of EC harmonisation}, publisher={Kluwer}, author={Lier, A. Peter}, year={1993} }

@article{de Lignie_1995, address={Amsterdam}, title={Limitation on Benefits: Recently Signed US Treaties Compared to the 1992}, volume={49}, number={2}, journal={Bulletin for international fiscal documentation}, publisher={International Bureau of Fiscal Documentation}, author={de Lignie, Marco}, year={1995}, pages={71-77} }

@article{Luc Hinnekens._1996a, address={Publishers' fax no: 020 7449 1144}, title={The European Tax Arbitration Convention and its legal framework: Part 1.}, url={http://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5BEBF970E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9FDF4EC0E72111DA9D198AF4F85CA028%26src%3Dtoce%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D33&crumb-action=append&context=34}, journal={British Tax Review}, publisher={Sweet & Maxwell}, author={Luc Hinnekens.}, year={1996}, pages={132-154} }

@article{Luc Hinnekens._1996b, address={Publishers' fax no: 020 7449 1144}, title={The European Tax Arbitration Convention and its legal framework: Part 2.}, url={http://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5BEC2080E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9FDF4EC1E72111DA9D198AF4F85CA028%26src%3Dtoce%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D37&crumb-action=append&context=43}, journal={British Tax Review}, publisher={Sweet & Maxwell}, author={Luc Hinnekens.}, year={1996}, pages={272-311} }

@book{Maisto_2007a, address={Amsterdam}, title={Courts and tax treaty law}, volume={EC and international tax law series}, publisher={IBFD}, author={Maisto, Guglielmo}, year={2007} }

@book{Maisto_2007b, address={Amsterdam}, title={Courts and tax treaty law}, volume={EC and international tax law series}, publisher={IBFD}, author={Maisto, Guglielmo}, year={2007} }

@misc{Malcolm Gammie_1992, address={London}, title={The Ruding Committee report: an initial response}, url={http://www.ifs.org.uk/comms/comm30.pdf}, publisher={Institute for Fiscal Studies}, author={Malcolm Gammie}, year={1992} }

@article{ Malcolm J. Gammie_2001, address={United Kingdom}, title={Corporate taxation in Europe - paths to a solution}, url={https://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5BB55910E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9FA10D40E72111DA9D198AF4F85CA028%26src%3Dtoce%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D21&crumb-action=append&context=22}, number={4}, journal={British Tax Review}, publisher={Sweet & Maxwell Ltd.}, author={Malcolm J. Gammie}, year={2001}, pages={233-249} }

@book{ Martha, Rutsel Silvestre J._1989, address={Deventer, The Netherlands}, title={The jurisdiction to tax in international law: theory and practice of legislative fiscal jurisdiction}, volume={Series on international taxation}, publisher={Kluwer Law and Taxation Publishers}, author={Martha, Rutsel Silvestre J.}, year={1989} }

@article{ Martín Jiménez_2002a, address={Amsterdam}, title={Domestic Anti-abuse Rules and Double Taxation Treaties: A Spanish Perspective--Part I}, volume={56}, url={https://ssrn.com/abstract=2471818}, number={11}, journal={Bulletin for international fiscal documentation}, publisher={International Bureau of Fiscal Documentation}, author={Martín Jiménez, Adolfo J.}, year={2002}, pages={542-553} }

@article{ Martín Jiménez_2002b, address={Amsterdam}, title={Domestic Anti-abuse Rules and Double Taxation Treaties: A Spanish Perspective--Part II}, volume={56}, url={https://ssrn.com/abstract=2471826}, number={12}, journal={Bulletin for international fiscal documentation}, publisher={International Bureau of Fiscal Documentation}, author={Martín Jiménez, Adolfo J.}, year={2002}, pages={620-627} }

@article{ McClure _2002, address={Amsterdam}, title={Replacing separate entity accounting and the arms length principle with formulary apportionment}, volume={56}, url={https://arlier.iii.com/nonret~S0&atitle=Replacing+separate+entity+accounting+and+the+arms+length+principle+with+formulary+apportionment&title=Bulletin+for+international+taxation&aufirst=C.&auinit=&aulast=McClure&issn=00074624&eissn=&coden=&volume=56&issue=12&spage=586&epage=599&quarter=&ssn=&date=2002&sid=&reqtype3}, number={12}, journal={Bulletin for international taxation}, publisher={IBFD: International Bureau of Fiscal Documentation}, author={McClure, C.}, year={2002}, pages={586-599} }

@article{ McGarry, Stephen J._1988, address={United States}, title={State of Mind Standards in Taxation}, volume={7}, url={http://0-heinonline.org.pugwash.lib.warwick.ac.uk/HOL/Page?handle=hein.journals/ajtp7&id=255&collection=journals&index=journals/ajtp}, journal={American Journal of Tax Policy}, publisher={American College of Tax Counsel}, author={McGarry, Stephen J.}, year={1988}, pages={249-304} }

@article{ Michael B. Squires_1994, address={[London]}, title={Controlled foreign companies - taxed by legislation, untaxed by Tax Bulletin?}, url={https://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5C0FAE10E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Faccess-method%3Dtoc%26docguid%3DI8100F3C1E45411DA92358E85EE602D8A%26src%3Dtoce%26crumb-action%3Dappend%26context%3D21&crumb-action=append&context=22}, number={4}, journal={British Tax Review}, publisher={Sweet & Maxwell Ltd.}, author={Michael B. Squires}, year={1994}, pages={233-249} }

6crumb-action%3Dappend%26context%3D5&crumb-action=append&context=6},
number={5}, journal={British tax review}, publisher={[Sweet and Maxwell]},
author={Michael B. Squires}, year={1994}, pages={413-418} }

@book{Miller_Oats_2014a, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014b, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014c, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014d, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014e, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014f, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014g, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@book{Miller_Oats_2014h, address={Haywards Heath, West Sussex}, edition={Fourth
edition}, title={Principles of international taxation}, publisher={Bloomsbury
Professional}, author={Miller, Angharad and Oats, Lynne}, year={2014} }

@article{M.Stirling_3AD, address={United Kingdom}, title={Global attitudes towards
transfer pricing},
url={http://0-www.lexisnexis.com.pugwash.lib.warwick.ac.uk/uk/legal/search/journalssubm
itForm.do}, journal={Tax Journal}, publisher={LexisNexis Butterworths},
author={M.Stirling}, year={3AD} }

@book{Muchlinski_2007a, address={Oxford}, edition={2nd ed}, title={Multinational
enterprises and the law}, volume={The Oxford international law library},
publisher={Oxford University Press}, author={Muchlinski, Peter}, year={2007} }

@book{Muchlinski_2007b, address={Oxford}, edition={2nd ed}, title={Multinational
enterprises and the law}, volume={Oxford International Law Library},
url={http://warw.eblib.com/patron/FullRecord.aspx?p=1573064}, publisher={Oxford
University Press}, author={Muchlinski, Peter T.}, year={2007} }

@book{ Musgrave, Richard A._Musgrave, Peggy B._1989, address={New York},
edition={5th ed}, title={Public finance in theory and practice}, publisher={McGraw-Hill},
author={Musgrave, Richard A. and Musgrave, Peggy B.}, year={1989} }

@misc{OECD_22AD, title={OECD Model},
url={http://www.oecd.org/tax/treaties/47213736.pdf}, author={OECD}, year={22AD} }
@misc{OECD_2002, title={Model Agreement on Exchange of Information on Tax
Matters}, url={http://www.oecd.org/ctp/harmful/2082215.pdf}, author={OECD},
year={2002} }

@misc{OECD, title={Improving the Resolution of Tax Treaty Disputes},
url={http://www.oecd.org/fr/ctp/resolution/38093485.pdf}, author={OECD} }

@book{Ogley_1993a, address={London}, title={The principles of international tax: a
multinational perspective}, publisher={Interfisc Publishing}, author={Ogley, Adrian},
year={1993} }

@book{Ogley_1993b, address={London}, title={The principles of international tax: a
multinational perspective}, publisher={Interfisc Publishing}, author={Ogley, Adrian},
year={1993} }

@book{Ogley_1993c, address={London}, title={The principles of international tax: a
multinational perspective}, publisher={Interfisc Publishing}, author={Ogley, Adrian},
year={1993} }

@book{Organisation for Economic Co-operation and Development_1984,
address={Paris}, title={Transfer pricing and multinational enterprises: three taxation
issues}, publisher={Organisation for Economic Co-operation and Development},
author={Organisation for Economic Co-operation and Development}, year={1984} }

@book{Organisation for Economic Co-operation and Development_1987,
address={Paris}, title={International tax avoidance and evasion: four related studies},
volume={Issues in international taxation}, publisher={Organization for Economic
Co-operation and Development}, author={Organisation for Economic Co-operation and
Development}, year={1987} }

@book{Organisation for Economic Co-operation and Development_1991,
address={Paris}, title={Taxing profits in a global economy: domestic and international
issues}, publisher={Organisation for Economic Co-operation and Development},
author={Organisation for Economic Co-operation and Development}, year={1991} }

@book{Organisation for Economic Co-operation and Development_1993,
address={Paris}, title={Tax aspects of transfer pricing within multinational enterprises:
the United States proposed regulations : a report by the Committee on Fiscal Affairs on
the proposed regulations under Section 482 IRC.}, volume={OECD documents},
publisher={OECD}, author={Organisation for Economic Co-operation and Development},
year={1993} }

@book{Organisation for Economic Co-operation and Development_1996,
address={Paris}, title={Controlled foreign company legislation}, volume={Studies in
taxation of foreign source income}, publisher={OECD}, author={Organisation for

Economic Co-operation and Development}, year={1996} }

@book{Organisation for Economic Co-operation and Development_1998a, address={Paris}, title={Harmful tax competition: an emerging global issue}, publisher={OECD}, author={Organisation for Economic Co-operation and Development}, year={1998} }

@book{Organisation for Economic Co-operation and Development_1998b, address={Paris}, title={Harmful tax competition: an emerging global issue}, publisher={OECD}, author={Organisation for Economic Co-operation and Development}, year={1998} }

@book{Organisation for Economic Co-operation and Development_2001, address={Paris}, title={Transfer pricing guidelines for multinational enterprises and tax administrations}, publisher={OECD}, author={Organisation for Economic Co-operation and Development}, year={2001} }

@book{Organisation for Economic Co-operation and Development_2013, address={Paris}, title={Addressing Base Erosion and Profit Shifting}, url={http://0-dx.doi.org.pugwash.lib.warwick.ac.uk/10.1787/9789264192744-en}, publisher={OECD Publishing}, author={Organisation for Economic Co-operation and Development}, year={2013} }

@book{O'Shea_2008, address={London}, title={EU tax law and double tax conventions}, publisher={Avoir Fiscal Ltd}, author={O'Shea, Tom}, year={2008} }

@misc{P. Baker, title={Beneficial Ownership after Indofood}, url={http://www.taxbar.com/documents/Beneficial_Ownership_PB.pdf}, author={P. Baker} }

@book{Picciotto, Sol_1992, address={London}, title={International business taxation: a study in the internationalization of business regulation}, volume={Law in context}, publisher={Weidenfeld & Nicolson}, author={Picciotto, Sol}, year={1992} }

@book{Picciotto_1992a, address={London}, title={International business taxation: a study in the internationalization of business regulation}, volume={Law in context}, publisher={Weidenfeld & Nicolson}, author={Picciotto, Sol}, year={1992} }

@book{Picciotto_1992b, address={London}, title={International business taxation: a study in the internationalization of business regulation}, volume={Law in context}, publisher={Weidenfeld & Nicolson}, author={Picciotto, Sol}, year={1992} }

@book{Picciotto_1992c, address={London}, title={International business taxation: a study in the internationalization of business regulation}, volume={Law in context}, publisher={Weidenfeld & Nicolson}, author={Picciotto, Sol}, year={1992} }

@book{Picciotto_1992d, address={London}, title={International business taxation: a study in the internationalization of business regulation}, volume={Law in context}, publisher={Weidenfeld & Nicolson}, author={Picciotto, Sol}, year={1992} }

@book{Picciotto_1992e, address={London}, title={International business taxation: a

study in the internationalization of business regulation}, volume={Law in context}, publisher={Weidenfeld & Nicolson}, author={Picciotto, Sol}, year={1992} }

@article{Qureshi_1987a, address={Amsterdam}, title={The Freedom of a State to Legislate in Fiscal Matters under General International Law}, volume={1}, url={https://arlr.iii.com/nonret~S0&atitle=The+Freedom+of+a+State+to+Legislate+in+Fiscal+Matters+under+General+International+Law&title=Bulletin+for+international+fiscal+documentation&aufirst=A.&auinit=&aulast=Qureshi&issn=00074624&eissn=&coden=&volume=1&issue=&spage=14&epage=&quarter=&ssn=&date=1987&sid=&reqtype3}, journal={Bulletin for international fiscal documentation}, publisher={International Bureau of Fiscal Documentation}, author={Qureshi, A.}, year={1987} }

@book{Qureshi, Asif H._1994, address={London}, title={The public international law of taxation: text, cases and materials}, url={https://contentstore.cla.co.uk/secure/link?id=f9411969-a31b-e811-80cd-005056af4099}, publisher={Graham & Trotman}, author={Qureshi, Asif H.}, year={1994} }

@article{Qureshi_1987b, address={Amsterdam}, title={Unitary taxation and general international law}, volume={41}, url={https://arlr.iii.com/nonret~S0&atitle=Unitary+taxation+and+general+international+law&title=Bulletin+for+international+fiscal+documentation&aufirst=Asif+Hasan&auinit=&aulast=Qureshi&issn=&eissn=&coden=&volume=41&issue=2&spage=56&epage=65&quarter=&ssn=&date=1987&sid=&reqtype3}, number={2}, journal={Bulletin for international fiscal documentation}, publisher={IBFD}, author={Qureshi, Asif Hasan}, year={1987}, pages={56-65} }

@book{Raad, C. van _2011, address={Leiden}, edition={11th ed}, title={Materials on international & EC tax law}, publisher={International Tax Center}, author={Raad, C. van}, year={2011} }

@book{Razin_Slemrod_1990, address={Chicago}, title={Taxation in the global economy}, volume={A National Bureau of Economic Research project report}, publisher={University of Chicago Press}, author={Razin, Assaf and Slemrod, Joel}, year={1990} }

@book{Rohatgi, Roy _2005, address={Richmond}, edition={2nd ed}, title={Basic international taxation}, publisher={Richmond Law & Tax}, author={Rohatgi, Roy}, year={2005} }

@book{Rohatgi_2005a, address={Richmond}, edition={2nd ed}, title={Basic international taxation}, publisher={Richmond Law & Tax}, author={Rohatgi, Roy}, year={2005} }

@book{Rohatgi_2005b, address={Richmond}, edition={2nd ed}, title={Basic international taxation}, publisher={Richmond Law & Tax}, author={Rohatgi, Roy}, year={2005} }

@book{Rohatgi_2005c, address={Richmond}, edition={2nd ed}, title={Basic international taxation}, publisher={Richmond Law & Tax}, author={Rohatgi, Roy},

year={2005} }

@book{Rohatgi_2005d, address={Richmond}, edition={2nd ed}, title={Basic international taxation}, publisher={Richmond Law & Tax}, author={Rohatgi, Roy}, year={2005} }

@article{Sadiq_2001, address={Amsterdam}, title={Unitary taxation - The case for global formulary apportionment}, volume={55}, url={https://arlir.iii.com/nonret~S0&atitle=Unitary+taxation+The+case+for+global+formulary+apportionment&title=Bulletin+for+international+taxation&aufirst=K.&auinit=&aulast=Sadiq&issn=00074624&eissn=&coden=&volume=55&issue=7&spage=275&epage=286&quarter=&ssn=&date=2001&sid=&reqtype3}, number={7}, journal={Bulletin for international taxation}, publisher={IBFD: International Bureau of Fiscal Documentation}, author={Sadiq, K.}, year={2001}, pages={275-286} }

@book{Salter, David_Lee, Natalie_Snape, John_2007, address={Haywards Heath, West Sussex [England]}, title={Revenue law: text and materials}, publisher={Tottel Pub}, author={Salter, David and Lee, Natalie and Snape, John}, year={2007} }

@article{Sandra Eden_2000, address={United Kingdom}, title={Corporate tax harmonisation in the European Community}, url={https://login.westlaw.co.uk/maf/wluk/app/document?&src=ri&docguid=I5BBD2140E71211DA915EF37CAC72F838&refer=%2Fmaf%2Fwluk%2Fapp%2Fdocument%3Fdocguid%3DI9FA74ED0E72111DA9D198AF4F85CA028%26src%3Dtoc%26access-method%3Dtoc%26crumb-action%3Dappend%26context%3D13&crumb-action=append&context=14}, number={6}, journal={British Tax Review}, publisher={Sweet & Maxwell Ltd.}, author={Sandra Eden}, year={2000}, pages={624-652} }

@book{Schön_International Bureau of Fiscal Documentation_2003, address={Amsterdam}, title={Tax competition in Europe: edited by Wolfgang Schön}, publisher={IBFD}, author={Schön, Wolfgang and International Bureau of Fiscal Documentation}, year={2003} }

@book{Terra_Wattèl_2012, address={Alphen aan den Rijn, The Netherlands}, edition={6th ed., abridged student ed}, title={European tax law}, publisher={Kluwer Law International}, author={Terra, B. J. M. and Wattèl, Peter Jacob}, year={2012} }

@article{du Toit_2010, address={Amsterdam}, title={The Evolution of the term beneficial ownership in relation to taxation over the past 45 years}, volume={64}, number={10}, journal={Bulletin for international taxation}, publisher={IBFD}, author={du Toit, C.}, year={2010} }

@article{Trintalli_2002, address={Amsterdam}, title={Independent Legal Entities or Permanent Establishments? Recent Court Decisions and Anticipated Changes in the Law}, volume={42}, number={8}, journal={European taxation}, publisher={International Bureau of Fiscal Documentation}, author={Trintalli, F.}, year={2002}, pages={364-370} }

@article{Valente_Magenta_2000, address={Amsterdam}, title={Analysis of Certain Anti-Abuse Clauses in the Tax Treaties Concluded by Italy}, volume={54}, number={1},

journal={Bulletin for international fiscal documentation}, publisher={International Bureau of Fiscal Documentation}, author={Valente, Piergiorgio and Magenta, Marco}, year={2000}, pages={41-46} }

@article{Vogel_2000, address={Netherlands}, title={The Influence of the OECD Commentaries on Treaty Interpretation}, volume={54}, url={https://arlier.iii.com/nonret~S0&atitle=The+Influence+of+the+OECD+Commentaries+on+Treaty+Interpretation&title=Bulletin+for+international+taxation+/+IBFD&aufirst=K.&auinit=&aulast=Vogel&issn=00074624&eissn=&coden=&volume=54&issue=12&spage=612&epage=616&quarter=&ssn=&date=2000&sid=&reqtype3}, number={12}, journal={Bulletin for international taxation / IBFD}, publisher={International Bureau of Fiscal Documentation}, author={Vogel, K.}, year={2000}, pages={612-616} }

@book{Vogel_Engelschalk_1997, address={London}, edition={3rd ed}, title={Klaus Vogel on double taxation conventions: a commentary to the OECD-, UN-, and US model conventions for the avoidance of double taxation on income and capital with particular reference to German treaty practice}, publisher={Kluwer}, author={Vogel, Klaus and Engelschalk, Michael}, year={1997} }

@book{Williams_1998, address={London}, title={EC tax law}, volume={European law series}, publisher={Longman}, author={Williams, David W.}, year={1998} }

@book{Williams, David W._International Bureau of Fiscal Documentation_1991, address={Amsterdam}, title={Trends in international taxation}, publisher={International Bureau of Fiscal Documentation}, author={Williams, David W. and International Bureau of Fiscal Documentation}, year={1991} }

@book{Williams_International Bureau of Fiscal Documentation_1991, address={Amsterdam}, title={Trends in international taxation}, publisher={International Bureau of Fiscal Documentation}, author={Williams, David W. and International Bureau of Fiscal Documentation}, year={1991} }

@book{Williams, David W._Morse, Geoffrey_Davies, F. R._2008, address={London}, edition={6th ed}, title={Davies principles of tax law}, publisher={Sweet & Maxwell}, author={Williams, David W. and Morse, Geoffrey and Davies, F. R.}, year={2008} }

@misc{COM (2011) 121 final 2011/0058 (CNS): Proposal for a Council Directive on a Common Consolidated Corporate Tax Base (CCCTB)_16AD, url={http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0121:FIN:EN:PDF}, year={16AD} }

@misc{The Vienna Convention on the Law of Treaties_23AD, url={https://treaties.un.org/doc/Publication/UNTS/Volume%201155/volume-1155-I-18232-English.pdf}, year={23AD} }

@book{Tax By Design_2011, publisher={Oxford University Press}, year={2011} }

@misc{Transfer Pricing and the Arbitration Convention - European commission, url={http://ec.europa.eu/taxation_customs/taxation/company_tax/transfer_pricing/arbitration_convention/index_en.htm} }

@misc{OECD Model Convention on Income and on Capital,
url={<http://www.oecd.org/tax/treaties/47213736.pdf>} }

@misc{ Model Tax Convention on Income and on Capital 2010 (Full Version) | OECD READ edition,
url={http://www.keepeek.com/Digital-Asset-Management/oecd/taxation/model-tax-convention-on-income-and-on-capital-2010_9789264175181-en#page1} }

@misc{Transfer Pricing and the Arbitration Convention - European commission,
url={http://ec.europa.eu/taxation_customs/taxation/company_tax/transfer_pricing/arbitration_convention/index_en.htm} }