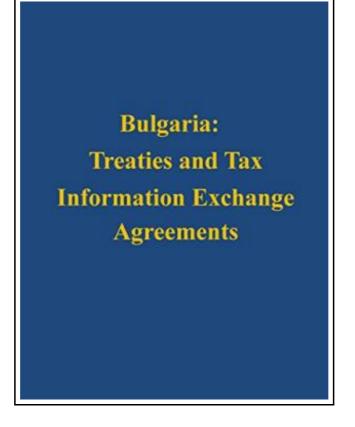
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(Prof. Greg Herzog)

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Createspace, United States, 2014. Paperback. Book Condition: New. 279 x 216 mm. Language: English . Brand New Book \*\*\*\*\* Print on Demand \*\*\*\*\*. This is a technical explanation of the Convention between the United States and Bulgaria for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income, signed on February 23, 2007, and the Protocol between the United States and Bulgaria signed on the same date (the Protocol), as amended by the Protocol between the United States and Bulgaria signed on February 26, 2008 (collectively, the Convention). The Protocol is discussed below in connection with the relevant articles of the Convention. Negotiations took into account the U.S. Treasury Department's current tax treaty policy, and the Treasury Department's Model Income Tax Convention, updated as of November 15, 2006. Negotiations also took into account the Model Tax Convention on Income and on Capital, published by the Organisation for Economic Cooperation and Development (the OECD Model), and recent tax treaties concluded by both countries. The Technical Explanation is an official guide to the Convention. It reflects the policies behind particular Convention provisions, as well as understandings reached during the negotiations with respect to the application and interpretation of the Convention. References in the Technical Explanation to he or his should be read to mean he or she or his and her.

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