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### KEY=IN - HAILEY QUINCY

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### THE CANADA BIA AND CCAA, CASES, COMMENTARY AND SUPPORTING MATERIALS

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**Lyndon Maither** *An Act reproduction with embedded principle cases with supporting material.*

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### TAX IS NOT A FOUR-LETTER WORD

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### A DIFFERENT TAKE ON TAXES IN CANADA

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**Wilfrid Laurier Univ. Press** *Taxes connect us to one another, to the common good, and to the future. This is a book about taxes: who pays what and who gets what. More than that, it's about the role of government, about citizenship and our collective well-being, about the Canada we want. The contributors, leading Canadian practitioners and scholars, explore how taxes have become a political "no-go zone" and how changes in taxation are changing Canada. They challenge the view that any tax is a bad tax and provide broad directions for fairer and smarter approaches. This is a book that will be of interest to anyone concerned with public policy and public affairs, economics, and political science and to anyone interested in challenging the conventional wisdom that lower taxes and smaller government are the cures to what ails us.*

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### ONTARIO RETAIL SALES TAX WITH COMMENTARY

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**CCH Canadian Limited**

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### CANADA'S BEST FEATURES

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### CRITICAL ESSAYS ON 15 CANADIAN FILMS

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**BRILL** *Long recognized for outstanding National Film Board documentaries and innovative animated movies, Canada has recently emerged from the considerable shadow of the Hollywood elephant with a series of feature films that have captured the attention of audiences around the world. This is the first anthology to focus on Canada's feature films - those acknowledged as its very best. With essays by senior academics and leading scholars from across the country as well as some fresh new voices, Canada's Best Features offers penetrating analyses of fifteen award-winning films. Internationally acclaimed directors David Cronenberg, Atom Egoyan, Denys Arcand, and Claude Jutra are represented here. Noteworthy films include Mon oncle Antoine, often cited as Canada's number one film of all time, such Cannes Festival favourites as Le déclin de l'empire américain and Exotica, and cult films Careful by Guy Maddin and Masala by Srinivas Krishna. The essays offer the latest word on these films and filmmakers, done from a variety of perspectives. Some of the films have never been examined in-depth before. Complete filmographies and bibliographies accompany each essay. A contextualizing introduction by Professor Gene Walz provides the necessary overview. An annotated bibliography of books on the Canadian film industry completes this impressive package.*

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### CANADIAN BANKER

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### A HISTORY OF MIGRATION FROM GERMANY TO CANADA, 1850-1939

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**UBC Press** *Jonathan Wagner considers why Germans left their home country, why they chose to settle in Canada, who assisted their passage, and how they crossed the ocean to their new home, as well as how the Canadian government perceived and solicited them as immigrants. He examines the German context as closely as developments in Canada, offering a new, more complete approach to German-Canadian immigration.*

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### DO THINK TANKS MATTER?

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### ASSESSING THE IMPACT OF PUBLIC POLICY INSTITUTES

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**McGill-Queen's Press - MQUP** *It is often assumed that think tanks carry enormous weight with lawmakers. In Do Think Tanks Matter? Donald Abelson argues that the basic question of how think tanks have evolved and under what conditions they can and do have an effect is consistently ignored. Think tank directors often credit their institutes with influencing major policy debates and government legislation and many journalists and scholars believe the explosion of think tanks in the latter part of the twentieth century indicates their growing importance in the policy-making process. Abelson goes beyond assumptions, identifying the influence and relevance of public policy institutes in today's political arena in the United States, where they've become an integral feature of the political landscape, and in Canada, where, despite recent growth in numbers, they enjoy less prominence than their US counterparts. By focusing on the policy cycle, issue articulation, policy formation, and implementation, Abelson argues that individual think tanks have sometimes played an important role in shaping the political dialogue and the policy preferences and choices of decision-makers but often in different ways and at different stages of the policy cycle. This revised and updated edition of the book includes up-to-date data (2000-08) on the growing visibility and policy relevance of think tanks in Canada and the United States.*

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### GLOBALIZATION AND ITS TAX DISCONTENTS

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### TAX POLICY AND INTERNATIONAL INVESTMENTS : ESSAYS IN HONOUR OF ALEX EASSON

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**University of Toronto Press** *"This book draws from essays given at a symposium held in honour of Professor [Alex] Easson at Queen's Law on 29 February 2008."--Preface.*

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### RESOURCES IN EDUCATION

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### ORGANIZING THE TRANSNATIONAL

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## LABOUR, POLITICS, AND SOCIAL CHANGE

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**UBC Press** *Growing recognition of transnational practices and identities is changing the way scholars and activists ask questions about migration. Organizing the Transnational articulates a multi-level cultural politics of transnationalism to frame contemporary analyses of immigration and diasporas. With chapters by academics and activists working from diverse perspectives, the volume moves beyond the conventional focus on states and migrants to consider a wide array of institutions, actors, and forms of mobilization that shape transnational engagements and communities. Its unique approach will inform the work of researchers, practitioners, and activists interested in the dynamics of transnational social spaces.*

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## TAXING MULTINATIONALS

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### TRANSFER PRICING AND CORPORATE INCOME TAXATION IN NORTH AMERICA

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**University of Toronto Press** *Eden examines how transfer pricing has been handled in different disciplines, including international business, economics, accounting, law and public policy.*

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## GIVE AND TAKE

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### THE CITIZEN-TAXPAYER AND THE RISE OF CANADIAN DEMOCRACY

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**UBC Press** *A book about tax history that's a real page-turner? Give and Take is full of surprises. A Canadian millionaire who embraced the new federal income tax in 1917. A socialist hero who deplored the burden of big government. Most surprising, twentieth-century taxes have made us richer, in political engagement and more. Taxes make the power of the state obvious, and Canadians often resisted that power. But this is not simply a tale of tax rebels. Tillotson argues that Canadians also made real contributions to democracy when they taxed wisely and paid willingly.*

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## PAIN, PRIDE, AND POLITICS

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### SOCIAL MOVEMENT ACTIVISM AND THE SRI LANKAN TAMIL DIASPORA IN CANADA

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**University of Georgia Press** *Pain, Pride, and Politics is an examination of diasporic politics based on a case study of Sri Lankan Tamils in Canada, with particular focus on activism between December 2008 and May 2009. Amarnath Amarasingam analyzes the reactions of diasporic Tamils in Canada at a time when the separatist Tamil movement was being crushed by the Sri Lankan armed forces and revises currently accepted analytical frameworks relating to diasporic communities. This book adds to our understanding of a particular diasporic group, while contributing to the theoretical literature in the area. Throughout, Amarasingam argues that transnational diasporic mobilization is at times determined and driven as much by internal organizational and communal developments as by events in their countries of origin, a phenomenon that has received relatively little attention in the scholarly literature. His work provides an in-depth examination of the ways in which a separatist sociopolitical movement beginning in Sri Lanka is carried forward, altered, and adapted by the diaspora and the struggles that are involved in this process.*

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## CLEARLY CANADIAN

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### IMPROVING EQUITY AND ACCOUNTABILITY WITH AN OVERARCHING EQUALIZATION PROGRAM

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*This commentary is the third in a series examining federal- provincial transfers in anticipation of the legislative review of the federal equalization program in 1999. The focus is on the program implications of the principle of fiscal equality: that, apart from equalization, federal programs should treat similarly situated individuals equally, regardless of place of residence. The commentary first lays out a rationale for inter-governmental transfers and reviews current programs. This is followed by a critique of the current structure of Canada's redistribution programs as politically unstable. The next section presents two proposals for moving the system of transfers in the direction of fiscal equality. The fourth section discusses transition issues involved in implementing changes recommended in the previous section. The commentary then evaluates overarching equalization in terms of temporal predictability, transparency, and accountability, and discusses its potential for reducing the confiscatory nature of the current program.*

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## JUDICIAL INTERPRETATION OF TAX TREATIES

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### THE USE OF THE OECD COMMENTARY

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**Edward Elgar Publishing** *Judicial Interpretation of Tax Treaties is a detailed analytical guide to the interpretation of tax treaties at the national level. The book focuses on how domestic courts interpret and apply the OECD Commentary to OECD Model Tax Convention on Income and on Capital. Adopting a global perspective, the book gives a systematic presentation of the main interpretive proposals put forward by the OECD Commentary, and analyses selected cases decided in domestic tax systems in order to assess whether and how such solutions are adopted through national judicial process, and indeed which of these are of most practical value. The book operates on two levels: firstly it sets out a clear and comprehensive framework of tax treaty law, which will be an important tool for any tax practitioner. Secondly, the book provides crucial guidance on issues of tax treaty law as applied at domestic level, such as investment or business income, dispute resolution and administrative cooperation.*

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## CANADIAN HUMAN CAPITAL TRANSFERS

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### THE UNITED STATES AND BEYOND

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*The first section of this commentary examines the movement of professional, managerial, and skilled personnel between the United States and Canada from a balance-of-trade perspective for 1982 to 1995. The second section uses a balance of payments approach to value the private and public costs of migration, including costs incurred by society (education-related costs), income foregone by individuals while in school, and school-related costs incurred by individuals. A cost estimate for Canada's brain drain to the US is presented. The final section discusses some of the economic motivations for Canadians moving to the US, with particular attention to the subsidy that movers receive in the form of subsidized education. Appendices include age/earnings profiles for professionals and managers, tables showing the value of human capital outflows to the US by occupation, and a table showing earnings of Canadian- and foreign-born workers, by age, gender, and occupation.*

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## CUMULATIVE IMPACT OF TAXES AND VARIOUS FEES LEVIED ON THE MARITIME INDUSTRY

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### HEARING BEFORE THE SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS OF THE COMMITTEE ON MERCHANT MARINE AND FISHERIES, HOUSE OF REPRESENTATIVES, ONE HUNDRED SECOND CONGRESS, FIRST SESSION ... MAY 23, 1991

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## OECD ECONOMIC SURVEYS: CANADA 2008

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**OECD Publishing** *OECD's periodic survey of Canada's economy. After two chapters assessing the current economic situation and policy responses to new terms of trade, ageing, and climate change, additional articles are presented on tax reform, long-term sustainability ...*

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## THE UNITED STATES-CANADA FREE TRADE AGREEMENT

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**HEARING BEFORE THE COMMITTEE ON AGRICULTURE, NUTRITION, AND FORESTRY, UNITED STATES SENATE, ONE HUNDREDTH CONGRESS, SECOND SESSION ON THE UNITED STATES- CANADA FREE-TRADE AGREEMENT AND ITS EFFECT ON THE U.S. AGRICULTURE, ELIMINATION OF TARIFFS, AND IMPROVED ACCESS TO UNITED STATES AND CANADIAN MARKETS MAY 24, 1988**

**FOOD MARKET COMMENTARY**

**COMMENTARY**

**DANCING AROUND THE ELEPHANT**

**CREATING A PROSPEROUS CANADA IN AN ERA OF AMERICAN DOMINANCE, 1957-1973**

**University of Toronto Press** *A generation of Canadian historians has viewed the mid-twentieth century as an era when Canada gave ground to the United States in most areas of foreign trade policy. In Dancing around the Elephant, Bruce Muirhead elegantly and cogently disputes this view. Drawing on extensive archival research, Muirhead notes a number of cases where Canadian policy makers actually got the better of their American counterparts, such as the Auto Pact, and examines contextual reasons for the pessimistic view of Canada's trade position and hostile scepticism of American dominance: the rise of Canadian nationalism, the growth of anti-Americanism (based largely on the American role in Vietnam), and the election of Pierre Elliot Trudeau as prime minister in 1968. Muirhead also dispels the myth that the poor relationship between Prime Minister John Diefenbaker and President John F. Kennedy served to wreak havoc on Canadian-American relations, clearly demonstrating its lack of effect on trade patterns. While not disregarding a number of trade failures - particularly with the United Kingdom and Europe - Dancing around the Elephant refutes the position of those who question Canada's economic independence in the mid-century and will prove tremendously controversial with economic historians and those who study Canadian nationalism.*

**TIES THAT BLIND IN CANADIAN/AMERICAN RELATIONS**

**POLITICS OF NEWS DISCOURSE**

**Routledge** *First Published in 1990. Routledge is an imprint of Taylor & Francis, an informa company.*

**AMERICA THE FAIR**

**USING BRAIN SCIENCE TO CREATE A MORE JUST NATION**

**Cornell University Press** *What makes a person liberal or conservative? Why does the Democratic Party scare off so many possible supporters? When does our "injustice trigger" get pulled, and how can fairness overcome our human need to look for a zero-sum outcome to our political battles? Tapping into a pop culture zeitgeist linking Bugs Bunny, Taylor Swift, and John Belushi; through popular science and the human brain; to our political predilections, arguments, and distrusts, Daniel Meegan suggests that fairness and equality are key elements missing in today's society. Having crossed the border to take up residency in Canada, Meegan, an American citizen, has seen first-hand how people enjoy as rights what Americans view as privileges. Fascinated with this tension, he suggests that American liberals are just missing the point. If progressives want to win the vote, they need to change strategy completely and champion government benefits for everyone, not just those of lower income. If everyone has access to inexpensive quality health care, open and extensive parental leave, and free postsecondary education, then everyone will be happier and society will be fair. The Left will also overcome an argument of the Right that successfully, though incongruously, appeals to the middle- and upper-middle classes: that policies that help the economically disadvantaged are inherently bad for others. Making society fair and equal, Meegan argues, would strengthen the moral and political position of the Democratic Party and place it in a position to revive American civic life. Fairness, he writes, should be selfishly enjoyed by everyone.*

**FEARFUL SYMMETRY - THE FALL AND RISE OF CANADA'S FOUNDING VALUES**

**eBookIt.com** *In the 1960s, Canada began a seismic shift away from the core policies and values upon which the country had been built. A nation of "makers" transformed itself into a nation of "takers." Crowley argues that the time has come for the pendulum to swing back - back to a time when Canadians were less willing to rely on the state for support; when people went where the work was rather than waiting for the work to come to them. Thought-provoking, meticulously detailed and ultimately polarizing, Fearful Symmetry is required reading for anyone who is interested in where this country began, where it's been, and where it's going.*

**THE CHANGING RULES OF THE MONEY GAME**

**PROCEEDINGS OF A ROUNDTABLE ON CANADA'S FINANCIAL INDUSTRY AFTER THE BANK MERGER PROPOSALS**

**CONVENTIONS AND PROTOCOLS ON AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME AND CAPITAL; TREATY DOC. 103-29, SWEDEN; TREATY DOC. 103-30, UKRAINE; TREATY DOC. 103-31, MEXICO; TREATY DOC. 103-32, FRANCE; TREATY DOC. 103-33, KAZAKHSTAN; TREATY DOC. 103-34, PORTUGAL; TREATY DOC. 104-4, CANADA**

**HEARING BEFORE THE COMMITTEE ON FOREIGN RELATIONS, UNITED STATES SENATE, ONE HUNDRED FOURTH CONGRESS, FIRST SESSION, JUNE 13, 1995**

**HOUSE OF COMMONS DEBATES, OFFICIAL REPORT**

**"TAXES COVERED"**

**A STUDY OF ARTICLE 2 OF THE OECD MODEL TAX CONVENTIONS**

**IBFD** *The substantive scope of a tax treaty determines the extent of protection it can provide against international double taxation. Countries worldwide have adopted the text of Art. 2 ("Taxes covered") of the OECD Model Tax Conventions in their bilateral tax treaties. However, the structure and wording of Art. 2, which have remained virtually unchanged since the beginnings of tax treaty law in the 1920s, create interpretive issues and uncertainties in practical treaty application. This book not only provides an analysis of recent case law and academic literature, but also sheds light on the background to the standard formulations so widely used in the provision on the substantive scope of today's tax treaties. The source documents used have rarely found their way into publications before: historical OEEC and OECD Reports and Minutes, originally largely classified as "restricted" and thus inaccessible to the public for decades, provide an insight into the drafting process of Art. 2 and the discussions of Delegates from various nations on practical implications for treaty application. The book aims to contribute to the understanding of the "taxes covered" and to guide subsequent research and heighten awareness of problems in the interpretation and application of the provision on substantive scope in tax treaties.*

**HOUSE OF COMMONS DEBATES**

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## NAVIGATING A CHANGING WORLD

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### CANADA'S INTERNATIONAL POLICIES IN AN AGE OF UNCERTAINTIES

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**University of Toronto Press** *This volume addresses the governance and evolution of Canada's international policies, and the challenges facing Canada's international policy relations on multiple fronts.*

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### CHILLING OUT

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### THE MAI IS ON ICE BUT GLOBAL INVESTMENT REMAINS HOT

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*Begins with a discussion of why foreign investment needs rules and a review of current foreign investment rules, bilateral investment treaties, and multilateral and regional investment rules. This is followed by an evaluation of the draft version of the Multilateral Agreement on Investment (MAI), its features and problems with its incompleteness and the extent of its provisions. The implications of the MAI for Canadian sovereignty are then discussed. Concludes with proposals for an improved international agreement on investment.*

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### INFORMATION INDUSTRY DIRECTORY

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*Comprehensive directory of databases as well as services "involved in the production and distribution of information in electronic form." There is a detailed subject index and function/service classification as well as name, keyword, and geographical location indexes.*

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### BIRTH OF A NEW CURRENCY

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### THE POLICY OUTLOOK AFTER MONETARY UNION IN EUROPE

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*The introduction of a single European currency, the euro, will have major consequences for the international monetary system and hence for the economic environment in which Canada must function. This commentary explores some of the issues involved. It discusses the economics and politics of the euro, the features of the Maastricht Treaty and criteria for European Monetary Union membership, constraints on fiscal policy after monetary union, the need for fiscal controls, the independence of the central bank under the Treaty, political considerations and the exchange rate, the labour market and macroeconomic policy, post-monetary-union problems, fiscal expansion, post-union scenarios where the euro ranges from weak to strong, and international monetary arrangements. Finally, the implications of European monetary union for Canada are discussed.*

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### FUTURE INCOME PROSPECTS FOR CANADA'S SENIOR CITIZENS

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### IRPP

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### GOOD TAXES

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### THE CASE FOR TAXING FOREIGN CURRENCY EXCHANGE AND OTHER FINANCIAL TRANSACTIONS

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**Dundurn** *In Good Taxes, Alex Michalos puts forth an argument in favour of a financial transactions tax.*

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### TAX TREATIES

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**HEARING BEFORE THE COMMITTEE ON FOREIGN RELATIONS, UNITED STATES SENATE, NINETY-SEVENTH CONGRESS, FIRST SESSION, ON VARIOUS TAX TREATIES, (EX. T, 96-2), (EX. M, 96-2), (EX. C, 94-2), (EX. U 96-2), (EX. H, 95-2), (EX. O, 96-2), (EX. Z, 96-2), (97-1), (EX. E, 96-2), (97-10), (EX. Y, 96-2), (EX. C, 95-1), SEPTEMBER 24, 1981**

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### CANADIAN TAX JOURNAL

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### REVIEW OF THE TECHNOLOGY ASSESSMENT ACT

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### HEARINGS BEFORE THE SUBCOMMITTEE ON SCIENCE, RESEARCH, AND TECHNOLOGY OF THE COMMITTEE ON SCIENCE AND TECHNOLOGY, U.S. HOUSE OF REPRESENTATIVES, NINETY-FIFTH CONGRESS, FIRST AND SECOND SESSIONS

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### TERRORISM: COMMENTARY ON SECURITY DOCUMENTS VOLUME 107

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### U.N. RESPONSE TO AL-QAEDA

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**Oxford University Press** *In Volume 107 of Terrorism: Commentary on Security Documents, entitled "U.N. Response to Al Qaeda", new General Co-Editor Kristen Boon covers the history that started with U.N. Security Council Resolution 1267 in 1999 and that continues today. In that document, the United Nations established sanctions against any individuals or organizations financially supporting those two terrorist organizations or Osama bin Laden. With her expert commentary on all documents flowing from that resolution, Boon traces the unfolding fate of those sanctions, from the amending resolutions that expanded the sanctions' purview to the provision of a notice period for targeted parties to specific countries and regions' implementing legislation to court challenges claiming that the sanctions violate the targeted parties' human rights. No other book offers what this volume does: an expert guide to the U.N.'s first effort at sanctioning a select group of parties rather than a broad, comprehensive category of unspecified people.*

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