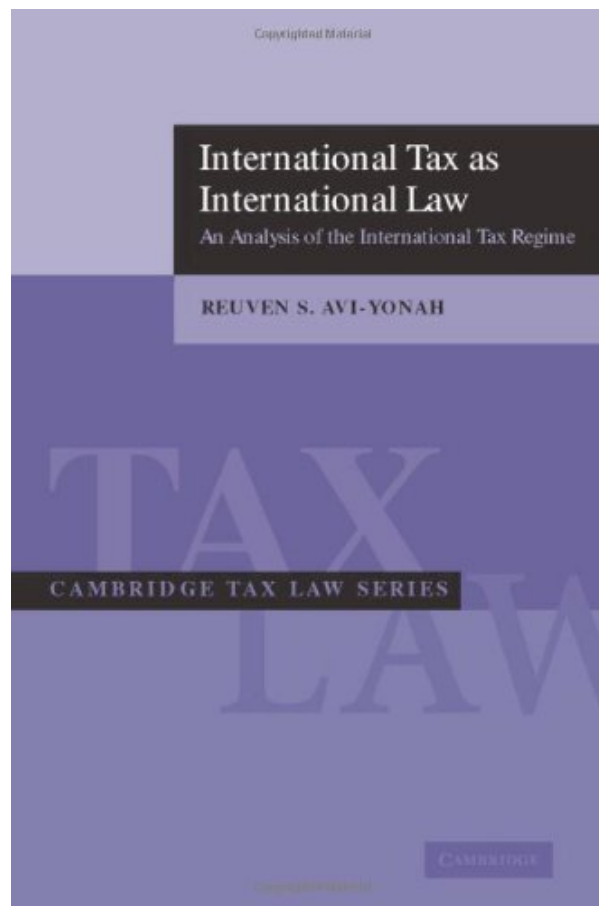


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About the Author

Reuven S. Avi-Yonah is the Irwin I. Cohn Professor of Law and Director of the International Tax LLM Program and the Michigan-Tsinghua Exchange Program at the University of Michigan Law School. Dr Avi-Yonah graduated from the Hebrew University in 1983, received his Ph.D. in history from Harvard University in 1986, and received a JD from Harvard Law School in 1989. He practiced tax law in Boston and New York until 1993. He became an Assistant Professor of Law at Harvard Law School in 1994 and moved to the University of Michigan in 2000. He has published numerous articles on domestic and international tax issues and is the author of six other tax books. He has served as consultant to the U.S. treasury and the OECD on tax competition issues and has been a member of the executive committee of the New York State Bar Association Tax Section and of the Advisory Board of Tax Management, Inc. He is currently a member of the Steering Group of the OECD International Network for Tax Research and Chair of the ABA Tax Section VAT Committee.

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This book examines the coherent international tax regime that is embodied in both the tax treaty network and in domestic laws, and the way it forms a significant part of international law, both treaty based and customary. The practical implication is that countries are not free to adopt any international tax rules they please, but rather operate in the context of the regime, which changes in the same ways international law changes over time. Thus, unilateral action is possible, but is also restricted, and countries are generally reluctant to take unilateral actions that violate the basic norms that underlie the regime. The book explains the structure of the international tax regime and analyzes in detail how US tax law embodies the underlying norms of the regime.

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