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From the Editors

EDITORIAL

This is the first of two "bumper" issues of the *Review*. Contributions have been invited from a range of distinguished practitioners on topics of particular significance to members of the tax profession. The contributions offer a thoughtful analysis of the issues they deal with and we hope the observations they contain will be of practical use and significance in day to day practice.

Richard Bramwell QC provides a robust challenge to the Revenue view that land situate outside the UK is subject to a charge to Schedule E. The general law of trusts in relation to offshore trusts is examined by John Mowbray QC (who considers protectors of offshore trusts) and Paul Matthews (letters of wishes). Stephen Brandon has contributed a penetrating analysis of section 739 issues still unanswered post *Willoughby*.

Corporation tax is also represented. Robert Venables QC, the Consulting Editor examines the new residence rules for companies while Julian Ghosh, one of the Managing Editors, provides a critique of the thin capitalisation provisions. So far as the latter is concerned, we are delighted that the Inland Revenue have requested an advance copy — we shall (if permitted) report any developments.

The Editors welcome contributions. The Editors particularly welcome debate on points raised in articles appearing in the *Review* (or indeed other Reviews and Journals). All articles (whether long or short), ideas for articles, and other correspondence on editorial matters should be addressed to: Julian Ghosh Esq, Managing Editor, Offshore Tax Planning Review, 24 Old Buildings, Lincoln's Inn, London WC2A 3UJ.

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Robert Venables QC

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