
Contents of Volume 5, Issue 2

CONTENTS

	Page No
From the Editors	v
Transfer of Assets Abroad: Mr Brackett's Problem Case Robert Venables QC	65
Sovereign Immunity and Repayment of Withholding Tax Robert Venables QC	73
Interests in Offshore Funds Held by Non-United Kingdom Resident Trustees: Finance Act 1995 Changes Robert Venables QC	85
UK Taxation of Non-Residents: The New Substantive Rules Robert Venables QC	91
UK Taxation of Non-Residents: Liability of UK Representatives Robert Venables QC	109
Appendices to Articles on UK Taxation of Non-Residents	
Appendix A Inland Revenue Budget Press Statement of 29th November 1994 Investment Managers	135
Appendix B Inland Revenue Budget Press Statement of 29th November 1994 Self-Assessment	139
Appendix C Statement of Practice SP 15/91 of 29th November 1991	143
Appendix D RI 29 (November 1992) <i>Investment Managers Acting as Agents for Non-Residents</i>	149

From the Editors

EDITORIAL

This is an unusual issue of the *Review*, containing, as it does, five articles by a single author, namely the Consulting Editor. Certain myths surrounding the decision in *IRC v Brackets* are exploded and the nature of sovereign immunity is explored, while the new offshore funds legislation is subjected to scrutiny. The two final contributions examine the Finance Act 1995 changes in the substantive rules governing the taxation of non-UK residents and the issues concerning the taxation of UK representatives of foreign principals. We are pleased to be able to present an analysis of these important questions by an author particularly associated with offshore tax planning.

The next issue of the *Review* will continue the topical theme, with contributions on the new thin capitalisation rules, further analysis of the *Willoughby* decision and a review of the rules governing land held outside the UK.

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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