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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 Brackett* 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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