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detailed research on the un model convention s unique features the un model convention has a significant influence on international tax treaty practice and is especially used by emerging and developing countries as a starting point for treaty negotiations driven by the aim to achieve consistency in the international tax treaty practice the structure and content is to a large extent similar in the un model and the oecd model however whereas the oecd has historically focused its efforts on issues mainly relevant for developed countries the un tax committee has continuously attempted to specifically take into account tax treaty policies for developing countries when drafting and amending the un model convention compared to the oecd model convention the un model convention aims at giving more weight to the source principle popular examples are the pe definition in the un model which provides for a lower threshold than article 5 of the oecd model or article 12a on fees for technical services which has been introduced with the latest amendment of the un model convention 2017 and allows for a withholding tax to be levied on payments to non residents when the payer of the fee is a resident of that contracting state irrespective of where the services are provided interestingly in the discussions of the tax challenges arising from the digitalization of the economy the oecd and the g20 are also exploring options to allocate more taxing rights to the jurisdiction of the customer and or user i e the market jurisdictions as this has traditionally been the focus of the un model convention its unique features and developing countries practices could be taken into account when exploring new nexus rules that are not constrained by the physical presence requirement this book contains the master's theses of the full time II m program 2018 2019 for which special features of the un model convention has been chosen as the general topic with this book the authors and editors do not aim at discussing each article of the un model convention but rather focus on the unique features of the un model convention which are explored in detail this is supplemented with an evaluation of the function and relevance of the un tax committee in the international tax policy discussion and with an analysis of the influences of the oecd s beps project on the un model he oecd s beps project on the un model

get the most out of samsung s galaxy s5 smartphone right from the start with clear instructions from technology expert preston gralla this missing manual gives you a guided tour of samsung s new flagship phone including great new features such as the fingerprint scanner heart rate sensor and download booster you II get expert tips and tricks for playing music calling and texting shooting photos and videos and even getting some work done the important stuff you need to know get connected browse the manage email and

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in 1877 the members of the united states senate postponed all business for the day so that they might attend a horse race the iconic polarizing post civil war event at the center of this story the nation still recovering from the depredations of the civil war and the reconstruction that followed recognized it as a north vs south encounter pitting new york s powerful thoroughbred tom ochiltree and new jersey s parole owned by the ostentatious northern tycoons pierre and george lorrilard against the already legendary kentucky crack ten broeck owned by the teetotaling plain living frank harper and ridden by black jockey and former slave william walker representing a former slave state and its southern values the race and the colorful cast of characters involved reflected the still seething america during one of the nation s most difficult and divisive periods shrager presents a fascinating and heart pounding piece of history exposing the racial and economic tensions following the civil war that culminated in one final race to the end

this book is intended for anyone who wants to prepare for the information security foundation based on iso iec 27001 exam of exin all information security concepts in this revised edition are based on the iso iec 27001 2013 and iso iec 27002 2022 standards a realistic case study running throughout the book usefully demonstrates how theory translates into an operating environment in all these cases knowledge about information security is important and this book therefore provides insight and background information about the measures that an organization could take to protect information appropriately sometimes security measures are enforced by laws and regulations this practical and easy to read book clearly explains the approaches or policy for information security management that most organizations can consider and implement it covers the quality requirements an organization may have for information the risks associated with these quality requirements the countermeasures that are necessary to mitigate these risks how to ensure business continuity in the event of a disaster when and whether to report incidents outside the organization

funciones dinÁmicas sugerencias de búsqueda y rescate los consejos de seguridad alertan

al personal de sar sobre los riesgos esperados y los potenciales imprevistos los recursos listados proporcionan sugerencias para profundizar en el estudio de los temas de cada capítulo las fotografías e ilustraciones a todo color apoyan y ayudan a aclarar el textoontenido integralfuncontenido integral lineamientos para asegurar que el personal de búsqueda y rescate sar esté preparado física y mentalmente para la búsqueda y rescate consideraciones legales y éticas importantes para la búsqueda y rescate una extensa variedad de equipo de sar ropa y tecnología y cuando debe usarse cada uno métodos de supervivencia e improvisación en diversos ambientes métodos de seguimiento y herramientas de navegaciónfundamentos de búsqueda y rescate funsar segunda edición constituye un recurso integral para el personal nuevo y experimentado de búsqueda y rescate sar por sus siglas en inglés proporcionando una visión general de los aspectos y procedimientos de búsqueda y rescate funsar enseña las técnicas esenciales empleadas de manera satisfactoria por casi todo el personal de búsqueda y rescate funsar ofrece un enfoque profundo y práctico para la búsqueda y rescate y es recomendado para todos los respondientes de emergencia la segunda edición ha sido actualizada en su totalidad para satisfacer las necesidades actuales del personal de búsqueda y rescate destacando el equipo y la tecnología más recientes y enfocándose en las técnicas de búsqueda y rescate probadas y eficaces cubre todas las áreas de búsqueda y rescate desde elegir la mejor ropa y calzado considerando el medio ambiente hasta empacar ligero e improvisar el seguimiento y la localización de sujetos ideal para profesionales remunerados y para voluntarios este recurso esencial combina las características dinámicas con el contenido más reciente y completo

across the globe migration has been met with intensifying modes of criminalization and securitization and claims for political asylum are increasingly met with suspicion asylum seekers have become the focus of global debates surrounding humanitarian obligations on the one hand and concerns surrounding national security and border control on the other in technologies of suspicion and the ethics of obligation in political asylum contributors provide fine tuned analyses of political asylum systems and the adjudication of asylum claims across a range of sociocultural and geopolitical contexts the contributors to this timely volume drawing on a variety of theoretical perspectives offer critical insights into the processes by which tensions between humanitarianism and security are negotiated at the local level often with negative consequences for asylum seekers by investigating how a politics of suspicion within asylum systems is enacted in everyday practices and interactions the authors illustrate how asylum seekers are often produced as suspicious subjects by the very systems to which they appeal for protection contributors illi benjamin carol bohmer nadia el shaarawi bridget m haas john beard haviland marco jacquemet benjamin n lawrance rachel lewis sara mckinnon amy shuman charles watters

this book explores the language used in legal arguments it moves beyond traditional argumentation studies using corpus linguistics and computational tools combined with a deep understanding of the institutional environment in which legal argumentation takes place the studies presented in this volume unveil judges argumentative discourse and legal interpretation strategies providing a toolkit for scholars and practitioners alike

a comprehensive study offering the first comparative account of the increasing dependence on expertise in the asylum and refugee status determination process

the goal of this practice guideline is to improve the quality of care and treatment outcomes for patients with schizophrenia the guideline aims to help clinicians optimize care for their patients by providing evidence based statements that are intended to enhance knowledge and increase the appropriate use of evidence based pharmacological and nonpharmacological treatments for schizophrenia in addition it includes statements related to assessment and treatment planning which are an integral part of patient centered care

you don't need a technical background to build powerful databases with filemaker pro 13 this crystal clear guide covers all new filemaker pro 13 features such as its improved layout tools and enhanced mobile support whether you re running a business printing a catalog or planning a wedding you II learn how to customize your database to run on a pc mac browser or ios device the important stuff you need to know get started tour filemaker pro s features and create your first database in minutes access data anywhere use filemaker go on your ipad or iphone or share data on the dive into relational data solve problems quickly by connecting and combining data tables create professional documents publish reports invoices catalogs and other documents with ease harness processing power use calculations and scripts to crunch numbers search text and automate tasks add visual power and clarity create colorful charts to illustrate and summarize your data share your database on a secure server add the high level features of filemaker pro advanced and filemaker pro server

recent trends in cold formed steel construction discusses advancements in an area that has become an important construction material for buildings the book addresses cutting edge new technologies and design methods using cold formed steel as a main structural material and provides technical guidance on how to design and build sustainable and energy efficient cold formed steel buildings part one of the book introduces the codes specifications and design methods for cold formed steel structures while part two provides computational analysis of cold formed steel structures part three examines the

structural performance of cold formed steel buildings and reviews the thermal performance acoustic performance fire protection floor vibrations and blast resistance of these buildings with a final section reviewing innovation and sustainability in cold formed steel construction addresses building sciences issues and provides performance solutions for cold formed buildings provides guidance for using the next generation design method computational tools and technologies edited by an experienced researcher and educator with significant knowledge on new developments in cold formed steel construction

photoshop elements 13 looks sharper performs better and has more sophisticated photo editing and slideshow features than previous versions but knowing which tools to use when can be confusing the new edition of this bestselling book removes the guesswork with candid jargon free advice and step by step guidance you II get the most out of elements for everything from sharing and touching up photos to fun print and online projects the important stuff you need to know get to work right away import organize edit crop and color correct your photos with ease retouch any image repair and restore old and damaged photos and patch undesirable areas with content aware fill add pizzazz dress up your photos with dozens of filters layer styles and special effects create the perfect picture seamlessly insert people and objects from other photos using photomerge compose share your photos use new methods to quickly create and email stunning slideshows to friends use your words make greeting cards calendars and flyers by adding text to images unleash your creativity design photo books scrapbooks collages and other projects

this book deals with the interplay between identities codes stereotypes and politics governing the various constructions and deconstructions of gender in several western and non western societies germany italy serbia romania cameroon indonesia vietnam and others readers are invited to discover the realm of gender studies and to reflect upon the transformative potentialities of globalisation and interculturality

the successful design and construction of iconic new buildings relies on a range of advanced technologies in particular on advanced modelling techniques in response to the increasingly complex buildings demanded by clients and architects structural engineers have developed a range of sophisticated modelling software to carry out the necessary structural analysis and design work advanced modelling techniques in structural design introduces numerical analysis methods to both students and design practitioners it illustrates the modelling techniques used to solve structural design problems covering most of the issues that an engineer might face including lateral stability design of tall buildings earthquake progressive collapse fire blast and vibration analysis non linear

geometric analysis and buckling analysis resolution of these design problems are demonstrated using a range of prestigious projects around the world including the buji khalifa willis towers taipei 101 the gherkin millennium bridge millau viaduct and the forth bridge illustrating the practical steps required to begin a modelling exercise and showing how to select appropriate software tools to address specific design problems

in this issue of veterinary clinics small animal practice guest editors drs maxey I wellman and m judith radin bring their considerable expertise to the topic of clinical pathology evaluation of clinical laboratory data is used daily in the diagnosis and monitoring of veterinary patients and the field is rapidly expanding as new tests and technologies become available this issue provides valuable up to date information on current important topics in clinical pathology that are of interest to clinicians veterinary students and residents contains 16 practice oriented topics including digital cytology tick borne diseases toxicology case studies laboratory diagnosis of endocrine diseases blood transfusions and more provides in depth clinical reviews on clinical pathology offering actionable insights for clinical practice presents the latest information on this timely focused topic under the leadership of experienced editors in the field authors synthesize and distill the latest research and practice guidelines to create clinically significant topic based reviews

the best selling clinical psychology science practice and diversity presents an inclusive and culturally competent view of the vast world of clinical psychology through lively examples robust scholarship and a highly readable narrative award winning author andrew m pomerantz explores the key topics of clinical assessment psychotherapy and ethical and professional issues while also incorporating discussions of current controversies and specialized topics the fifth edition includes a new career focused feature original videos addressing ethical issues and updates reflecting the latest research findings in the field instructors clinical psychology is accompanied by free sage edge online resources including in my practice whiteboard videos these original videos breathe life into concepts via stories drawn from the author s own experience as a practicing clinician

new space technologies earth observation and satellite navigation in particular have proven to be invaluable drivers of sustainable development thus contributing to the protection of several human rights the good at the same time however new space technologies raise concerns for the right to privacy the bad and face a number of challenges posed by hostile cyber operations the ugly dr arianna vettorel analyzes the relevant international european and domestic legal frameworks and highlights the need for several innovative approaches and reforms in a transnational and bottom up

perspective in order to maximize the good and minimize the bad and the ugly of new space technologies

new learning objectives and pre test questions at the start of every chapter focus students attention on the knowledge and critical thinking expectations for each chapter new full color images have replaced many of the black and white images to give students a more vivid picture of clinical situations and procedures new updated information incorporates new research and visuals to ensure students are equipped with the latest best practices

adhd and asperger syndrome in smart kids and adults offers detailed examples of individuals who have above average cognitive intelligence but struggle with executive function impairments of adhd and significant social emotional impairments of asperger syndrome the book centers around twelve case studies of bright children teens and adults treated for both adhd and asperger syndrome each chapter describes diverse examples of their strengths and their difficulties and explains how these individuals can be helped with appropriate treatment to overcome their adhd impairments and to improve their ability to understand and interact more effectively with others case examples are followed by updated science based descriptions of these disorders providing science based information about adhd and asperger syndrome in clearly understandable accessible language this text is ideal for clinicians educators social workers medical and mental health service providers and parents of those struggling with such impairments it also advocates for restoring the diagnosis of asperger syndrome to diagnostic manuals of the american psychiatric association and world health organization

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